



2013 CITY OF FORT WORTH ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

FINAL REPORT

MARCH 14, 2014

**2013 CITY OF FORT WORTH
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

**FINAL REPORT
MARCH 14, 2014**

**PREPARED FOR
THE HOUSING AND ECONOMIC DEVELOPMENT DEPARTMENT
CITY OF FORT WORTH, TEXAS**

Prepared by:
Western Economic Services, LLC
212 SE 18th Avenue
Portland, OR 97214
Phone: (503) 239-9091
Toll Free: (866) 937-9437
Fax: (503) 239-0236
Website: <http://www.westernes.com>



If you feel you have experienced discrimination in the housing industry, please contact:

Fort Worth Human Relations Commission

818 Missouri Avenue

Fort Worth, Texas 76104

(817) 392-7525

(817) 392-7529 (Fax)

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
SECTION I. INTRODUCTION	11
SECTION II. SOCIO-ECONOMIC CONTEXT	19
A. Demographics	19
B. Economics	32
C. Housing	41
SECTION III. FAIR HOUSING LAW, STUDY, AND CASE REVIEW	57
A. Fair Housing Laws	57
B. Fair Housing Studies	58
C. Fair Housing Cases	63
SECTION IV. REVIEW OF THE EXISTING FAIR HOUSING STRUCTURE	67
A. Fair Housing Agencies	67
B. Complaint Process Review	71
SECTION V. FAIR HOUSING IN THE PRIVATE SECTOR	75
A. Lending Analysis	75
B. Fair Housing Complaints	98
C. Fair Housing Survey – Private Sector Results	103
SECTION VI. FAIR HOUSING IN THE PUBLIC SECTOR	109
A. Public Policies and Services	109
B. Fair Housing Survey – Public Sector Results	111
C. Community Development Council Hearing Minutes	116
SECTION VII. PUBLIC INVOLVEMENT	117
A. Fair Housing Survey	117
B. Fair Housing Forums	121
SECTION VIII. SUMMARY OF FINDINGS	123
SECTION IX. IMPEDIMENTS AND SUGGESTED ACTIONS	129
A. Impediments to Fair Housing Choice And Suggested Actions	129
SECTION X. GLOSSARY	133
SECTION XI. APPENDICES	137
A. Additional HUD Complaint Data	137
B. Comments from the 2013 Fair Housing Survey	139
C. Additional HMDA Data	161
D. CRA Data for the City of Fort Worth	167
E. Focus Group Minutes	171

EXECUTIVE SUMMARY

AI PURPOSE AND PROCESS

As a requirement of receiving funds under the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME), Housing Opportunities for Persons with Aids (HOPWA) and the Emergency Solutions Grant (ESG), entitlement jurisdictions must submit certification of affirmatively furthering fair housing to the U.S. Department of Housing and Urban Development (HUD). This certification has three elements:

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

In the *Fair Housing Planning Guide*, page 2-8, HUD provides a definition of impediments to fair housing choice as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.¹

The list of protected classes included in the above definition is drawn from the federal Fair Housing Act, which was first enacted in 1968. However, state and local governments may enact fair housing laws that extend protection to other groups, and the AI is expected to address housing choice for these additional protected classes as well.

The AI process affirmatively furthers fair housing involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, and housing transactions, particularly for persons who are protected under fair housing law.

The development of an AI also includes public input and review via direct contact with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified impediments.

METHODOLOGY

As part of the consolidated planning process, and as a requirement for receiving HUD formula grant funding, the City of Fort Worth is undertaking this AI to evaluate impediments to fair housing choice within the City.

In Fort Worth, fair housing law is covered by the federal Fair Housing Act—which includes protections based on race, color, religion, national origin, sex, disability, and familial status—and the Fort Worth Code of Ordinances—which extends additional protections based on

¹ U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide*. Vol. 1, p. 2-8. http://www.hud.gov/offices/cpd/about/conplan/fairhousingexs/Module5_TopSevenAFFH.pdf

sexual orientation, transgender, gender identity, and gender expression. Fair housing choice in Fort Worth was evaluated in relation to this list of protected classes. It is worth noting that the State of Texas also guarantees fair housing choice in Title 15 of the State Property Code; however, the list of protected classes in the property code extends only to those groups covered by federal law.

The purpose of this report is to determine current impediments to fair housing choice at work in Fort Worth and to suggest actions that the city can consider in order to overcome the identified impediments. Thus, this report represents only the first step in the three-part certification process presented on the previous page.

This AI was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources used in analyzing fair housing choice in the City of Fort Worth included:

- Socio-economic and housing data from the U.S. Census Bureau,
- Employment data from the U.S. Bureau of Labor Statistics,
- Economic data from the U.S. Bureau of Economic Analysis,
- Investment data from the Community Reinvestment Act,
- Home loan application data from the Home Mortgage Disclosure Act, and
- Housing complaint data from HUD and the Fort Worth Human Relations Commission.

Qualitative research included evaluation of relevant existing fair housing research and fair housing law cases from the City of Fort Worth. Additionally, this research included the evaluation of information gathered from several public input opportunities conducted in relation to this AI. This included a 2013 Fair Housing Survey of 504 stakeholders throughout the City to investigate fair housing issues in the private and public sectors. Also included were two forums held in Fort Worth to allow public input and reaction to preliminary findings of the AI.

Ultimately, a list of potential impediments was drawn from these sources and further evaluated based on HUD's definition of impediments to fair housing choice, as presented on the previous page. Potential impediments to fair housing choice present within the City were identified, along with actions to consider in order to overcome or reduce the possible impediments.

OVERVIEW OF FINDINGS

This AI reviews both the public and private sector contexts for housing markets in Fort Worth, in order to determine the effects these forces have on housing choice. As part of that review, analysis of demographic, economic, and housing data provide background context for the environments in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected classes; economic and employment data show additional factors in influencing housing choice; and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of the City's residents.

This contextual review of the factors that influence housing choice is essential to a holistic analysis that covers the variety of challenges that Fort Worth residents may face while exercising a housing choice. Once this contextual background analysis has been performed,

detailed review of fair housing laws, cases, studies, complaints, and public involvement data can be better supported by the background information. The structure provided by local, state, and federal fair housing laws shapes the complaint and advocacy processes available in the City, as do the services provided by local, state, and federal agencies. Private sector factors in the homeownership and rental markets, such as home mortgage lending practices, have substantive influence on fair housing choice. While the Housing and Economic Development Department may not have the influence or resources to fully address such issues, the analysis provided in this AI assists with the recognition and consideration of potential private sector barriers. In the public sector, policies and codes of local governments and a limited location of affordable rental units can significantly affect the housing available in the area, as well as neighborhood and community development trends.

Complaint data and AI public involvement feedback further help define problems and possible impediments to housing choice for persons of protected classes, and reinforce suspected findings from the contextual and supporting data. Combined, these diverse sets of data provide a robust analysis identifying impediments to fair housing choice for Fort Worth residents.

Alone, findings from any one of the following sources do not undeniably indicate the existence of an impediment to fair housing choice. However, when combined with results of other AI research, prospective impediments can be found, and in some cases, additional results directly indicate the cause of an impediment to fair housing choice.

Socio-Economic Context

Analysis of demographic, economic, and housing data provided background context for the environments in which housing choices are made. Demographic data indicated the sizes of populations and protected classes; economic and employment data showed economic factors; and counts of housing by type, tenure, quality, and cost indicated the ability of the housing stock to meet the needs of the City's residents.

According to the Census Bureau, between 2000 and 2010, the population of Fort Worth grew from 534,694 to 741,206 persons, or by 38.6 percent. Data for population by age showed that the persons between the age of 20 and 34 represented a smaller share of the City's population at the end of the decade than they had at the beginning, along with the population over the age of 65. Age groups with the largest populations comprised persons aged 5 to 19 and 35 to 54.

Census Bureau data showed that the racial and ethnic composition of the City also changed after 2000. While the populations of all racial and ethnic groups increased during this time, they did so at different rates. The rate of growth in the White and Asian populations was greater than the rate of growth in the population overall, meaning that these groups represented a greater share of the overall population in 2010 than in 2000. Growth in the population of residents who identified as "Black" or "Other" was slower than overall population growth; consequently, these groups represented a smaller share of the total population in 2010 than in 2000. In terms of ethnicity, the Hispanic population grew by 58.4 percent, compared to a 30.2 percent growth in the non-Hispanic population, contributing to a marked growth in the representation of Hispanic residents in Fort Worth.

The recent economic recession did not impact employment in Fort Worth to the extent seen elsewhere in the country; however, it did leave its mark on real per capita income and real wages per job. While the rate of unemployment increased after 2008, this was a result of growth in the labor force outpacing growth in employment rather than a reduction in the number of employed, and the unemployment rate for Fort Worth was lower than the national figures during the recession. However, as noted, real wages per job and real per capita income both fell dramatically in 2009.

The number of housing units in the City increased by 37.9 percent between 2000 and 2010, and the share of total housing stock represented by single-family units increased after 2000. Of potential concern is the rapid growth in the number of vacant units that are not on the market—the “other vacant” units. These units were particularly concentrated in the Como, the southeast, and south of Fort Worth (as well as in one large northern census tract), making blight a concern in those areas. Overcrowding and severe overcrowding were less prevalent in the five years leading up to 2011 than they had been in 2000, in spite of the marked shift toward larger households over the decade. Incomplete bathroom facilities were also less of a problem late in the decade, though the share of households with incomplete kitchen facilities increased slightly after 2000.

Fort Worth residents were, on average, more cost-burdened in 2000 than they had been at the beginning of the decade. The proportion of cost-burdened and severely cost-burdened households increased by nearly 9 percent over the decade, while housing costs increased over the same period.

Review of Fair Housing Laws, Studies, and Cases

A review of laws, studies, cases, and related materials relevant to fair housing in Fort Worth demonstrated the complexity of the fair housing landscape. The fair housing laws in the State of Texas were designed to mirror the federal Fair Housing Act, and extend protections to only those groups that are mentioned in the federal law. However, in some cases, fair housing jurisprudence in Texas has revealed state law to be more limited in its application than the federal FHA as it has been interpreted. For example, though the FHA has been consistently interpreted to prohibit not only intentional discrimination based on race but also policies that produce disparate impacts, even if those policies are race-neutral, Texas’ Supreme Court recently found, in *Ojo v. Farmers Group, Inc.*, that insurance companies in Texas are exempt from this stricter standard under the McCarran-Ferguson Act. Review of fair housing cases in Fort Worth revealed both issues of unlawful discrimination in Texas and the complexity of the legal landscape around such issues.

Fair Housing Structure

A review of the fair housing profile in Fort Worth profiled several organizations that provide fair housing services to city residents, including outreach and education, complaint intake, and testing and enforcement activities for both providers and consumers of housing. These organizations include HUD, the Fort Worth Human Relations Commission, and the North Texas Fair Housing Center.

Fair Housing in the Private Sector

Evaluation of the private housing sector included review of home mortgage loan application information, as well as mortgage lending practices, fair housing complaint data, and results from the private sector section of the 2013 Fair Housing Survey.

Home Mortgage Disclosure Act (HMDA) data were used to analyze differences in home mortgage application denial rates in Fort Worth by race, ethnicity, sex, income, and Census tract. Evaluation of home purchase loan applications from 2004 through 2011 showed that American Indian, black, and Hispanic applicants experienced higher rates of loan denials than white or Asian applicants, even after correcting for income in most cases. Black borrowers were also issued loans with high annual percentage rates (HALs) at over double the rate at which they were issued to white borrowers, while the rate of HALs to Hispanic borrowers was over ten percentage points higher than for white borrowers. With high proportions of low-quality, high-annual percentage rate loans being issued to these particular groups, the burden of foreclosure may fall more heavily upon them.

Analysis of data from the Community Reinvestment Act (CRA), which is intended to encourage investment in low- and moderate-income areas, showed that business loans did not tend to be directed toward the areas with lower incomes in Fort Worth as frequently as they were toward higher income areas. CRA loans were notably absent from many areas in the southeast.

Fair housing complaint data was requested from HUD and the Human Relations Commission (HRC). HUD data showed that 1,853 fair housing-related complaints were filed in the City from 2004 through October 2013. The protected classes most impacted by discrimination, based on these data, were disability, race, and national origin. The most common complaint issues related to:

- Discriminatory terms, conditions, privileges, or services and facilities;
- Discriminatory terms, conditions, or privileges relating to rental; and
- Failure to make reasonable accommodation.

Findings based on complaint data from HRC largely reinforced these findings.

Results from the private sector portion of the 2013 Fair Housing Survey suggested the presence of discrimination based on race and ethnicity in the rental industry, while discrimination based on sex and family status was perceived to occur in the real estate, mortgage, and home lending industries. Discrimination based on income was widely cited, but source of income is not protected by fair housing law in Fort Worth.

Fair Housing in the Public Sector

The status of affirmatively furthering fair housing within Fort Worth's public sector was evaluated through review of the placement of several types of assisted housing in the City, the relationship between the location of public transit and assisted housing, and the results of the public sector section of the 2013 Fair Housing Survey.

Evaluation of the distribution of housing vouchers and HUD-assisted rental properties in the City demonstrated that these public-assisted units tended to be concentrated in areas in the south and southeast. Many of the voucher- and HUD-assisted developments were served by public transit, but there were some areas with high concentrations of housing vouchers that were not served by city bus routes, notably in southern and peripheral census tracts.

Results from the public sector section of the 2013 Fair Housing Survey reflect several concerns: Inadequate code enforcement, particularly as relates to overcrowding, was perceived to disproportionately impact low-income and minority areas. Restrictive zoning policies and decisions were also seen as potential barriers to fair housing choice, particularly when they are perceived to be motivated by neighborhood opposition to fair and affordable housing. Among survey respondents, discrimination in the public sector was seen to be most strongly connected to race.

The results of this Analysis of Impediments were presented to the Community Development Council (CDC) on December 11, 2013. The commentary session following this presentation clarified several points of the analysis and focused on the role of the CDC in addressing public sector impediments.

Public Involvement

Public involvement opportunities were an integral part of the development of this AI. Activities included the 2013 Fair Housing Survey to evaluate current fair housing efforts, three focus groups of housing industry stakeholders, and the two public forums wherein citizens were offered the chance to comment on initial findings of the AI and offer feedback on prospective impediments.

Results of the 2013 Fair Housing Survey showed that the majority of respondents felt that fair housing laws are useful, though many respondents were not familiar with fair housing law. A few respondents showed familiarity with the classes of persons protected by fair housing law in the City, though there was a common misperception that age is a protected class in Fort Worth. Many respondents were not aware of appropriate venues to which to refer a victim of housing discrimination. Many respondents noted the need for increased fair housing education and outreach activities, and some felt there was a need for increased fair housing testing activities. A majority of respondents felt that fair housing laws are not adequately enforced in Fort Worth.

The focus groups were held in August, with additional public presentations occurring in September before the Human Relations Commission and the City Council in January of 2014. These opportunities allowed citizens, agencies, and the Community development council, to voice concerns about barriers to fair housing choice. Comments received at these forums focused on the need for better education to homebuyers, home sellers, housing market professionals, and renters, as well as the need for improvements to public transportation in the city.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

PRIVATE SECTOR IMPEDIMENTS, ACTIONS, AND MEASURABLE OBJECTIVES

Impediment 1: Discriminatory terms, conditions, privileges, or services and facilities in the rental markets. The existence of this impediment was suggested in the HUD housing complaint data, respondents' answers to the 2013 Fair Housing Survey, and comments received at the focus groups and Fair Housing Forums.

Action 1.1: Enhance testing and enforcement activities and document the outcomes of enforcement actions

Measurable Objective 1.1: Increase number of testing and enforcement activities conducted

Action 1.2: Continue to educate landlords and property management companies about fair housing law

Measurable Objective 1.2: Increase number of outreach and education activities conducted

Action 1.3: Continue to educate housing consumers in fair housing rights

Measurable Objective 1.3: Increase number of outreach and education activities conducted

Impediment 2: Discriminatory patterns in home purchase loan denials. Evidence of this impediment was seen in the HMDA data, which indicated higher denial rates among racial and ethnic minorities, even when correcting for income, as well as higher denial rates for women applicants.

Action 2.1: Educate buyers through credit counseling and home purchase training

Measurable Objective 2.1: Number of outreach and education activities conducted

Impediment 3: Discriminatory patterns in predatory lending. Evidence of this impediment was seen in the HMDA data, which showed higher rates of subprime loans among black, American Indian, and Hispanic applicants. It was also indicated in respondents' answers provided in the 2013 Fair Housing Survey, who felt that racial and ethnic minorities were disproportionately offered subprime loans.

Action 3.1: Educate buyers through credit counseling and home purchase training

Measurable Objective 3.1: Increase number of outreach and education activities conducted

Impediment 4: Failure to make reasonable accommodation or modification. The existence of this impediment was suggested in the review of complaints filed with HUD, from the responses to the 2013 Fair Housing Survey, and through the topics discussed at the Fair Housing Forums, particularly in regard to persons with disabilities. This impediment includes new construction that seems to occur that lacks proper handicapped accessibility.

Action 4.1: Enhance testing and enforcement activities and document the outcomes of enforcement actions

Measurable Objective 4.1: Increase number of testing and enforcement activities conducted

Action 4.2: Educate housing providers about requirements for reasonable accommodation or modification

Measurable Objective 4.2: Increase number of training sessions conducted

Action 4.3: Conduct audit testing on newly constructed residential units

Measurable Objective 4.3: Number of audit tests completed

Action 4.4: Consider appropriate incremental changes in building codes to allow enhanced designed features for accessibility and visitability

Measurable Objective 4.4: Number of changes made

Impediment 5: Missed Fair Housing Training Opportunities. As expressed in the 2013 Fair Housing Survey, a substantive number of persons responding to the survey had not taken advantage of fair housing training opportunities that are available to them

Action 5.1: Conduct outreach to private sector personnel on the advantages of enrolling in training opportunities that are available

Measurable Objective 5.1: The number of entities who were contacted throughout the year.

Measurable Objective 5.2: Suggest ways for both consumers and professions to better take advantage of the Human Rights Commission training opportunities.

PUBLIC SECTOR IMPEDIMENTS, ACTIONS, AND MEASURABLE OBJECTIVES

Impediment 1: Getting permission for reasonable accommodation appears to be too difficult.

As noted in the 2013 Fair Housing Survey, as well as focus groups, it appears to be problematic for the disabled to get permission to reconfigure their dwellings to accommodate their disability.

Action 1.1: Select sample of past ten variance applicants and interview them

Measurable Objective 1.1: Number of applicants interviewed.

Measurable Objective 1.2: Number of hours spent looking for barriers in any applicable variance or permitting process

Action 1.2: Conduct a review to determine precisely where the barriers are located and then take efforts to overcome these barriers

Measurable Objective 1.2: Number of hours spent looking for barriers in the variance process

Action 1.3: Discuss with planning department the findings of the variance barriers and move to change the process

Measurable Objective 1.3: Number of meeting conducted with planning to change any applicable variance or permitting process

Impediment 2: Overconcentration of vouchers, assisted housing, and lower-income housing in selected areas of the City. Geographic maps prepared that show the geographic dispersion of such housing is concentrated in selected areas of the City.

Action 2.1: Add additional criteria to assisted housing location and other investment decisions

Measurable Objective 2.1: Determine the additional criteria, such as concentration of poverty or concentration of racial or ethnic minority, and incorporate this in the decision process by December 31, 2014.

Measurable Objective 2.2: Evaluate the implications of redevelopment and other investments in areas with high rates of poverty and/or higher concentrations of racial and ethnic minorities

Action 2.2: Create certification classes for a small set of voucher holders so that they may qualify for enhanced value vouchers, a voucher that pays slightly higher than other vouchers

Measurable Objective 2.2: Facilitate education of prospective landlords about the qualities of certified holders of Housing Choice Voucher tenants

Action 2.3: Increase voucher use in moderate income neighborhoods

Measurable Objective 2.3: Facilitate education of prospective landlords about the qualities of Housing Choice Voucher.

Action 2.4: Request Council to convene a discussion regarding the lack of substantive connections between low income areas, employment areas, and public transit.

Measurable Objective 2.4: Preparation of request, and if granted, the discussion materials to be presented to the Council.

Impediment 3: The transit system is not well designed for those residing in lower income areas to gain good access to areas with better opportunities. Geographic maps prepared that show that the transit system is not as well designed as it could be to gain access to areas with higher employment opportunities.

Action 3.1: Contact the transit agency and request enhanced service to these lower income areas

Measurable Objective 3.1: The number of times that the transit agency was contacted and the type of response gained.

Impediment 4: Lack of sufficient understanding of fair housing and affirmatively furthering fair housing. This particular impediment addresses different fair housing considerations, the lack of sufficient understanding, but also neighborhood resistance to the development of assisted housing

Action 4.1: Conduct outreach and education to the public for several perspective related to fair housing.

Measurable Objective 4.1: The number of outreach and education actions taken in regard to the value of having housing available to all income groups in Fort Worth, thereby encouraging neighborhoods to be more willing to accept assisted housing facilities.

Measurable Objective 4.2: Participate in sponsorship or co-sponsorship of public meetings during April of 2014, Fair Housing Month.

Measurable Objective 4.3: Request on a periodic basis fair housing complaint data from the North Texas Fair Housing Council and publish this information to teach others of the Fair Housing Council as well as fair housing activities in the City

Impediment 5: Lack of protections for source of income and age. Input received from the 2013 Fair Housing Survey, as well as during the Fair Housing Forums indicated this condition. The City's HEDD should defer the following to the HRC:

Action 5.1: Discussion of additional protections pertaining to source-of-income and age in City law

Measurable Objective 5.1: The number of contacts made with the HRC about these matters

Action 5.2: Refer to the HRC the fair housing concerns of the public testimony received regarding the lack of homeless shelter space for persons with sexual identity considerations

Measurable Objective 5.2: The number of contacts made with the HRC about these matters

SECTION I. INTRODUCTION

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

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal access to housing.

WHY ASSESS FAIR HOUSING?

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e) (5) of the federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG),² and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle.

As a part of the consolidated planning process, states and entitlement communities that receive such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. This certification has three parts:

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

In the *Fair Housing Planning Guide*, page 2-8, HUD notes that impediments to fair housing choice are:

² The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

- “Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.”³

State and local governments may enact fair housing laws that extend protection to other groups as well. For example, while the Texas Fair Housing Act guarantees protected class status to only those groups enumerated in the Federal Fair Housing Act⁴, the City of Fort Worth extends protections based on sexual orientation, transgender, gender identity, and gender expression⁵. A comparison of protections by federal and state law is presented below in Table I.1.

Table I.1			
Comparison of Fair Housing Laws			
State of Texas and City of Fort Worth			
Protected Group	Federal Fair Housing Act	Texas Fair Housing Act	City of Fort Worth
Race	X	X	X
Sex	X	X	X
Religion	X	X	X
Familial Status	X	X	X
Disability (including HIV/AIDS)	X	X	X
National Origin	X	X	X
Color	X	X	X
Sexual Orientation			X
Transgender			X
Gender Identity			X
Gender Expression			X

PURPOSE OF THIS RESEARCH

HUD interprets the broad objectives of affirmatively furthering fair housing to include:

- “Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all persons, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.”⁶

The objective of the 2013 AI process was to research, analyze, and identify prospective impediments to fair housing choice throughout the City. The goal of the completed AI is to suggest actions that the sponsoring agency can consider when working toward eliminating, or mitigating the effects of, identified impediments.

³ *Fair Housing Planning Guide*.

⁴ 15 Tex. Prop. Code §301.021, §301.025 <http://www.statutes.legis.state.tx.us/Docs/PR/htm/PR.301.htm>

⁵ Fort Worth Code of Ordinances, Ch. 17, Art. III, §17-86

[www.amlegal.com/nxt/gateway.dll/Texas/fortworth_tx/cityoffortworthtexascodeofordinances?f=templates\\$fn=default.htm\\$3.0\\$vid=aml egal:fortworth_tx](http://www.amlegal.com/nxt/gateway.dll/Texas/fortworth_tx/cityoffortworthtexascodeofordinances?f=templates$fn=default.htm$3.0$vid=aml egal:fortworth_tx)

⁶ *Fair Housing Planning Guide*, p.1-3.

LEAD AGENCY

The Fort Worth Housing and Economic Development Department was the lead agency for the preparation of the 2013 Analysis of Impediments to Fair Housing Choice. Western Economic Services, LLC, a Portland, Oregon-based consulting firm specializing in analysis and research in support of housing and community development planning, prepared this AI and incorporated comments from the citizens, City agency representatives, and stakeholders.

Commitment to Fair Housing

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the City certifies that it will *affirmatively further fair housing* (AFFH). This statement means that the City has conducted an AI, will take appropriate actions to overcome the effects of any impediments identified through that analysis, and will maintain records that reflect the analysis and actions taken in this regard.

GEOGRAPHIC SCOPE OF THE ANALYSIS

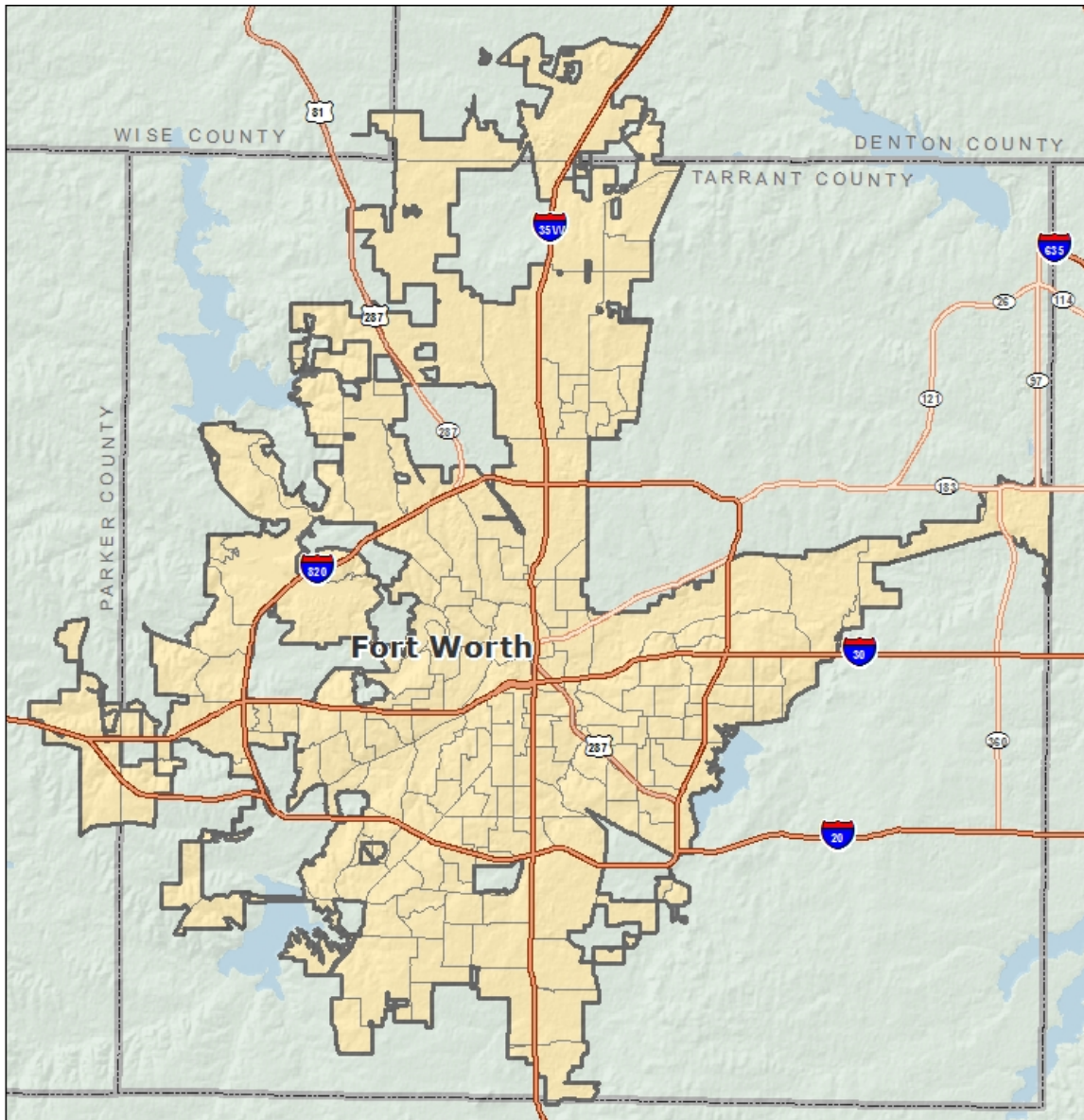
This AI addresses the status of fair housing within the City of Fort Worth. Map I.1 presented on the following page shows the incorporated area of Fort Worth, along with census tracts within the City, major transportation routes, and surrounding county boundaries. As shown in this map, the size of Census tracts varied across the City; Census tract boundaries, which are updated with each decennial census, are drawn based on population size, and ideally represent approximately the same population for each. As such, data for densely populated tracts, such as those within some of the entitlement cities, are more geographically specific than data for communities in less-populated tracts.

RESEARCH METHODOLOGY

The AI process involves a thorough examination of a variety of sources related to housing, particularly for persons who are protected under fair housing laws. AI sources include Census data, employment and income information, home mortgage application data, business lending data, fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain. Relevant information was collected and evaluated via four general approaches:





1. *Primary Research*, or the collection and analysis of raw data that did not previously exist;
2. *Secondary Research*, or the review of existing data and studies;
3. *Quantitative Analysis*, or the evaluation of objective, measurable, and numerical data; and
4. *Qualitative Analysis*, or the evaluation and assessment of subjective data such as individuals' beliefs, feelings, attitudes, opinions, and experiences.

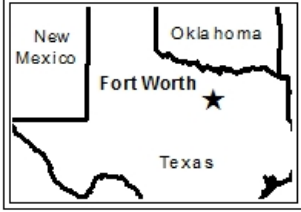
Map I.1
Fort Worth Study Area
 City of Fort Worth
 2010 Census Bureau Data




LEGEND

City of Fort Worth, Texas

 County Boundaries	 Census Tracts
 City Boundaries	 Major Roads



0 3 Miles 

Data Source: 2010 Tiger

Some baseline secondary and quantitative data were drawn from the Census Bureau, including 2000 and 2010 Census counts, as well as American Community Survey data averages from 2007 through 2011. Data from these sources included population, personal income, poverty, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Labor Statistics, the Bureau of Economic Analysis, and a variety of other sources. The following narrative offers a brief description of other key data sources employed for the 2013 AI for the City of Fort Worth.

Home Mortgage Disclosure Act Data

To examine possible fair housing issues in the home mortgage market, Home Mortgage Disclosure Act (HMDA) data were analyzed. The HMDA was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity, and sex of mortgage applicants, along with loan application amounts, household income, the Census tract in which the home is located, and information concerning prospective lender actions related to the loan application. For this analysis, HMDA data from 2004 through 2011 were analyzed, with the measurement of denial rates by Census tract and by race and ethnicity of applicants the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter higher denial rates and receive loans with unusually high interest rates.

Fair Housing Complaint Data

Housing complaint data were used to analyze discrimination in the renting and selling of housing. HUD provided fair housing complaint data for the City from January 2004 through October 2013. This information included the basis, or protected class pursuant to the complaint; the issue, or prospective discriminatory action, pursuant to the grievance; and the closure status of the alleged fair housing infraction, which relates to the result of the investigation. The review of 1,853 fair housing complaints from within the City allowed for inspection of the tone, the relative degree and frequency of certain types of unfair housing practices, and the degree to which complaints were found to be with cause. The Fort Worth Human Relations Commission also provided information for 989 complaints. Analysis of complaint data focused on determining which protected classes may have been disproportionately impacted by housing discrimination based on the number of complaints, while acknowledging that many individuals may be reluctant to step forward with a fair housing complaint for fear of retaliation or other repercussions.

Fair Housing Survey

One of the methods HUD recommends for gathering public input about perceived impediments to fair housing choice is to conduct a survey. As such, the City elected to utilize a survey instrument as a means to encourage public input in the AI process. This step was a cost-effective and efficient method to utilize research resources.

The survey targeted individuals involved in the housing arena, although anyone was allowed to complete the survey. The prospective contact list was assembled by the City, with the goal of targeting experts in at least the following areas:

- Residential and commercial building codes and regulations;
- Residential health and safety codes and regulations (structural, water, and sewer);
- Local land use planning;
- Banking industry;
- Real estate industry;
- Renter rights and obligations, including civil rights;
- Fair housing, disability, social service, and other advocacy organizations; and
- Neighborhood associations.

The survey notification was made through a mass email distribution, in which the survey link was provided and directed respondents to the online survey. Invitations to participate in the survey were also distributed to all community centers. The email message also urged respondents to forward the survey announcement to other individuals and agencies involved in housing. Furthermore, the announcement and survey link were posted on the jurisdiction's website, and printed copies were made available during public meetings. The Fort Worth 2013 Fair Housing Survey received 504 responses; and, while the survey was also available in Spanish, no responses were received to the Spanish version.

The survey was designed to address a wide variety of issues related to fair housing and affirmatively furthering fair housing. If limited input on a particular topic was received, it was assumed that the entirety of stakeholders did not view the issue as one of high pervasiveness or impact. This does not mean that the issue was nonexistent in the City, but rather that there was not a large perception of its prevalence, as gauged by survey participants.

The following narrative summarizes key survey themes and data that were addressed in the survey instrument.

Federal, State, and Local Fair Housing Laws

The first section of the survey asked respondents to address a number of questions related to fair housing laws, including assessment of their familiarity with and understanding of these laws, knowledge of classes of persons protected by these laws, the process for filing fair housing complaints, and an inquiry into whether or not fair housing laws should be changed.

Fair Housing Activities

The second section of the survey evaluated stakeholders' awareness of and participation in fair housing activities in the City, including outreach activities such as trainings and seminars, as well as monitoring and enforcement activities such as fair housing testing exercises.

Barriers to Fair Housing Choice in the Private Sector

This section addressed fair housing in the private housing sector of Fort Worth and offered a series of two-part questions. The first part asked respondents to indicate awareness of questionable practices or barriers to fair housing choice in a variety of private sector industries, and the second part requested a narrative description of these questionable practices or concerns if an affirmative response was received. The specific areas of the private sector that respondents were asked to examine included the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industries,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

The use of open-ended questions allowed respondents to address any number of concerns such as redlining, neighborhood issues, lease provisions, steering, substandard rental housing, occupancy rules, and other fair housing issues in the private housing sector of the City.

Fair Housing in the Public Sector

In a manner similar to the previous section, respondents were asked to offer insight into their awareness of questionable practices or barriers to fair housing in the public sector. A list of areas within the public sector was provided, and respondents were asked first to specify their awareness of fair housing issues within each area. If they were aware of any fair housing issues, they were asked to further describe these issues in a narrative fashion. Respondents were asked to identify fair housing issues within the following public sector areas related to housing:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies, and
- Any other public administrative actions or regulations.

The questions in this section were used to identify fair housing issues in the City regarding zoning, building codes, accessibility compliance, subdivision regulations, displacement issues, development practices, residency requirements, property tax policies, land use policies, and NIMBYism.⁷

Additional Questions

Finally, respondents were asked about their awareness of any local fair housing plans or specific geographic areas of the City with fair housing problems. Respondents were also asked to leave additional comments.

⁷ "Not In My Backyard" mentality.

Research Conclusions

The final list of impediments to fair housing choice for the City of Fort Worth was culled from all quantitative, qualitative, and public input sources, and was based on HUD's definition of an impediment to fair housing choice as any action, omission, or decision that affects housing choice because of protected class status. The determination of qualification as an impediment was derived from the frequency and severity of occurrences drawn from quantitative and qualitative data evaluation and findings.

PUBLIC INVOLVEMENT

The City of Fort Worth managed the public input process associated with this AI. The key actions that were used to notify the public of the AI process included email announcements, public postings, newspaper advertisements and notices, phone calls, website postings and social media, and other communication activities directed to citizens and stakeholders in the fair housing arena.

The City held three focus groups with selected experts in three general areas: the rental markets, the homeowner markets, and the development process. These focus groups were early in the data collection process, occurring on August 27 and 28, 2013.

As part of the process of involving the public in the development of the AI, the City conducted two fair housing forums, on September 24, before the Human Relations Commission and another on September 25 before the Community Development Council. The forums were designed to offer the public the opportunity to supply commentary on the status of fair housing in the City as well as provide feedback on the early findings of the AI. Another public input opportunity was realized after release of the Final Report, which occurred before the Community Development Council on December 11, 2013. This included a public review period throughout the remainder of December and early January 2014, with a Final Presentation before the City Council on January 7, 2014. A more detailed discussion of these sessions is presented in **Section VII**.

This AI is available online at <http://www.fortworthtexas.gov/hed/housing>

SECTION II. SOCIO-ECONOMIC CONTEXT

This section presents demographic, economic, and housing information collected from the Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics, and other sources. Data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section helps illustrate the underlying conditions that shape housing market behavior and housing choice in Fort Worth by presenting the demographic, economic, and housing stock context.

To supplement 2000 and 2010 Census data, information for this analysis was also gathered from the Census Bureau’s American Community Survey (ACS). The ACS data cover similar topics to the decennial counts but include data not appearing in the 2010 Census, such as household income and poverty. The key difference of these datasets is that ACS data represent a five-year average of annual data estimates as opposed to a point-in-time 100 percent count; the ACS data reported herein span the years from 2007 through 2011. The ACS figures are not directly comparable to decennial Census counts because they do not account for certain population groups such as the homeless. However, percentage distributions from the ACS data can be compared to distributions from the 2000 and 2010 Censuses.

A. DEMOGRAPHICS

As part of the essential review of the background context of the City of Fort Worth markets in which housing choices are made, detailed population and demographic data describe the City’s residents. These data summarize not only the protected class populations, but characteristics of the total population for the entire City and the outcome of housing location choices. These data help to address whether over-concentrations of racial and ethnic minorities exist, and if so, which areas of the City are most affected. Extreme concentrations of protected class populations do not necessarily imply impediments to fair housing choice, but may represent the results of impediments identified in other data.

POPULATION DYNAMICS

Table II.1, at right, presents population estimates in Fort Worth, as drawn from the 2000 and 2010 Censuses and intercensal estimates for 2001 through 2009, 2011, and 2012. In total, population in the City increased from 534,694 persons in 2000 to 777,992 in 2012, or by 45.5 percent. This compares to an estimated statewide population increase of 24.4 percent from 2000 to 2012.

Year	Population	% Yearly Change
2000	534,694	.
2001	566,402	5.93%
2002	585,542	3.38%
2003	602,759	2.94%
2004	619,117	2.71%
2005	637,139	2.91%
2006	662,346	3.96%
2007	685,762	3.54%
2008	706,526	3.03%
2009	727,257	2.93%
2010	741,206	1.92%
2011	761,664	2.76%
2012	777,992	2.14%
Change 00-12	243,298	45.5%

POPULATION BY AGE

Data on population by age in 2000 and 2010 in the City of Fort Worth, presented below in Table II.2, showed that the largest population groups in both Census counts represented persons aged 5 to 19 and 35 to 54. The share of the total population represented by persons aged 35 to 54 was 27.1 in both Censuses, the share of persons aged less than 5 years, 5 to 19 years, and 55 to 64 years grew modestly over the decade. The largest population increase in absolute terms occurred in the cohort of persons aged 35 to 54 years, which grew by 55,960 people, though the largest percentage change was in the cohort of persons aged 55 to 64. The pace of growth among persons aged 20 to 24, 25 to 34, and over 65 years lagged behind growth in all other age groups, resulting in lower shares of the total population represented by these age cohorts in 2010, as compared to 2000. Nevertheless, the population of all age cohorts increased over the decade, and overall the population increased by 206,512, or 38.6 percent.

Table II.2
Population by Age

City of Fort Worth
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	45,452	8.5%	66,819	9.0%	47.0%
5 to 19	122,340	22.9%	171,893	23.2%	40.5%
20 to 24	43,562	8.1%	54,371	7.3%	24.8%
25 to 34	91,042	17.0%	121,379	16.4%	33.3%
35 to 54	145,163	27.1%	201,123	27.1%	38.5%
55 to 64	35,673	6.7%	65,060	8.8%	82.4%
65 or Older	51,462	9.6%	60,561	8.2%	17.7%
Total	534,694	100.0%	741,206	100.0%	38.6%

More information regarding the elderly population was also collected from the 2000 and 2010 Census counts. As shown below in Table II.3, in both 2000 and 2010, the largest age cohorts among the elderly population represented persons in the age ranges of 70 to 74 and 75 to 79. However, the share of the total elderly population represented by each of these groups decreased as the cohort of persons aged 75 to 79 fell slightly and the cohort of persons aged 70 to 74 grew at a relatively slow pace (5.5 percent). The age groups that showed the largest increases over the decade were those at the younger end of the spectrum, or the populations aged 65 to 66 and 67 to 69.

Table II.3
Elderly Population by Age

City of Fort Worth
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	5,588	10.9%	8,686	14.3%	55.4%
67 to 69	8,143	15.8%	10,886	18.0%	33.7%
70 to 74	12,883	25.0%	13,594	22.4%	5.5%
75 to 79	11,041	21.5%	10,964	18.1%	-.7%
80 to 84	7,455	14.5%	8,402	13.9%	12.7%
85 or Older	6,352	12.3%	8,029	13.3%	26.4%
Total	51,462	100.0%	60,561	100.0%	17.7%

POPULATION BY RACE AND ETHNICITY

Table II.4 details changes in the population by race and ethnicity. The white population represented the largest racial group in Fort Worth in both the 2000 and 2010 Censuses; it also experienced the largest numerical increase during this time, growing by 133,726 persons. The next largest increases, in absolute terms, occurred in groups of those who identified as Black, Asian, and “Other”, all of which grew by more than 10,000 persons. The large absolute growth in the Asian population also represented a relatively large percentage change in the size of this population over the decade; however, the large percentage change in the population of Native Hawaiian/Pacific Islanders during this time actually represented very modest growth in absolute terms. In terms of ethnicity, defined separately from race, the Hispanic population increased by 58.4 percent between 2000 and 2010, outstripping the pace of growth among Non-Hispanic residents and increasing the share of the total population represented by Hispanic residents in 2010.

Table II.4
Population by Race and Ethnicity

City of Fort Worth
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	319,159	59.7%	452,885	61.1%	41.9%
Black	108,310	20.3%	140,133	18.9%	29.4%
American Indian	3,144	.6%	4,762	.6%	51.5%
Asian	14,105	2.6%	27,615	3.7%	95.8%
Native Hawaiian/ Pacific Islander	341	.1%	746	.1%	118.8%
Other	75,100	14.0%	92,098	12.4%	22.6%
Two or More Races	14,535	2.7%	22,967	3.1%	58.0%
Total	534,694	100.0%	741,206	100.0%	38.6%
Non-Hispanic	375,326.00	70.2%	488,738.00	65.9%	30.2%
Hispanic	159,368	29.8%	252,468	34.1%	58.4%

The geographic distribution of racial and ethnic minorities can vary significantly throughout a community. The U.S. Department of Housing and Urban Development (HUD) has determined that an area demonstrates a disproportionate share of a population when the percentage of that population is 10 percentage points or more above the study area average. For example, the Hispanic population of Fort Worth represented 34.1 percent of the total population in 2010. Therefore, any area in the City that showed a Hispanic population in excess of 44.1 percent held a disproportionate share of that population.

This analysis of racial and ethnic distribution was conducted by calculating race or ethnicity as the percentage of total population and then plotting the data on a geographic map of Census tracts in Fort Worth. While disproportionate and high shares of minority racial or ethnic populations may cause some concern, they do not on their own imply impediments to fair housing choice. They may, of course, be the result of such an impediment (i.e., real estate or rental steering or land use policies that lead to segregation in some parts of the City); however these concentrations may also be due, in some cases, to natural factors that do not implicate housing discrimination, such as employment or cultural factors.

For the purposes of this AI, maps were produced for several racial and ethnic groups based on both 2000 and 2010 Census data in order to examine how the concentrations of these

populations changed over time. These maps are discussed below and presented on the following pages.

Map II.1, on the following page, shows that in 2000, the black population in Fort Worth was concentrated in a few census tracts in the southern and southeastern portions of the city, particularly in the area bounded by I-35W to the west and I-30 to the north, an area that includes the Stop Six neighborhood. Additionally, the African-American population represented over 80 percent of the total population in the census tract that includes the area around the East Libbey Avenue neighborhood. Two census tracts near the northern intersection of I-35W and I-820 also exhibited a disproportionate share of black residents.

As shown in Map II.2, two pages from here, the black population remained concentrated in the southern portion of the City in 2010, although it had become more widely distributed within that area since 2000. Several census tracts showed a disproportionate share of black residents in 2010 where they had not in 2000, including tracts in east Fort Worth in the area between SR 183 and I-30, and several tracts west of I-35W and south of I-20. Conversely, the concentration of black residents in several areas appears to have lessened during the decade, notably in the southeastern portion of the City. The two census tracts at the northern intersection of I-35W and I-820 no longer held a disproportionate share of black residents in 2010.

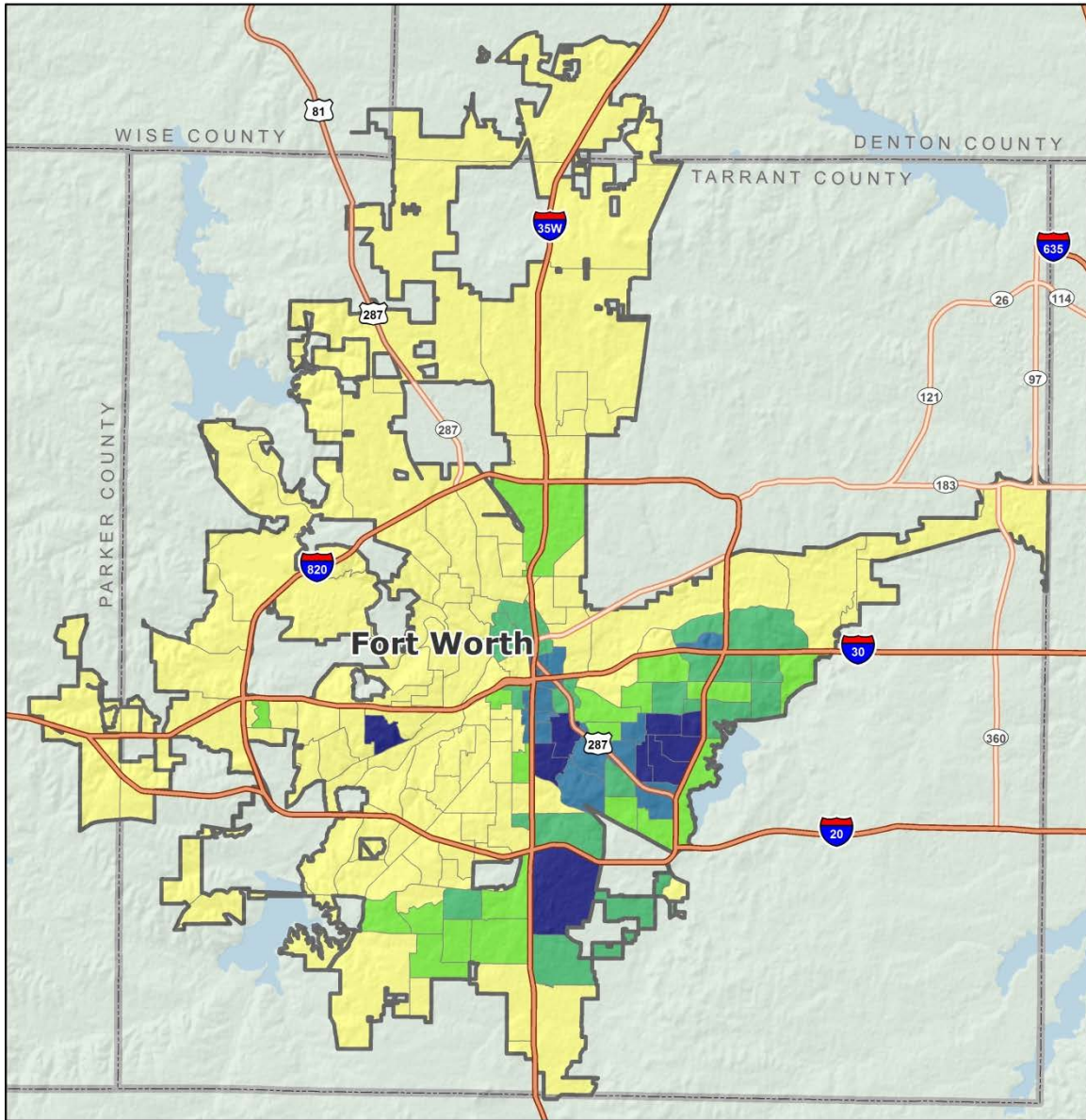
Map II.3, presents the concentration of the Asian population in Fort Worth according to the 2000 Census. During that year, Asian residents represented 2.6 percent of the total population per tract, on average. In one census tract in the northwest of Fort Worth, the Asian population represented 19.3 percent of the total population. This was the highest concentration of Asian residents during that year, although the Asian population was over-represented to a lesser degree in census tracts throughout the City.

The distribution of the Asian population in Fort Worth, as of the 2010 Census, is shown in Map II.4. The Asian population in Fort Worth increased by 1.1 percent between 2000 and 2010. The large peripheral census tract to the northwest that had shown a high concentration of Asian residents in 2000 no longer did so in 2010—in the latter year, the highest concentration of Asian residents was seen in a small census tract in the extreme east of Fort Worth, near the Interchange of County Road 180 and County Road 303.

The distribution of the Hispanic population, at the time of the 2000 Census, is presented in Map II.5. This group averaged 29.8 percent per tract, and several tracts were above the disproportionate share threshold. The highest shares were seen in the western and northwestern portions of town, and some were as high as 94 percent in some areas. All of the areas that exhibited a disproportionate share of Hispanic residents were inside the beltway.

Census Bureau data showed that the Hispanic population increased to an average of 34.1 percent of the population per tract in 2010. Map II.6 reveals that the population was largely—though no longer exclusively—concentrated in the area inside the beltway, as it had been in 2000. The number of tracts in which Hispanic residents made up a highly disproportionate share of the population increased over the decade, and the share of the population represented by Hispanic residents reached 94.4 percent in some areas.

Map II.1
Percent Black Population by Census Tract
 City of Fort Worth
 2000 Census Data



LEGEND

2000 Black Population
 2000 Average Percent Black Population in Fort Worth = 20.3%
 Disproportionate Share Threshold = 30.3%

Percent Black

0.0% - 20.3%	Lightest Yellow
20.4% - 30.3%	Light Green
30.4% - 57.4%	Medium Green
57.5% - 76.6%	Dark Green
76.7% - 95.7%	Dark Blue

Disproportionate Share Threshold (indicated by a dashed line between 30.3% and 30.4%)

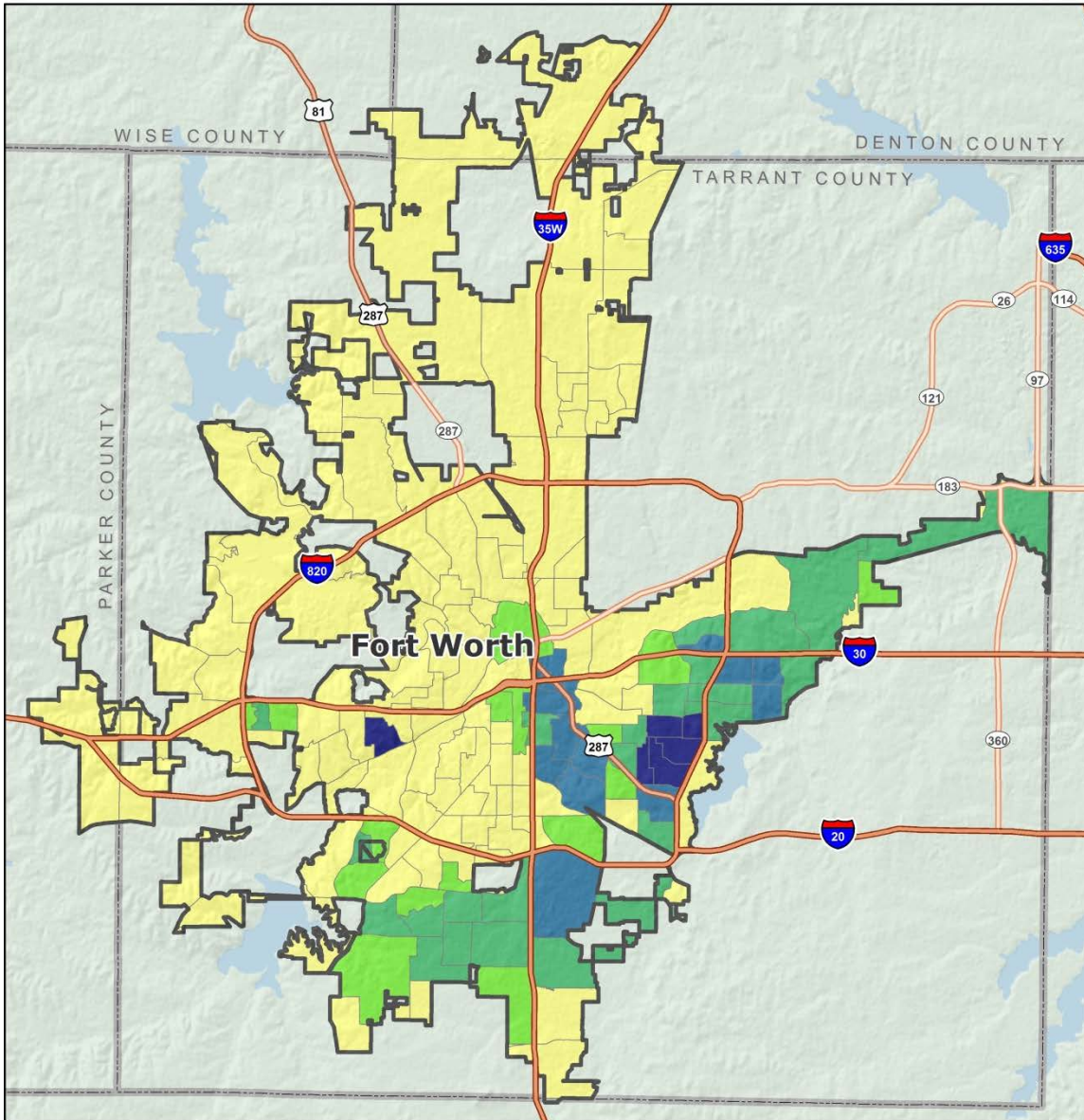
- County Boundaries (dashed line)
- City Boundaries (solid line)
- Census Tracts (thin solid line)
- Major Roads (thick orange line)

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: 2000 Census

0 3 Miles

Map II.2
Percent Black Population by Census Tract
 City of Fort Worth
 2010 Census Data



LEGEND

2010 Black Population
 2010 Average Percent Black Population in Fort Worth = 18.9%
 Disproportionate Share Threshold = 28.9%

Percent Black	Color
0.0% - 18.9%	Light Yellow
19.0% - 28.9%	Light Green
29.0% - 51.4%	Medium Green
51.5% - 68.6%	Dark Green
68.7% - 85.7%	Dark Blue

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

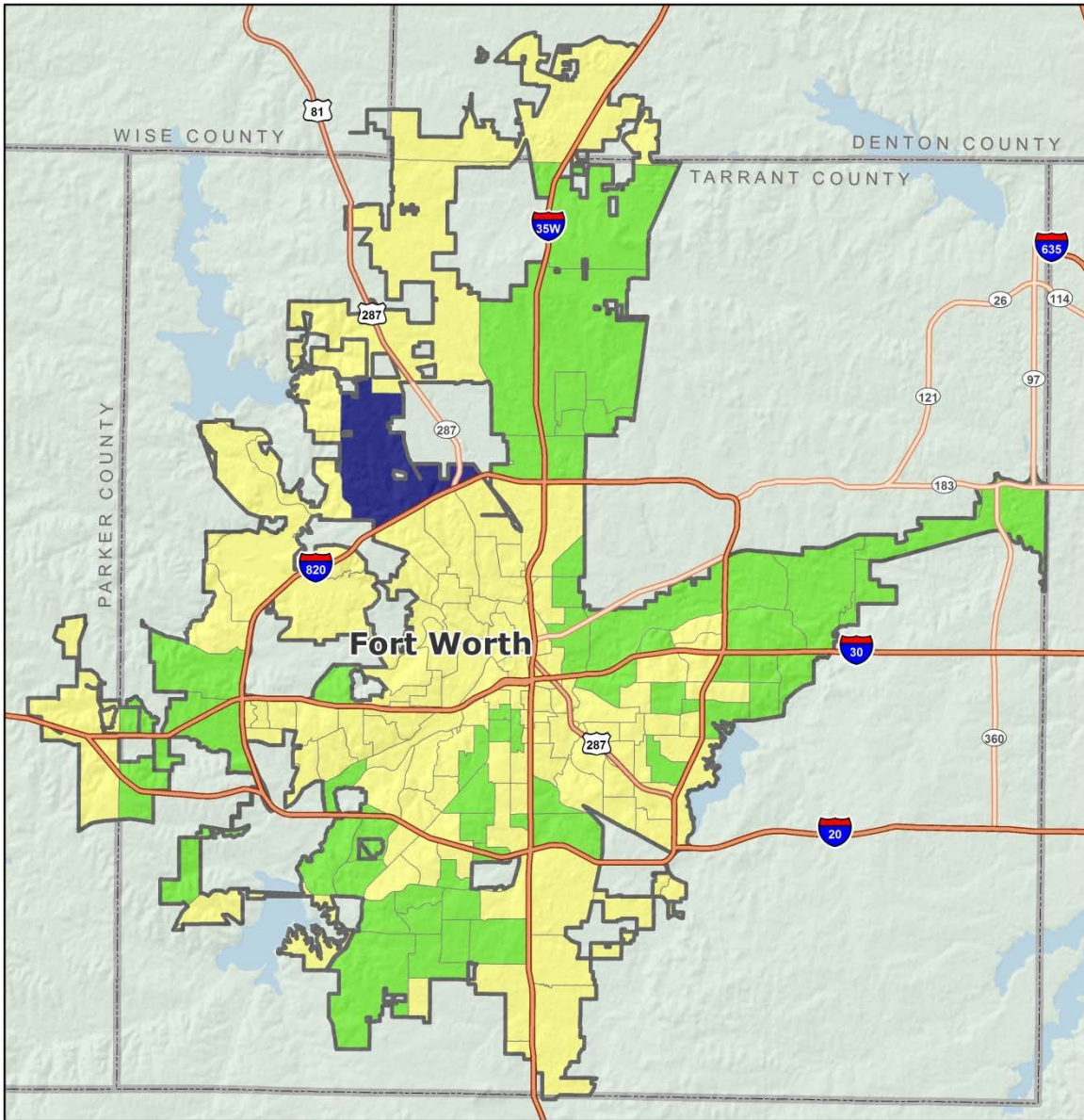
Data Source: Census 2010

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Disproportionate Share Threshold

0 3 Miles

Map II.3
Percent Asian Population by Census Tract
 City of Fort Worth
 2000 Census Data



LEGEND

2000 Asian Population
 2000 Average Percent Asian Population in Fort Worth = 2.6%
 Disproportionate Share Threshold = 12.6%

Percent Asian	Color
0.0% - 2.6%	Light Yellow
2.7% - 12.6%	Light Green
13.7% - 15.5%	Medium Green
15.6% - 17.0%	Dark Green
17.1% - 19.3%	Dark Blue

Disproportionate Share Threshold

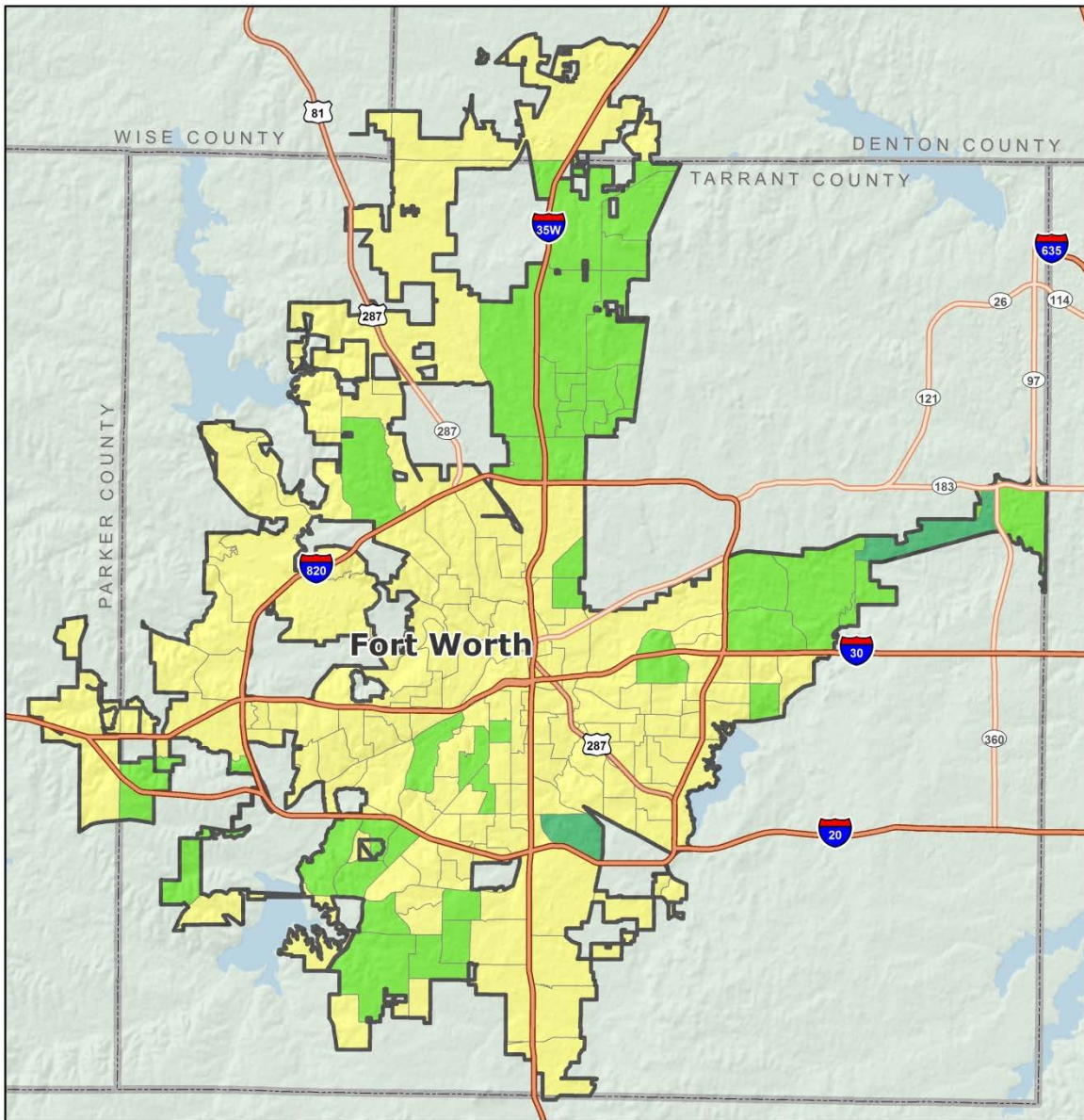
- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: 2000 Census

0 3 Miles

Map II.4
Percent Asian Population by Census Tract
 City of Fort Worth
 2010 Census Data



LEGEND

2010 Asian Population
 2010 Average Percent Asian Population in Fort Worth = 3.7%
 Disproportionate Share Threshold = 13.7%

Percent Asian	Color
0.0% - 3.7%	Yellow
3.8% - 13.7%	Light Green
13.8% - 17.0%	Medium Green
17.1% - 20.0%	Dark Green
20.1% - 23.0%	Dark Blue

Disproportionate Share Threshold

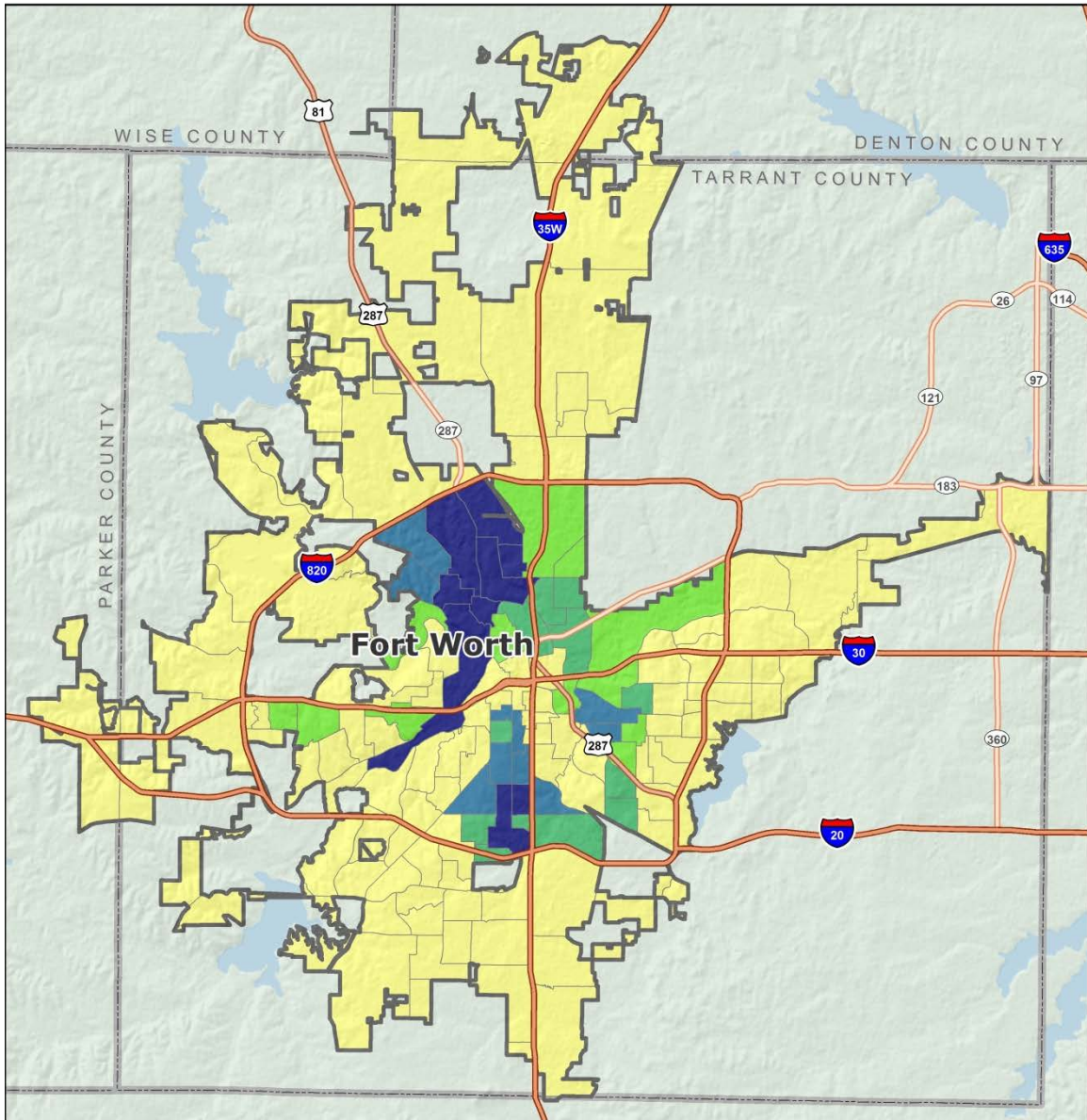
- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: Census 2010

0 3 Miles

Map II.5
Percent Hispanic Population by Census Tract
 City of Fort Worth
 2000 Census Data



LEGEND

2000 Hispanic Population
 2000 Average Percent Hispanic Population in Fort Worth = 29.8%
 Disproportionate Share Threshold = 39.8%

Percent Hispanic	Color
1.5% - 29.8%	Light Yellow
29.9% - 39.8%	Yellow-Green
39.9% - 57.0%	Green
57.1% - 75.2%	Dark Green
75.3% - 94.0%	Dark Blue

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

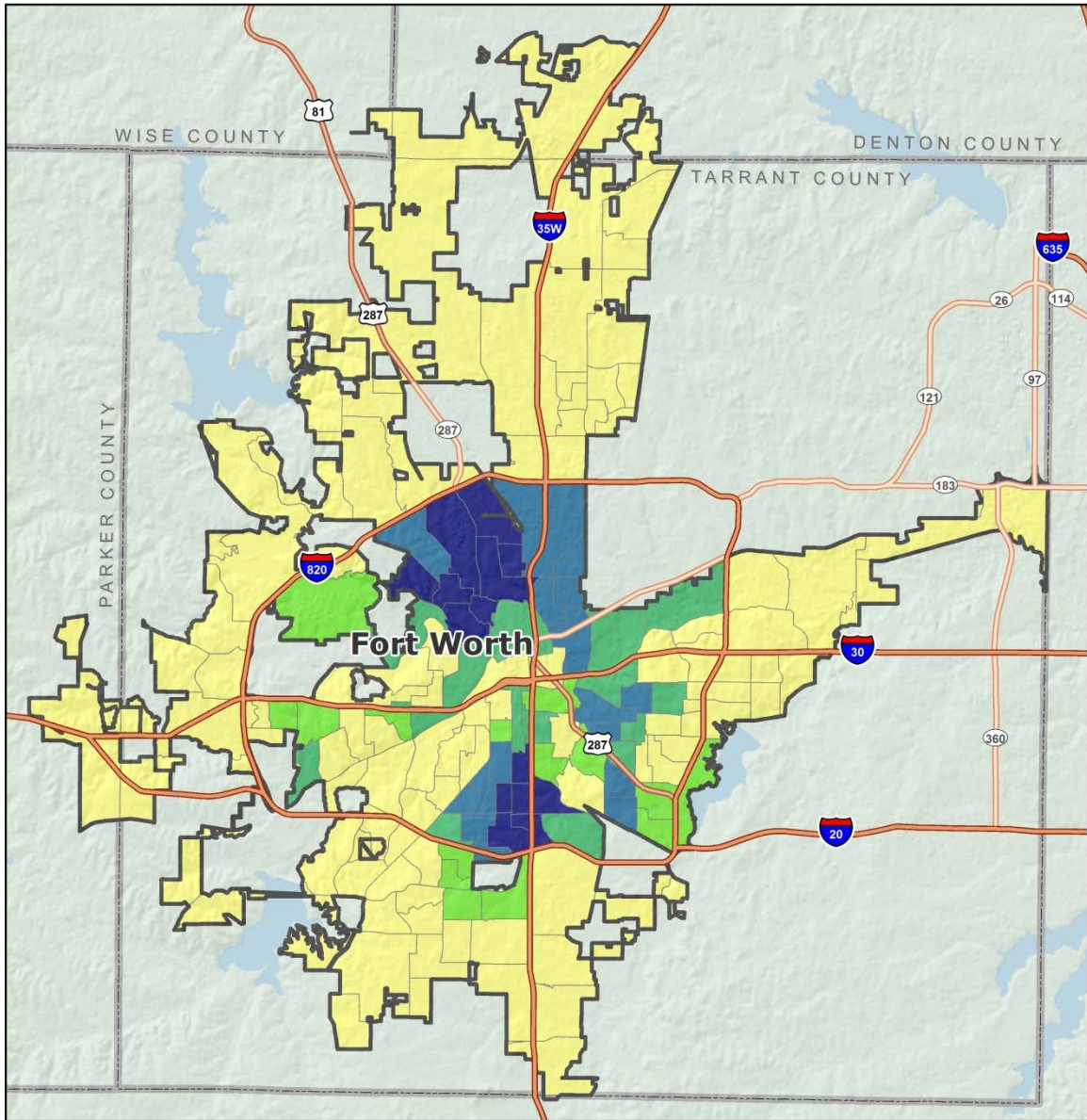
Data Source: 2000 Census

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Disproportionate Share Threshold

0 3 Miles

Map II.6
Percent Hispanic Population by Census Tract
 City of Fort Worth
 2010 Census Data



LEGEND

2010 Hispanic Population
 2010 Average Percent Hispanic Population in Fort Worth = 34.1%
 Disproportionate Share Threshold = 44.1%

Percent Hispanic
5.2% - 34.1%
34.2% - 44.1%
44.2% - 58.7%
58.8% - 76.6%
76.7% - 94.4%

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: Census 2010

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Disproportionate Share Threshold

0 3 Miles

Map II.7, on the following page, shows that in 2000, the white population was disproportionately concentrated in the western portion of the City, largely in the outlying areas of town. Census tracts within the beltway generally held an average or below-average share of white residents, with the exception of the western and southwestern portions of that area. The share of white residents was as high as 98.3 percent in some areas. The average percent white population per tract in Fort Worth increased to 61.1 percent in 2010. Map II.8 reveals that in 2010, the white population became less concentrated in several areas in the eastern and southern parts of the City. White residents still remained disproportionately concentrated in the western part of the City in 2010.

In summary, each of the racial and ethnic groups discussed above tended to be concentrated in particular areas of Fort Worth, and these concentrations remained largely intact between the 2000 and 2010 Censuses.

DISABILITY STATUS

The Census Bureau defines disability as a lasting physical, mental, or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes him or her from being able to go outside the home alone or to work.

Among all persons aged 5 years or older, 21 percent were disabled in Fort Worth in 2000, a slightly higher figure than the 19.4 percent national disability rate at that time. This share represented 100,597 persons living with a disability in the City, including 4,999 persons between the ages of 5 and 15 and 21,593 persons aged 65 or older. These data are displayed below in Table II.5. The 2011 three-year ACS estimates showed that only 9.9 percent of persons of all ages were disabled, a marked decrease from 2000 (See Table II.6)

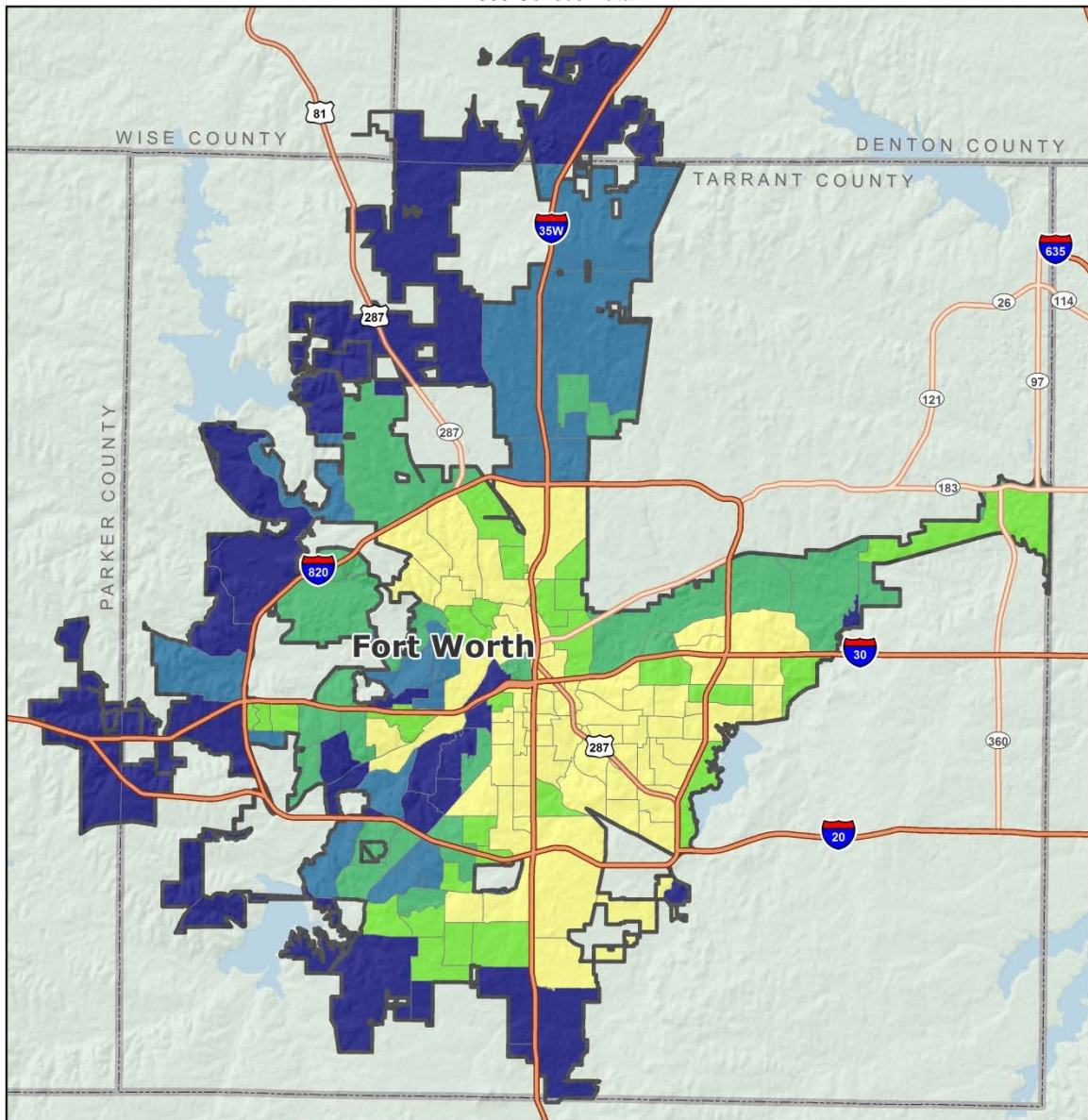
Table II.5
Disability by Age
City of Fort Worth
2000 Census SF3 Data

Age	Total	
	Disabled Population	Disability Rate
5 to 15	4,999	5.5%
16 to 64	74,005	21.7%
65 and older	21,593	45.0%
Total	100,597	21.0%

Table II.6
Disability by Age
City of Fort Worth
2011 Three-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	246	.7%	123	.4%	369	.5%
5 to 17	4,074	5.4%	2,526	3.3%	6,600	4.4%
18 to 34	5,054	5.5%	4,482	4.5%	9,536	5.0%
35 to 64	14,568	11.2%	17,879	13.1%	32,447	12.2%
65 to 74	4,421	31.2%	4,904	27.3%	9,325	29.0%
75 or Older	4,702	51.2%	9,454	55.9%	14,156	54.3%
Total	33,065	9.3%	39,368	10.4%	72,433	9.9%

Map II.7
Percent White Population by Census Tract
 City of Fort Worth
 2000 Census Data



LEGEND

2000 White Population
 2000 Average Percent White Population in Fort Worth = 59.7%
 Disproportionate Share Threshold = 69.7%

Percent White	Color
2.5% - 59.7%	Light Yellow
59.8% - 69.7%	Light Green
69.8% - 79.2%	Medium Green
79.3% - 88.0%	Dark Green
88.1% - 98.3%	Dark Blue

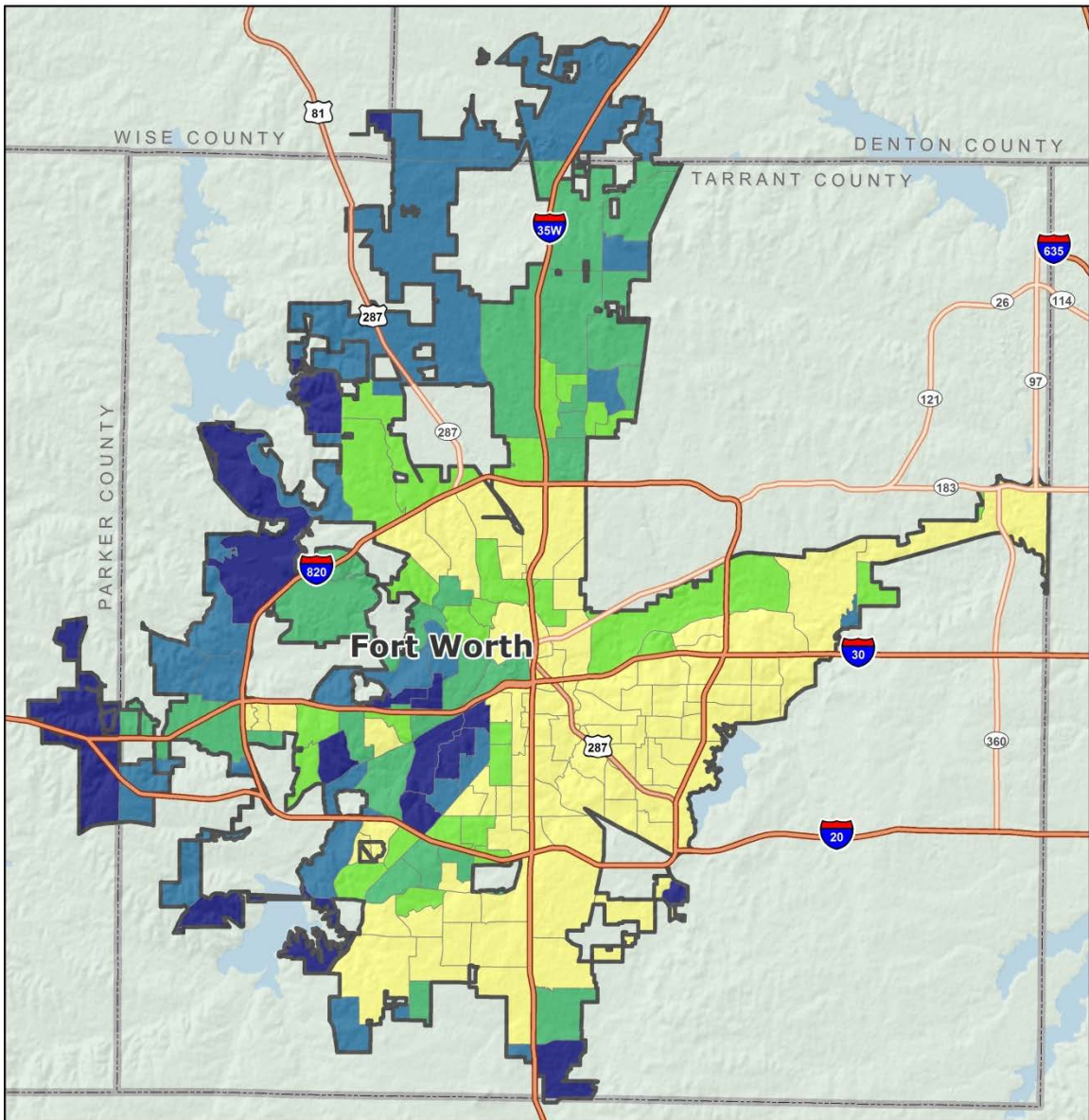
NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: Census

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

0 3 Miles

Map II.8
Percent White Population by Census Tract
 City of Fort Worth
 2010 Census Data



LEGEND

2010 White Population
 2010 Average Percent White Population in Fort Worth = 61.1%
 Disproportionate Share Threshold = 71.1%

Percent White
5.3% - 61.1%
61.2% - 71.1%
71.2% - 80.0%
80.1% - 88.0%
88.1% - 95.4%

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: Census 2010

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Disproportionate Share Threshold

0 3 Miles

Data from the 2007 to 2010 ACS are not available by Census tract—the geographic distribution of the disabled population in Fort Worth as of the 2000 Census is presented in Map II.9, on the following page. As shown, only a few Census tracts held disproportionate shares of the disabled population; these tended to be centralized, though a few tracts on the outskirts of town held a disproportionate share of residents with disabilities. The highest concentration of residents with disabilities was in a census tract immediately to the south of I-30 and to the west of I-35W, where 47.2 percent of residents had a physical or mental disability.

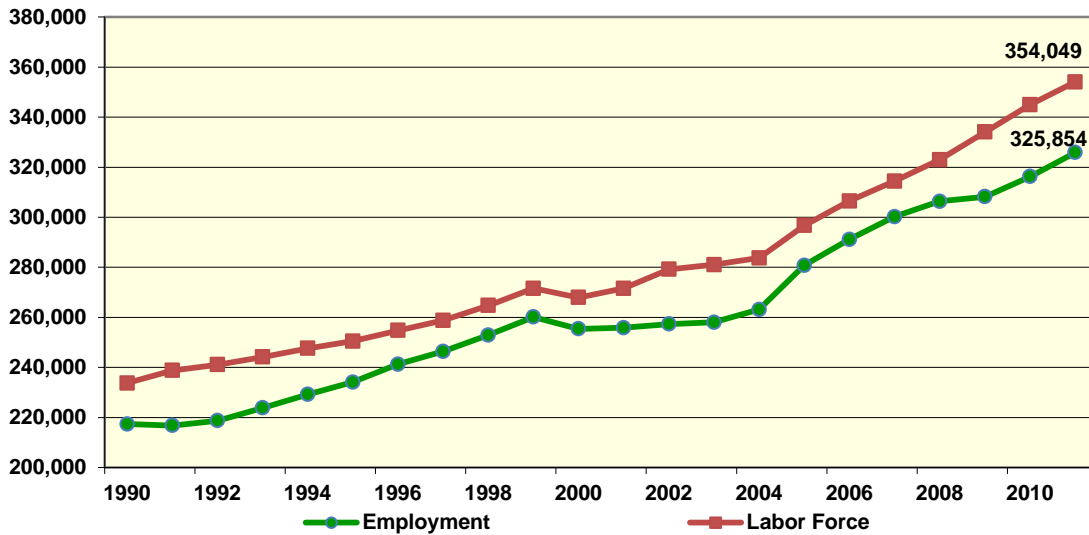
B. ECONOMICS

Data indicating the size and dynamics of Fort Worth’s job markets, workforce, incomes, and persons in poverty provide contextual background of City residents when making a housing choice. The following presents this information.

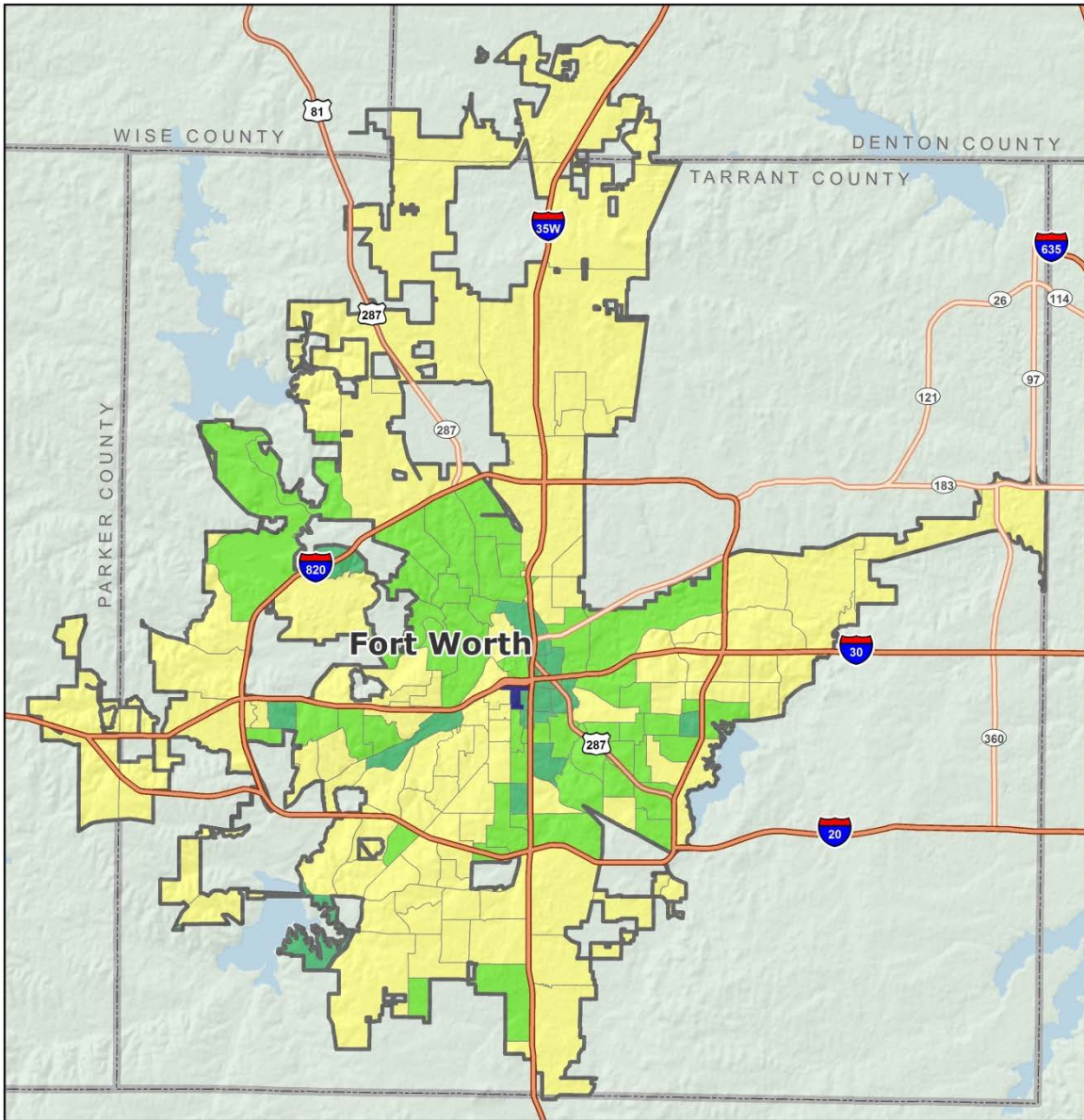
LABOR FORCE AND EMPLOYMENT

Data from the Bureau of Labor Statistics (BLS) regarding the labor force, defined as the total number of persons working or looking for work is presented below in Diagram II.1, have been on an overall upward track since 1990.

Diagram II.1
Total Employment and Labor Force Participation
 City of Fort Worth
 Bureau of Labor Statistics 1990-2012



Map II.9
Disabled Population by Census Tract
 City of Fort Worth
 2000 Census Data



LEGEND

2000 Percent Disabled Population
 2000 Average Percent Disabled Population in Fort Worth = 21.0%
 Disproportionate Share Threshold = 31.0%

Percent Disabled	Color
0.6 - 21.0%	Yellow
21.1% - 31.0%	Light Green
31.1% - 37.0%	Medium Green
37.1% - 42.0%	Dark Green
42.1% - 47.2%	Dark Blue

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.
 Data Source: 2000 Census

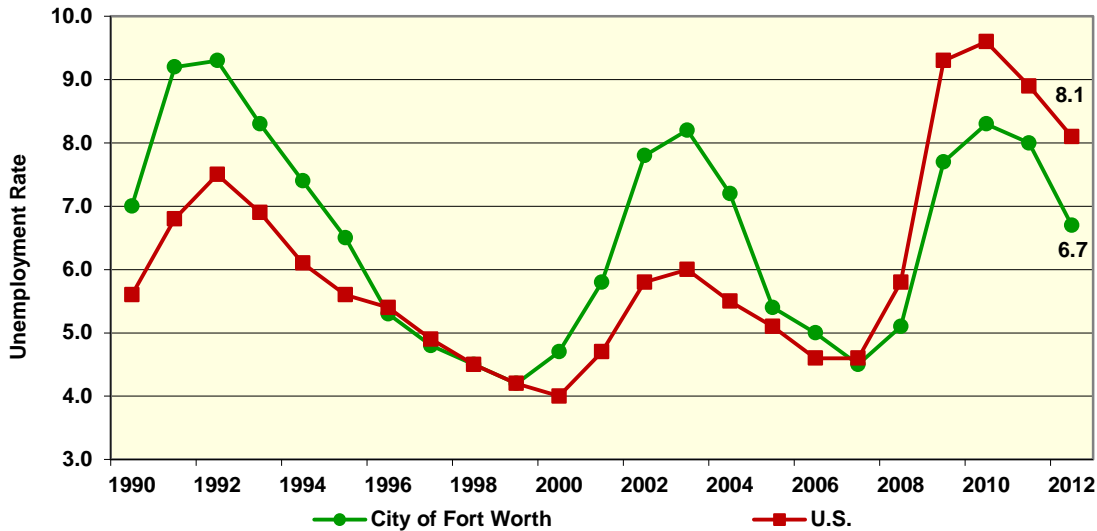
- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Disproportionate Share Threshold

0 3 Miles

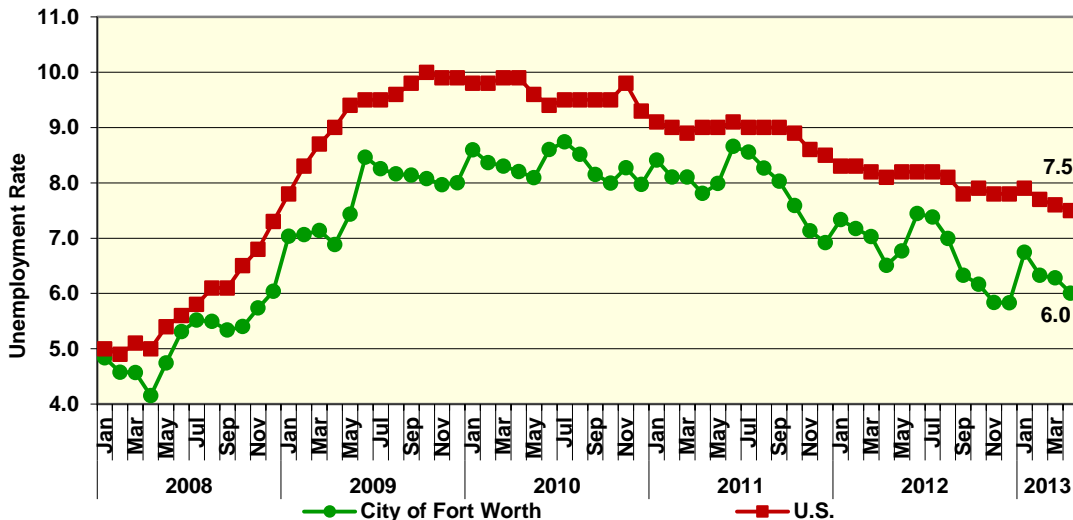
The gap between the labor force and the number of employed persons represents the number of persons without jobs. As seen in Diagram II.2., unemployment in Fort Worth before 2008 was generally higher than the national rate, though since that year it has been lower. In 2012, the unemployment rate in Fort Worth was 6.7, down from a peak of 8.3 percent in 2010.

Diagram II.2
Unemployment Rate
 City of Fort Worth
 1990–2012 BLS Data



More recent monthly unemployment rate data are presented below in Diagram II.3. As shown, the unemployment rate in Fort Worth increased after 2008 but fluctuated between 2009 and 2012, ranging from 6.9 to 8.7 percent. Some seasonal employment changes were seen in the winter and late spring months of most years. By April 2013, the City’s unemployment rate stood at 6 percent compared to the nationwide rate of 7.5 percent.

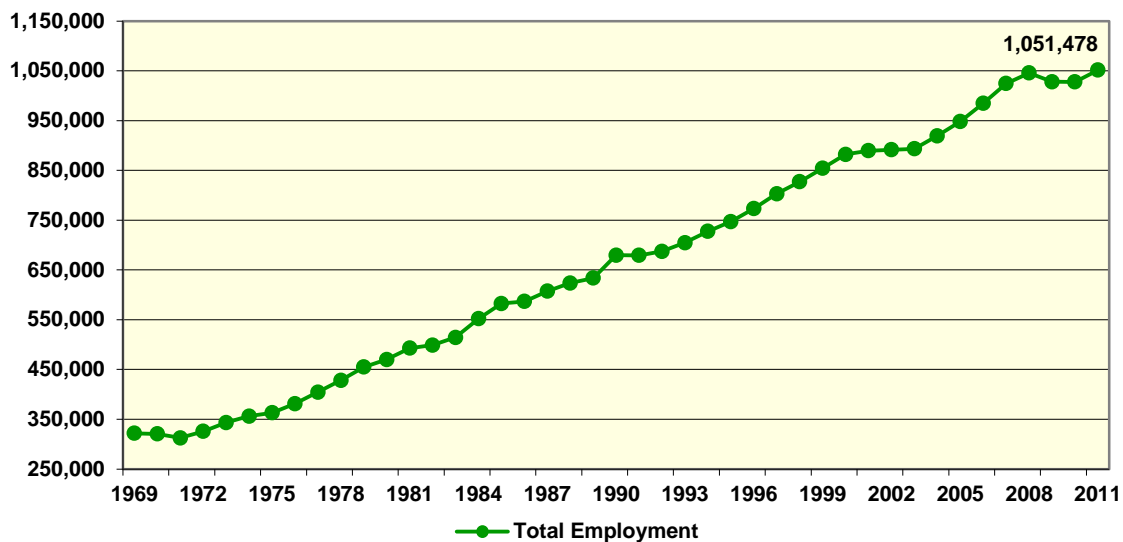
Diagram II.3
Monthly Unemployment Rate
 City of Fort Worth
 1990–2013 BLS Data



FULL- AND PART-TIME EMPLOYMENT AND EARNINGS

The Bureau of Economic Analysis (BEA) provides an alternate view of employment: a count of both full- and part-time jobs in Tarrant County.⁸ Note that a person working more than one job can be counted more than once. As shown in Diagram II.4, below, the total number of full- and part-time jobs in Tarrant County more than doubled from 1969 through 2009, increasing by more than 729,000 jobs. As with the more recent employment numbers discussed above, the general trend in total employment in the County has been steadily upward, punctuated by brief periods of relative stagnation after 1990 and 2000. This trend was broken in 2009, after total employment had peaked at 1,045,857 the year before. Following two years of decline, total employment rebounded to 1,051,478 in 2012, surpassing the total in 2008.

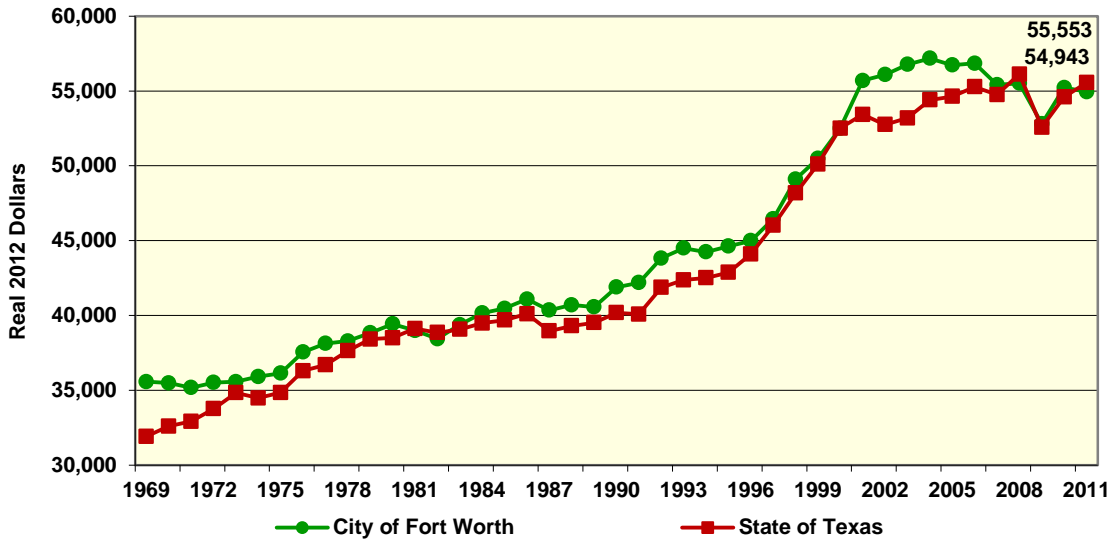
Diagram II.4
Full- and Part-Time Employment
 Tarrant County
 1969–2011 BEA Data



When the total earnings from employment is divided by the number of jobs and then deflated to remove the effects of inflation, average real earnings per job is determined. Diagram II.5, on the following page, shows that average earnings per job in Fort Worth in 2011 dollars rose from \$35,568 in 1969 to \$57,182 by 2004, and was slightly higher than the State of Texas average over most this time period. The gap widened after 2000, as real wages in Fort Worth continued to rise even as they fell across the state. However, a slow increase in real wages statewide—and moderate decrease in real wages in Fort Worth—after 2004 brought wages in the City in line with those at the state level. Real wages in Fort Worth fell to \$52,807 per job in 2009, along with the drop in wages at the state level. Both have since rebounded, if not yet to their pre-recession levels.

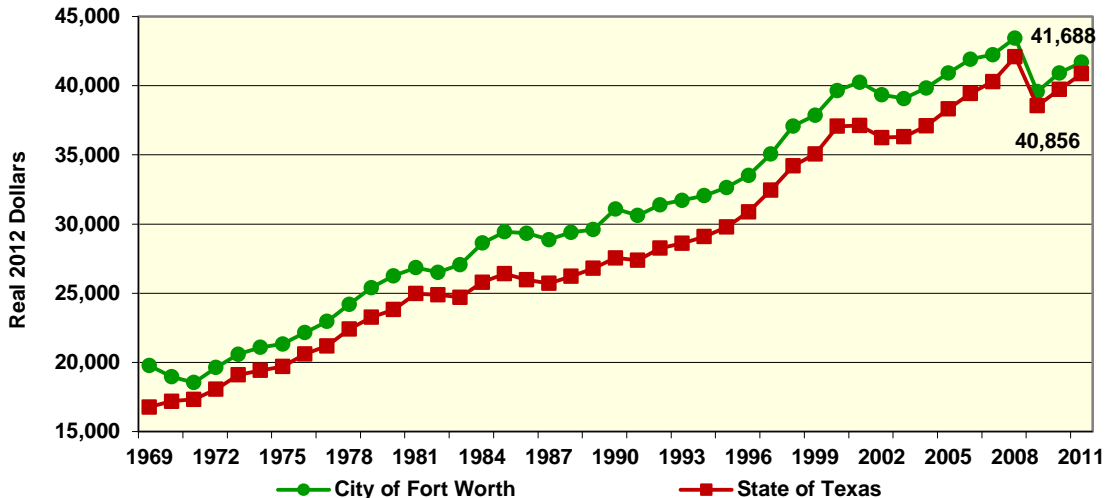
⁸ Data are, in part, from administrative records, and the most current BEA data available were through 2009. BEA data are only available at the county level.

Diagram II.5
Real Average Earnings Per Job
 The City of Fort Worth and the State of Texas
 1969–2011 BEA Data, 2012 Dollars



Another gauge of economic health is income from all sources: wages earned; transfer payments; and property income such as dividends, interest, and rents. When these figures are added together and divided by population, per capita income is determined. Diagram II.6 below compares real per capita income in Fort Worth to that in the State of Texas from 1969 through 2009. This diagram shows that per capita income in the City was consistently higher than that of the state over the period, particularly in the decade between 1985 and 1995, during which time real per capita income in Fort Worth was over \$3,000 higher than in Texas, on average. By 2008, the gap had shrunk considerably, and per capita income at the state and city level both fell dramatically after that year. After sinking to \$39,567 in 2009, per capita income in Fort Worth had recovered to \$41,688 by 2011.

Diagram II.6
Real Per Capita Income
 The City of Fort Worth and the State of Texas
 1969–2011 BEA Data, 2012 Dollars



HOUSEHOLD INCOME

Table II.7, below, presents the number of households in Fort Worth by income range, as derived from the 2000 Census count and the 2011 five-year ACS estimates. In 2000, 17.5 percent of households had incomes under \$15,000, and an additional 7.1 percent had incomes between \$15,000 and \$24,999. In that year, a majority (64.4 percent) of households made less than \$50,000. Estimates based on 2011 Five-Year ACS data signal a dramatic shift in income by household, to the point that households making over \$50,000 per year represented a slim majority of all households (50.4 percent) over the period between 2007 and 2011.

Table II.7
Households by Income

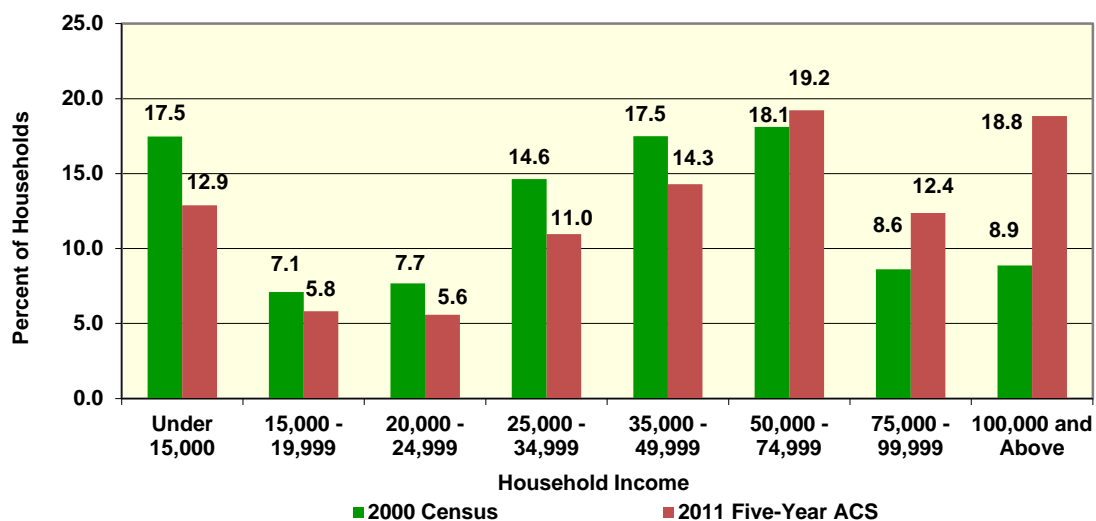
City of Fort Worth
2000 Census SF3 & 2011 Five-Year ACS Data

Income	2000 Census		2011 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than \$15,000	34,144	17.5%	33,199	12.9%
\$15,000 to \$19,999	13,877	7.1%	15,009	5.8%
\$20,000 to \$24,999	15,010	7.7%	14,397	5.6%
\$25,000 to \$34,999	28,592	14.6%	28,204	11.0%
\$35,000 to \$49,999	34,179	17.5%	36,796	14.3%
\$50,000 to \$74,999	35,369	18.1%	49,513	19.2%
\$75,000 to \$99,999	16,814	8.6%	31,856	12.4%
\$100,000 or More	17,324	8.9%	48,510	18.8%
Total	195,309	100.0%	257,484	100.0%

Diagram II.7, below, presents these income distributions graphically and further demonstrates the shift from lower- to medium- and higher-income households over time.

Diagram II.7
Households by Income

City of Fort Worth
2000 Census SF3 & 2011 Five-Year ACS Data



POVERTY

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for its size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid, and food stamps. Poverty is not defined for persons in military barracks, institutional group quarters, or for unrelated individuals under age 15 such as foster children.

In Fort Worth, the poverty rate in 2000 was 15.9 percent, with 82,953 persons considered to be living in poverty, as shown on the following page in Table II.8. 12,502 children aged 6 and below were counted as living in poverty at that time, in addition to nearly 5,600 persons aged 65 and older. 2011 Five-Year ACS data showed that poverty in the City increased to an average of 18.1 percent between 2007 and 2011.

Table II.8
Poverty by Age

City of Fort Worth
2000 Census SF3 & 2011 Five-Year ACS Data

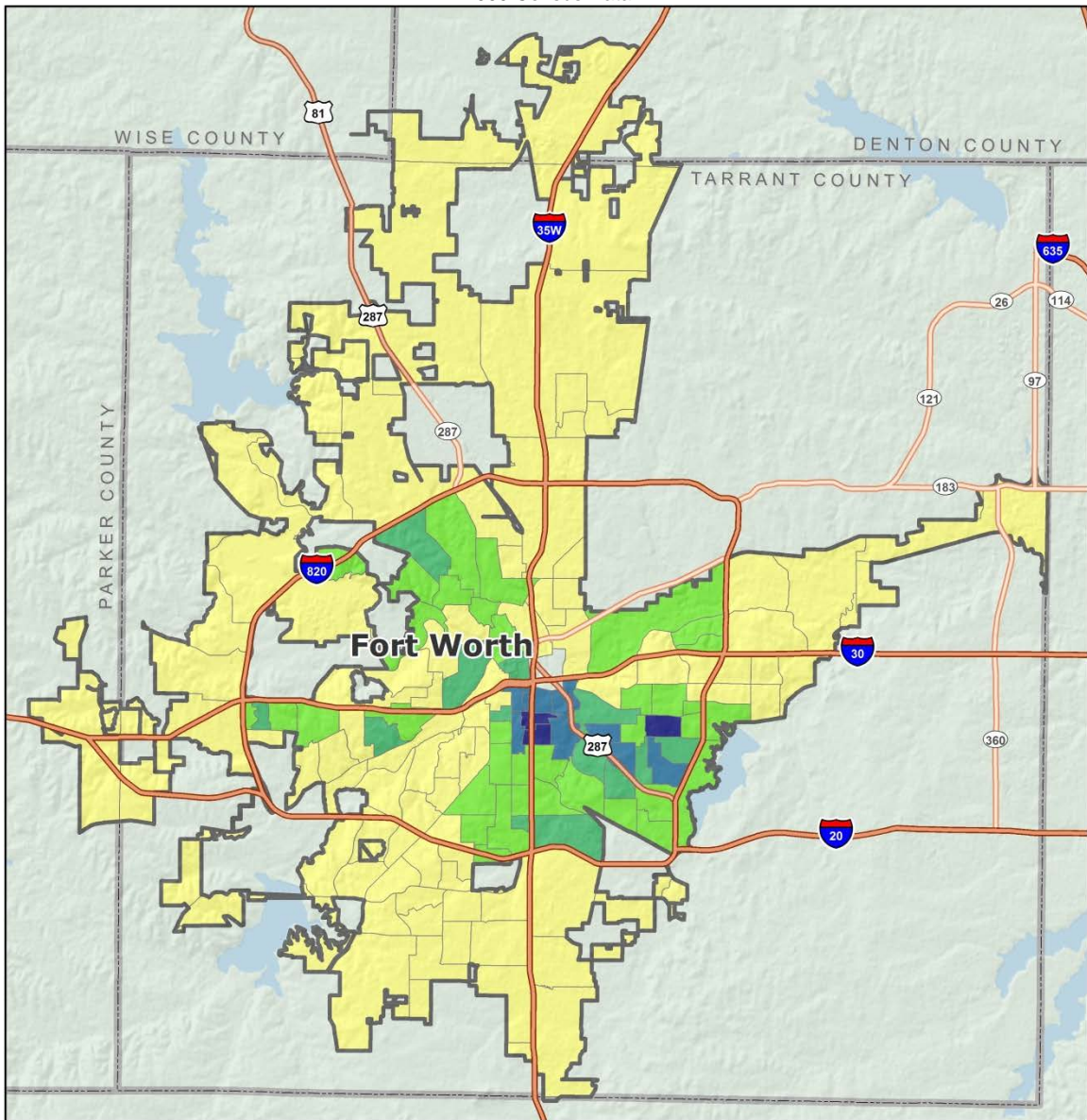
Age	2000 Census		2011 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	12,502	15.1%	22,711	17.6%
6 to 17	19,948	24.0%	31,762	24.7%
18 to 64	44,904	54.1%	67,668	52.6%
65 or Older	5,599	6.7%	6,551	5.1%
Total	82,953	100.0%	128,692	100.0%
Poverty Rate	15.9%	.	18.1%	.

Poverty was not distributed evenly throughout the City, as some Census tracts had much higher rates of poverty than others. While disproportionate and high shares of persons in poverty can be troubling, they do not on their own imply impediments to fair housing choice and do not necessarily affect persons in protected classes. However, these shares may be the result of an impediment, such as a lack of adequate job opportunities that disparately impacts members of protected classes.

Map II.10, on the following page, presents the poverty rates in 2000 geographically. Census tracts that had a disproportionate share of persons living in poverty were those areas where the poverty rate was greater than 25.9 percent. The highest levels of poverty were seen inside beltway, particularly in the southeast.

By 2010, the average poverty rate per Census tract had increased from 15.9 to 18.1 percent. Map II.11, immediately following Map II.10, presents poverty data for the City of Fort Worth as derived from 2011 ACS averages. According to these data, disproportionately impoverished Census tracts accounted for a larger area of Fort Worth than they had in 2000. Growth in the number of tracts with disproportionately high rates of poverty was particularly pronounced in the area north of I-30, and while none of the tracts south of I-20 had displayed a disproportionate share of poverty in 2000, several did so between 2007 and 2011.

Map II.10
Poverty Rate by Census Tract
 City of Fort Worth
 2000 Census Data



LEGEND

2000 Poverty Rates
 2000 Average Poverty Rate in Fort Worth = 15.9%
 Disproportionate Share Threshold = 25.9%

Poverty Rate
0.0 - 15.9%
16.0% - 25.9%
26.0% - 32.7%
32.8% - 45.0%
45.1% - 62.2%

Disproportionate Share Threshold

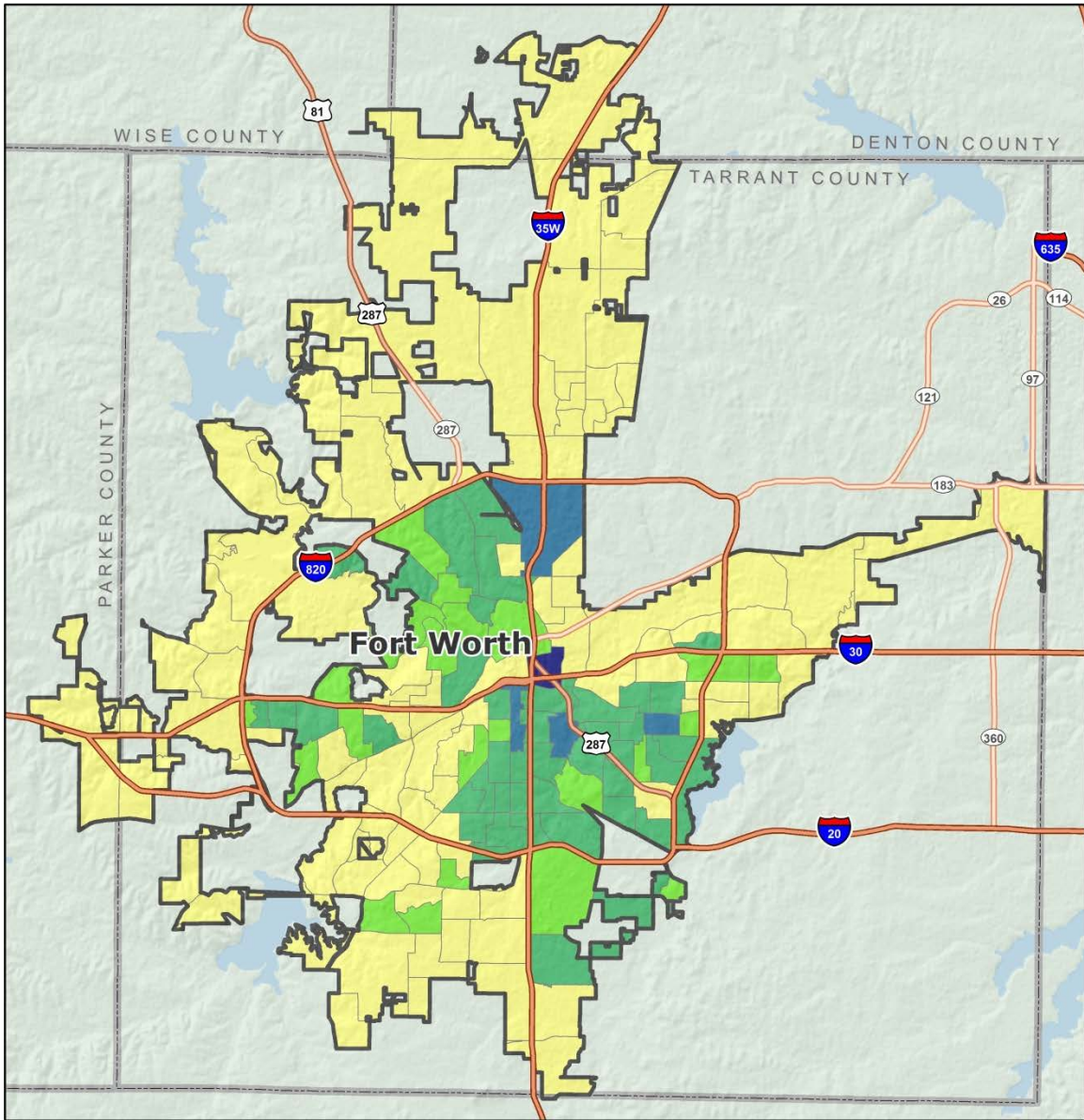
- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: 2000 Census

0 3 Miles

Map II.11
Poverty Rate by Census Tract
 City of Fort Worth
 2011 Five-Year ACS Data



LEGEND

2011 Poverty Rates
 2007-2011 Average Percent Poverty Rate in Fort Worth = 18.1%
 Disproportionate Share Threshold = 28.1%

Poverty Rate	Color
0.0% - 18.1%	Yellow
18.2% - 28.1%	Light Green
28.2% - 51.4%	Green
51.5% - 68.6%	Dark Green
68.7% - 85.7%	Dark Blue

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: 2007-2011 Five-Year American Community Survey

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Disproportionate Share Threshold

0 3 Miles

C. HOUSING

Simple counts of housing by age, type, tenure, and other characteristics form the basis for the housing stock background, suggesting the available housing in the City from which residents have to choose. Examination of households, on the other hand, shows how residents use the available housing, and shows household size and housing problems such as incomplete plumbing and/or kitchen facilities. Review of housing costs reveals the markets in which housing consumers in the City can shop, and may suggest needs for certain populations.

CHARACTERISTICS OF THE HOUSING STOCK

Data regarding the number of housing units counted in Fort Worth are presented in Table II.9, at right. In total, the number of housing units increased by 37.93 percent between 2000 and 2010, from 211,165 to 291,086 units. During this time, the population of Fort Worth increased by 38.6 percent, suggesting that housing construction was on par with, if not slightly behind, population growth.

Year	Housing Units
2000 Census	211,165
2010 Census	291,086
% Change	37.93%

Table II.10, below, shows that as of 2000, the largest group of households lived in housing units built between 1980 and 1989. This era produced 39,043 units, or 20 percent of all units counted in the City. The 2007 to 2011 ACS data show that the shares of housing units constructed during most time periods before 2000 fell substantially due to the construction of units built from 2000 on. Between 2000 and 2004, 38,160 units were constructed, and 35,868 units were built after 2004. Due to the different collection methods of decennial Census and five-year ACS estimates, only the percent shares of total units in each decade of construction are comparable.

**Table II.10
Households by Year Home Built**
City of Fort Worth
2000 Census SF3 & 2011 Five-Year ACS Data

Year Built	2000 Census		2011 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	17,183	8.8%	19,427	7.5%
1940 to 1949	19,308	9.9%	16,439	6.4%
1950 to 1959	34,246	17.5%	32,200	12.5%
1960 to 1969	27,411	14.0%	23,485	9.1%
1970 to 1979	27,358	14.0%	26,640	10.3%
1980 to 1989	39,043	20.0%	36,413	14.1%
1990 to 1999	30,597	15.7%	28,852	11.2%
2000 to 2004	.	.	38,160	14.8%
2005 or Later	.	.	35,868	13.9%
Total	195,146	100.0%	257,484	100.0%

Of the 211,165 housing units reported in Fort Worth in the 2000 Census, 65.9 percent were single-family homes. An additional 24.4 percent of units were counted as apartments, 3.2 percent were duplex units, and 4.6 percent were tri- or four-plex units. The 2011 Five-Year ACS estimates showed that single-family homes represented a larger share of the overall housing stock between 2007 and 2011, while the share of housing stock represented by all

other housing units types either fell or stayed the same. These data are presented below in Table II.11.

Table II.11
Housing Units by Type

City of Fort Worth
2000 Census SF3 & 2011 Five-Year ACS Data

Unit Type	2000 Census		2011 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	139,160	65.9%	201,153	69.8%
Duplex	6,743	3.2%	6,726	2.3%
Tri- or Four-Plex	9,661	4.6%	10,209	3.5%
Apartment	51,625	24.4%	65,128	22.6%
Mobile Home	3,786	1.8%	4,707	1.6%
Boat, RV, Van, Etc.	190	0.1%	207	0.1%
Total	211,165	100.0%	288,130	100.0%

Housing units can also be examined by tenure. Between 2000 and 2010, the number of occupied housing units increased by 34.6 percent, from 195,078 to 262,652 units. Growth in the number of owner-occupied housing units outstripped growth in the number of renter-occupied units; consequently, the share of owner-occupied units increased from 55.9 percent to 59.2 percent during this time. The number of vacant units increased by 78.2 percent over the decade, and represented a larger share of the total housing stock in 2010 than in 2000. These data are presented below in Table II.12.

Table II.12
Housing Units by Tenure

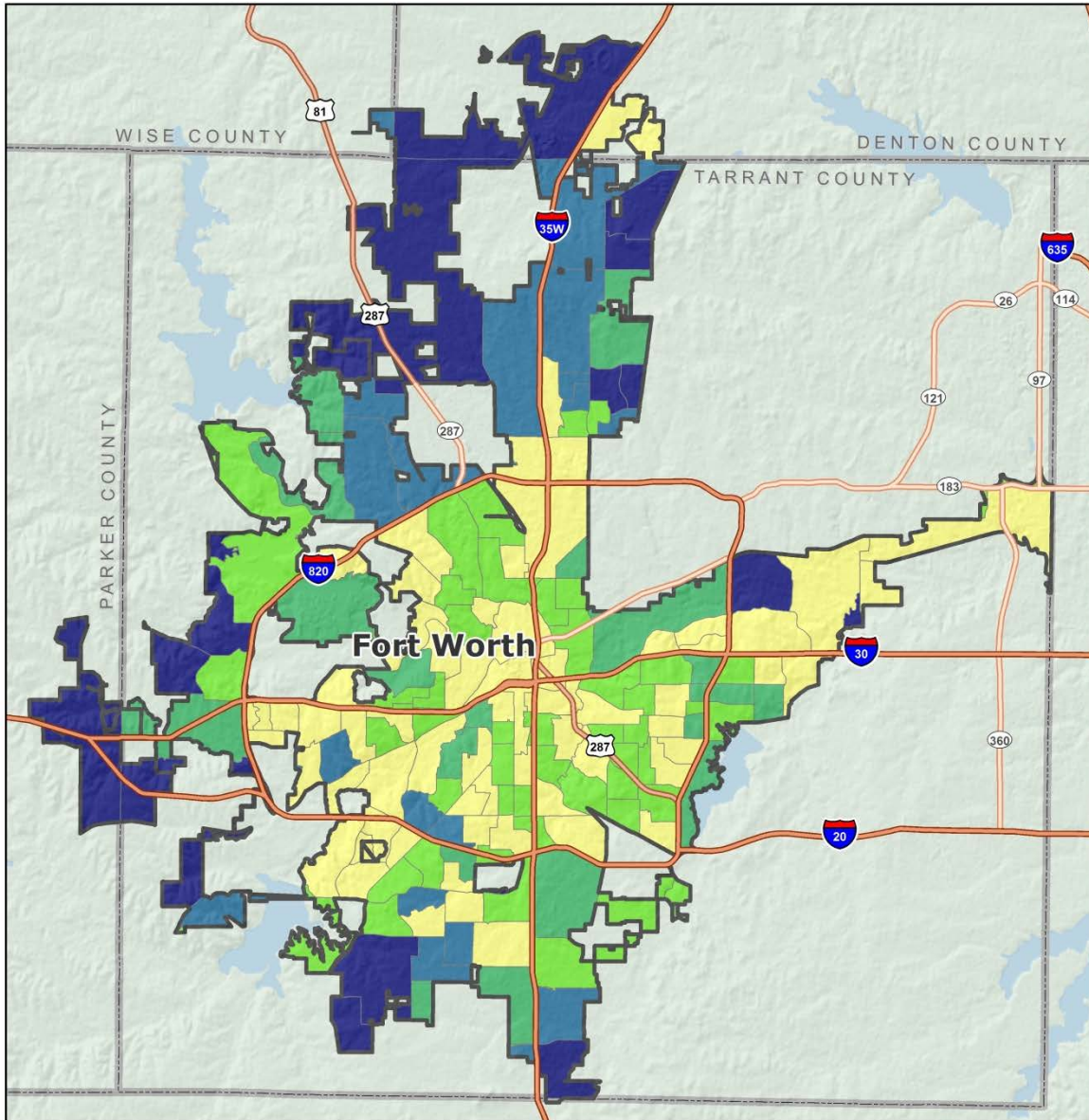
City of Fort Worth
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	195,078	92.4%	262,652	90.2%	34.6%
Owner-Occupied	109,072	55.9%	155,420	59.2%	42.5%
Renter-Occupied	86,006	44.1%	107,232	40.8%	24.7%
Vacant Housing Units	15,957	7.6%	28,434	9.8%	78.2%
Total Housing Units	211,035	100.0%	291,086	100.0%	37.93%

The geographic dispersal of owner-occupied units in Fort Worth in 2010 is presented on the following page, in Map II.12. The average percentage of owner-occupied housing was 59.2 percent in 2010, making the disproportionate share threshold 69.2 percent. Concentrations of owner-occupied housing above the disproportionate share threshold were seen throughout the City, though the highest concentrations could be seen in outlying census tracts. In these areas, over 86.1 percent—and as much as 95.1 percent—of occupied housing units were occupied by their owners.

Conversely, the average rate of renter-occupied housing per tract was 40.8 percent in 2010. Map II.13, on page 44, shows the distribution of renter-occupied housing in the City of Fort Worth. Unlike owner-occupied units, units occupied by renters tended to be more geographically concentrated. With the exception of a few census tracts in the extreme northern and western areas of Fort Worth, renter-occupied units were disproportionately represented in Census tracts within, or not far beyond, the beltway.

Map II.12
Owner-Occupied Housing Units
 City of Fort Worth
 2010 Census Data



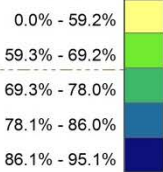
LEGEND

2010 Percent Owner-Occupied Households

2010 Average Percent Owner-Occupied Housing in Fort Worth = 59.2%

Disproportionate Share Threshold = 69.2%

Percent Owner-Occupied

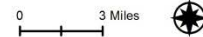


Disproportionate Share Threshold

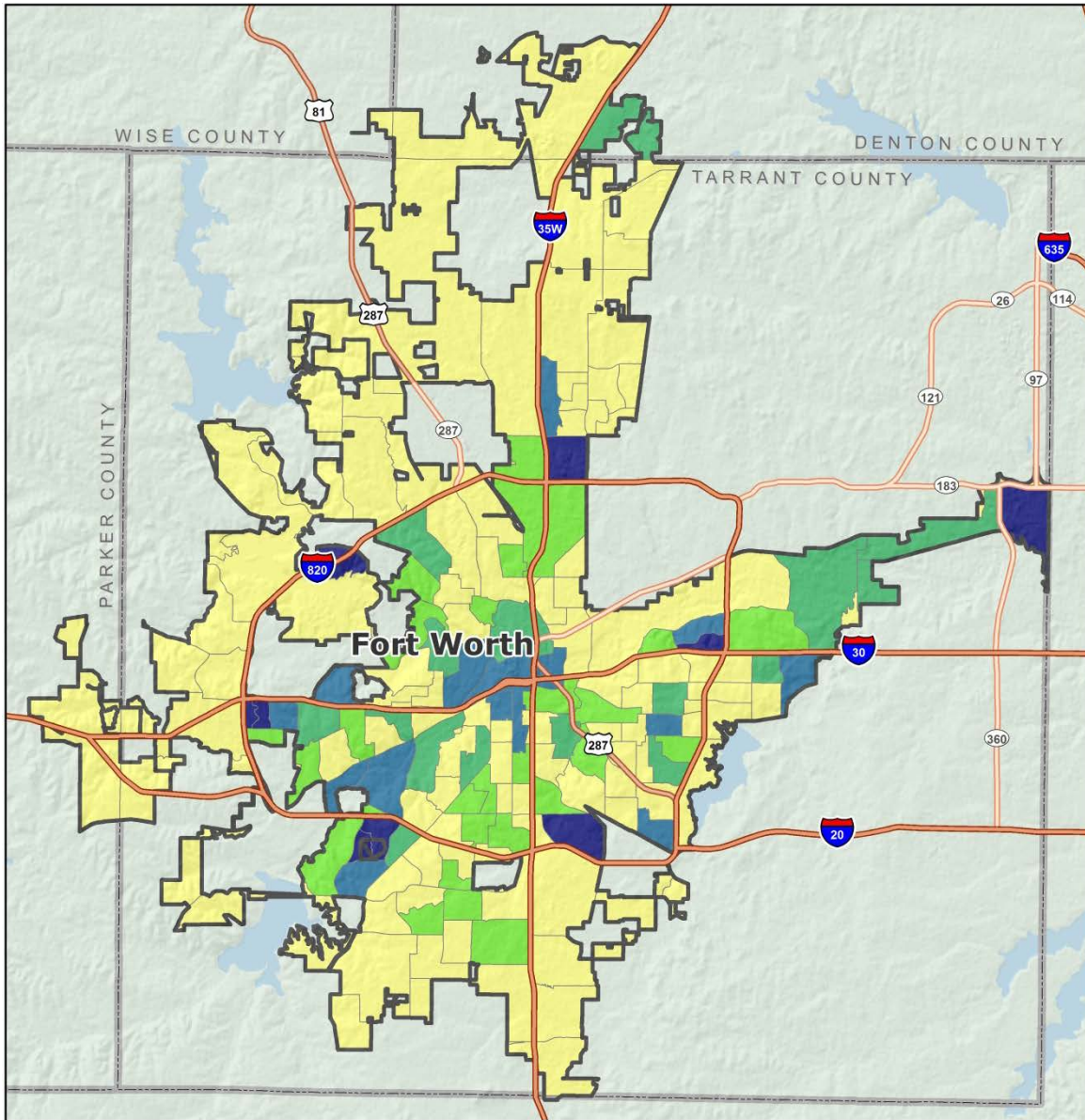
- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: Census 2010



Map II.13
Renter-Occupied Housing Units
 City of Fort Worth
 2010 Census Data



LEGEND

2010 Percent Renter-Occupied Households
 2010 Average Percent Renter-Occupied Housing in Fort Worth = 40.8%
 Disproportionate Share Threshold = 50.8%

Percent Renter-Occupied	Color
4.9% - 40.8%	Yellow
40.9% - 50.8%	Light Green
50.9% - 65.0%	Green
65.1% - 80.9%	Dark Green
81.0% - 99.9%	Dark Blue

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: Census 2010

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

0 3 Miles

VACANT HOUSING

As shown below in Table II.13, at the time of the 2000 Census, the vacant housing stock represented 15,957 units; by 2010, this figure reached 28,434. In both years, more than half of these units were available for rent, while 13 percent were for sale in 2000 and 14 percent were for sale in 2010. The number of units that were rented or sold but not occupied dropped considerably between the two. “Other vacant” units include units that are not for sale or rent, which may contribute to blight if grouped in close proximity; these units more than doubled in number between the two censuses.

Table II.13
Disposition of Vacant Housing Units

City of Fort Worth
2000 & 2010 Census SF1 Data

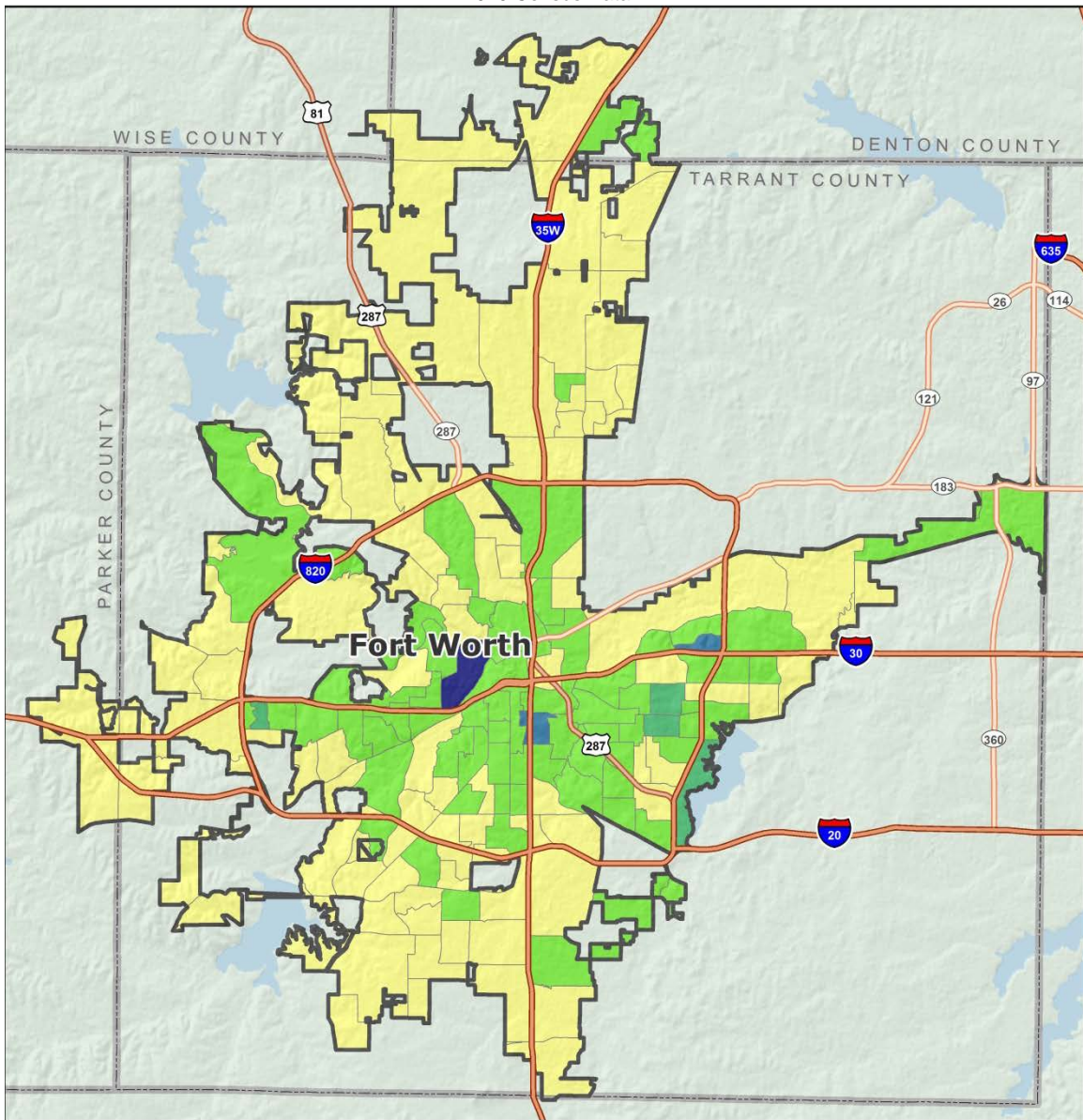
Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	8,617	54.0%	15,756	55.4%	82.85%
For Sale	2,082	13.0%	3,990	14.0%	91.64%
Rented or Sold, Not Occupied	1,819	11.4%	1,188	4.2%	-34.69%
For Seasonal, Recreational, or Occasional Use	647	4.1%	1,085	3.8%	67.70%
For Migrant Workers	4	0.0%	6	0.0%	50.00%
Other Vacant	2,788	17.5%	6,409	22.5%	129.88%
Total	15,957	100.0%	28,434	100.0%	78.2%

Map II.14, on the following page, shows the concentration of vacant units per tract in 2010. The citywide vacancy rate was 9.8 percent. A few tracts demonstrated shares of more than the disproportionate share threshold of 19.8 percent; these tended to be centrally located, but this tendency was not overwhelming. The highest concentration of vacant housing in the city (32.2 percent) was in the Census tract near Linwood, the Cultural District, and University Park.

While high numbers of vacant units can be problematic, the reasons for vacancy vary and can be temporary, as explained above. Of most concern are the “other vacant” units, because these represent units that are not available to the marketplace. When “other vacant” units are seen disproportionately in areas with high poverty rates or large low-income populations, there tend to be greater blighting influences.

Map II.15, immediately following Map II.14, shows the concentration of units per tract described as “other vacant” in the 2010 Census. The average percentage of “other vacant” units was 22.5 percent, making the disproportionate share threshold 32.5 percent. Tracts with the highest shares of “other vacant” units were generally located in the center of the City, with especially high concentrations occurring in the southeast, near the I-35W and I-820 interchange, near the I-35W and I-20 interchange, and in a census tract to the west of Lake Como park.

Map II.14
Vacant Housing Units
 City of Fort Worth
 2010 Census Data



LEGEND

2010 Percent Vacant Housing in Fort Worth
 2010 Percent of Housing Units Classified as Vacant = 9.8%
 Disproportionate Share Threshold = 19.8%

Percent Vacant

0.0% - 9.8%	Light Yellow
9.9% - 19.8%	Light Green
19.9% - 23.0%	Medium Green
23.1% - 28.0%	Dark Green
28.1% - 32.2%	Dark Blue

Disproportionate Share Threshold

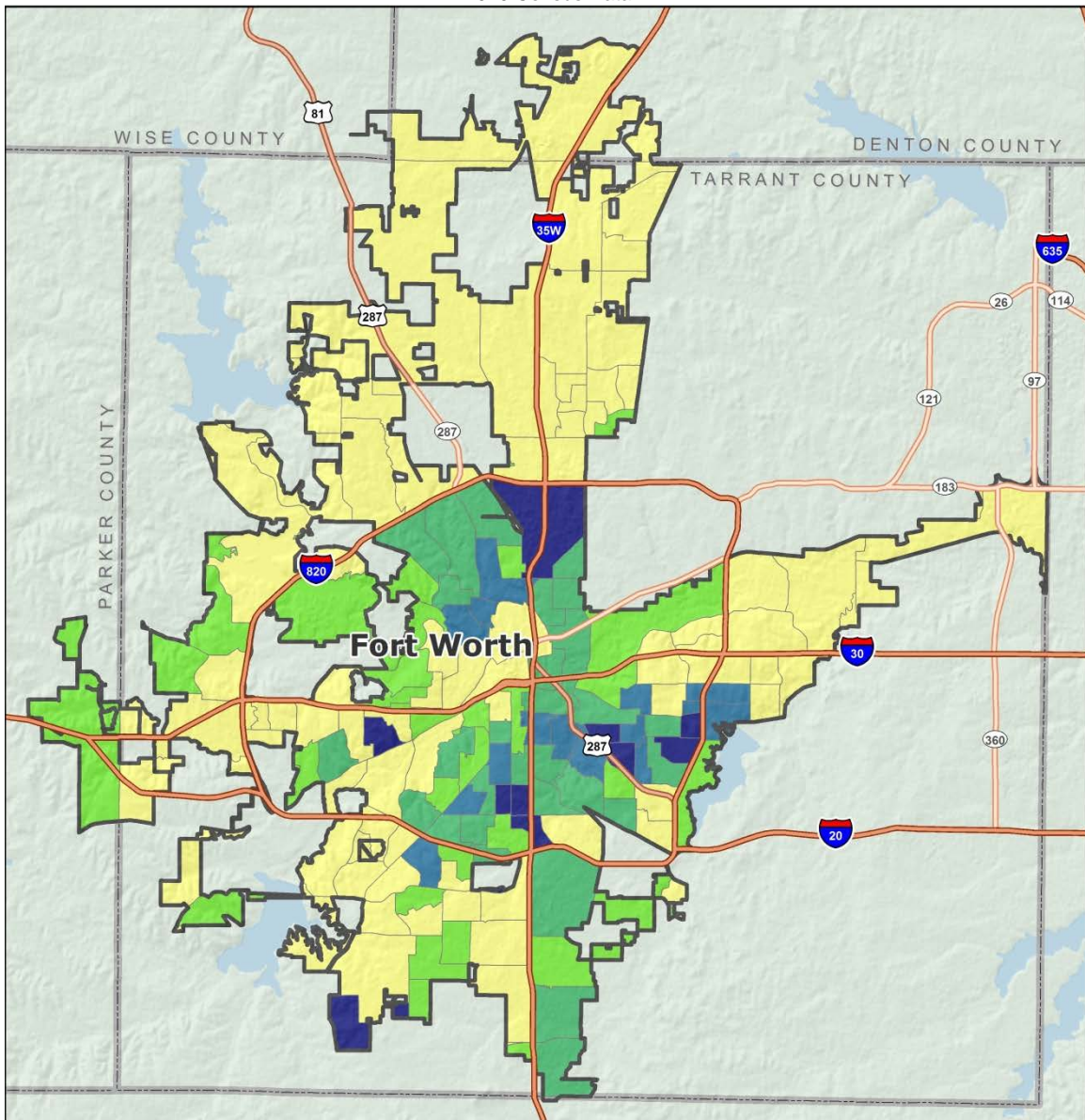
- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: Census 2010

0 3 Miles

Map II.15
“Other Vacant” Housing Units
 Fort Worth
 2010 Census Data



LEGEND

2010 Percent "Other Vacant" Housing in Fort Worth
 2010 Percent of Vacant Housing Classified as "Other Vacant" = 22.5%
 Disproportionate Share Threshold = 32.5%

NOTE: A disproportionate share exists when the share of "Other Vacant" units in a given area is at least 10 percentage points greater than the study area average.

County Boundaries
 City Boundaries
 Census Tracts
 Major Roads

Percent "Other Vacant"	
0.0% - 22.5%	
22.6% - 32.5%	
32.6% - 45.3%	
45.4% - 58.1%	
58.2% - 70.8%	

Disproportionate Share Threshold

0 3 Miles

Data Source: Census 2010

HOUSEHOLD SIZE

Housing patterns can also be examined by household size. The number of persons per household, as counted in the City at the time of the 2000 and 2010 Censuses is presented below in Table II.14. As shown, in 2000, more than 57 percent of households represented one- or two-person households, 29.3 percent represented three- or four-person households, and the remainder represented households with five persons or more. The 2010 Census registered a slight shift toward larger households, with one- and two-person households making up a smaller share of all households in 2010 than they had in 2000. Nevertheless, the number households of all sizes increased over the decade at an average growth rate of 34.6 percent.

Table II.14
Households by Household Size
 City of Fort Worth
 2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	55,757	28.6%	69,613	26.5%	24.9%
Two Persons	56,000	28.7%	72,065	27.4%	28.7%
Three Persons	31,160	16.0%	42,854	16.3%	37.5%
Four Persons	26,037	13.3%	38,368	14.6%	47.4%
Five Persons	14,244	7.3%	21,908	8.3%	53.8%
Six Persons	6,314	3.2%	9,992	3.8%	58.3%
Seven Persons or More	5,566	2.9%	7,852	3.0%	41.1%
Total	195,078	100.0%	262,652	100.0%	034.6%

HOUSING PROBLEMS

While the 2000 Census did not report significant details regarding the physical condition of housing units, some information can be derived from the one-in-six sample, which is also called SF3 data.⁹ These data relate to overcrowding, incomplete plumbing or kitchen facilities, and cost burdens. While these data were not collected during the 2010 Census, data were available for comparison from the 2007 to 2011 ACS averages.

Overcrowding occurs when a housing unit has more than one person per room but less than 1.5, with severe overcrowding occurring with 1.5 persons per room or more. At the time of the 2000 Census, 10,455 households (5.4 percent) were overcrowded and another 10,047 (5.1 percent) were severely overcrowded, as shown below in Table II.15. Overcrowding and severe overcrowding were more prevalent in renter-occupied households than owner-occupied households. 2011 Five-Year ACS data show that the incidence of overcrowding and severe overcrowding was lessened in the years between 2007 and 2011. Severe overcrowding in particular fell dramatically, from 5.1 percent of all housing in 2000 to an average of 1.1 percent between 2007 and 2011.

⁹ Summary File 3 (SF3), as defined by the U.S. Census Bureau, “consists of 813 detailed tables of [the 2000 Census] social, economic, and housing characteristics compiled from a sample of approximately 19 million housing units (about one in six households) that received the 2000 Census long-form questionnaire.” <http://www.census.gov/census2000/sumfile3.html>. These sample data include sampling error and may not sum precisely to the 100 percent sample typically presented in the 2000 Census.

Table II.15
Overcrowding and Severe Overcrowding

City of Fort Worth
2000 Census SF3 & 2011 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	100,601	92.2%	4,756	4.4%	3,795	3.5%	109,152
2011 Five-Year ACS	148,978	96.8%	3,767	2.4%	1,168	.8%	153,913
Renter							
2000 Census	74,043	86.1%	5,699	6.6%	6,252	7.3%	85,994
2011 Five-Year ACS	97,135	93.8%	4,703	4.5%	1,733	01.7%	103,571
Total							
2000 Census	174,644	89.5%	10,455	5.4%	10,047	5.1%	195,146
2011 Five-Year ACS	246,113	95.6%	8,470	3.3%	2,901	1.1%	257,484

Incomplete plumbing or kitchen facilities are other indicators of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

At the time of the 2000 Census, 976 units (0.5 percent of all housing units in the City), were lacking complete plumbing facilities, as shown below in Table II.16. The 2007 through 2011 ACS data averages showed that the percentage of units with this issue dropped to an average 0.4 percent of all housing units in the years after 2000.

Table II.16
Households with Incomplete Plumbing Facilities

City of Fort Worth
2000 Census SF3 & 2011 Five-Year ACS Data

Households	2000 Census	2011 Five-Year ACS
With Complete Plumbing Facilities	194,170	256,346
Lacking Complete Plumbing Facilities	976	1,138
Total Households	195,146	257,484
Percent Lacking	.5%	0.4%

Table II.17, below, shows the number of housing units with incomplete kitchen facilities in the City. Both datasets reported higher percentages of units with complete kitchen facilities than incomplete plumbing facilities, with 0.6 percent of total units counted as having incomplete kitchens in 2000. ACS data showed that the percentage of units with incomplete kitchen facilities increased to an average of 0.8 percent for the years between 2007 and 2011.

Table II.17
Households with Incomplete Kitchen Facilities

City of Fort Worth
2000 Census SF3 & 2011 Five-Year ACS Data

Households	2000 Census	2011 Five-Year ACS
With Complete Kitchen Facilities	193,943	255,520
Lacking Complete Kitchen Facilities	1,203	1,964
Total Households	195,146	257,484
Percent Lacking	.6%	.8%

The third type of housing problem reported in the 2000 Census was cost burden, which occurs when a household has gross housing costs that range from 30 to 49.9 percent of gross household income; severe cost burden occurs when gross housing costs represent 50 percent or more of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent plus utility charges.

Table II.18, on the following page, shows that 15.7 percent of households were cost burdened and 11.4 percent were severely cost burdened in 2000. On average, the cost burden to Fort Worth residents was lower than the burden to residents of the United States as a whole, where cost-burdened and severely cost-burdened households represented 16.2 and 11.5 percent of all households, respectively.

More than 15.7 percent of homeowners with a mortgage had a cost burden and 8.4 percent had a severe cost burden, while 19.2 percent of renters had a cost burden and 16.1 percent had a severe cost burden. ACS data averages for 2007 through 2011 showed that the citywide percentages of cost-burdened and severely cost-burdened households of all types increased to 20.2 and 15.8 percent, respectively, after 2000. Increasing cost burdens during this time fell more heavily on renters than on homeowners.

Table II.18
Cost Burden and Severe Cost Burden by Tenure

City of Fort Worth

2000 Census & 2011 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	49,454	75.0%	10,355	15.7%	5,549	8.4%	557	.8%	65,915
2011 Five-Year ACS	72,362	67.1%	22,487	20.9%	12,477	11.6%	436	0.4%	107,762
Owner Without a Mortgage									
2000 Census	30,056	84.2%	2,624	7.4%	2,092	5.9%	908	2.5%	35,680
2011 Five-Year ACS	38,165	82.7%	3,859	8.4%	3,573	7.7%	554	1.2%	46,151
Renter									
2000 Census	50,949	59.4%	16,438	19.2%	13,814	16.1%	4,634	5.4%	85,835
2011 Five-Year ACS	47,785	46.1%	25,703	24.8%	24,603	23.8%	5,480	5.3%	103,571
Total									
2000 Census	130,459	69.6%	29,417	15.7%	21,455	11.4%	6,099	3.3%	187,430
2011 Five-Year ACS	158,312	61.5%	52,049	20.2%	40,653	15.8%	6,470	2.5%	257,484

Renters with a severe cost burden are at risk of homelessness. Cost-burdened renters who experience one financial setback often must choose between rent and food or rent and health care for their families. Similarly, homeowners with a mortgage who have just one unforeseen financial constraint—such as temporary illness, divorce, or the loss of employment—may face foreclosure or bankruptcy. Furthermore, households that no longer have a mortgage yet still experience a severe cost burden may be unable to conduct periodic maintenance and repair of their homes, and in turn, may contribute to a dilapidation and blight problem. All three of these situations should be of concern to policymakers and program managers.

HOUSING COSTS

The five-year ACS estimates also report data on housing costs. The median home value of owner-occupied homes increased considerably after the year 2000, from \$71,100 in that year to \$121,900 by 2011. Median gross rent increased by about 15 percent. This figure represents the average rent for units of all sizes, and increased from \$559 in 2000 to an average of \$644 in the years between 2007 and 2011. These data are presented in Table II.19 above.

Table II.19
Median Housing Costs

City of Fort Worth
2000 Census SF3 & 2011 Five-Year ACS Data

Housing Cost	2000	2010
Median Contract Rent	\$559	\$644
Median Home Value	\$71,100	\$121,900

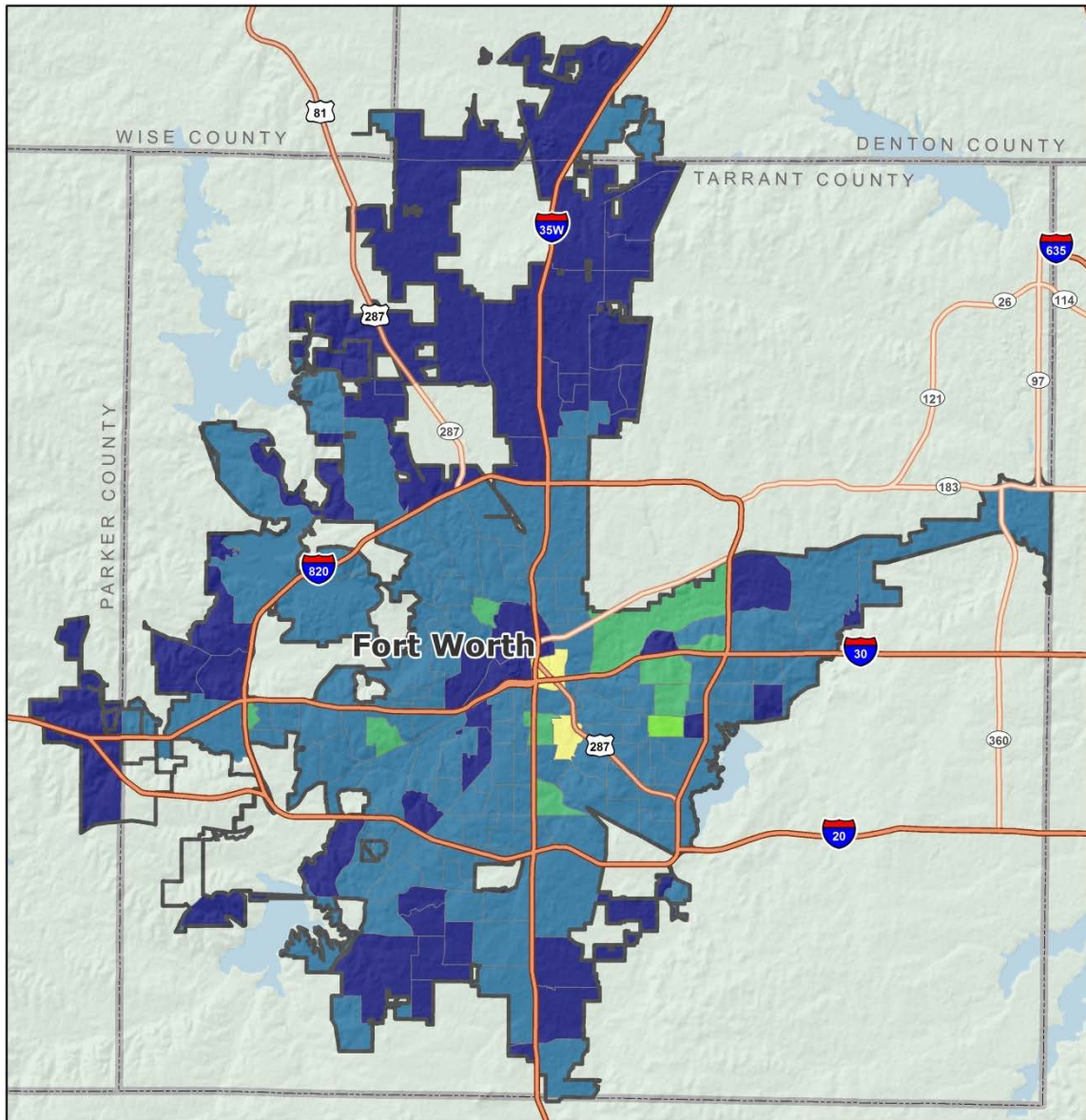
Rental Housing

Map II.16, on the following page, illustrates data on median gross rent prices by Census tract. The median gross rent over the 2007 to 2011 period in the City was \$644 per month. In general, the highest gross rents were outside of the beltway, although some of the tracts surrounding the interchange of I-35W and I-30 had median monthly rents of more than \$1,001. The lowest median rents were charged in rental units occupying tracts to the east of I-35W, which, combined with the relatively high rents charged in census tracts beyond the beltway, suggest that the bulk of affordable housing is available in central, and particularly southeastern, areas.

Owner-Occupied Housing

The distribution of owner-occupied home values in Fort Worth, as reported in the 2011 five-year ACS, is presented in Map II.17. The highest home values were seen to the west of Interstate 35W, while all census tracts between I-35W and the eastern loop of the beltway had median home values that were at or below the citywide median. The area between I-35W, I-30, and the northwest portion of the beltway also included few tracts with median home values above the city median, with the exception of a few tracts immediately to the north of I-30. While tracts with high median home values are somewhat scattered throughout the western part of Fort Worth, the overall trend is toward lower home values in the east and northwest of downtown, and higher home values in the western and peripheral census tracts.

Map II.16
Median Contract Rent
 Fort Worth
 2011 Five-Year ACS Data



LEGEND

2007-2011 Median Contract Rent
 2007-2011 Median Contract Rent in Fort Worth = \$644

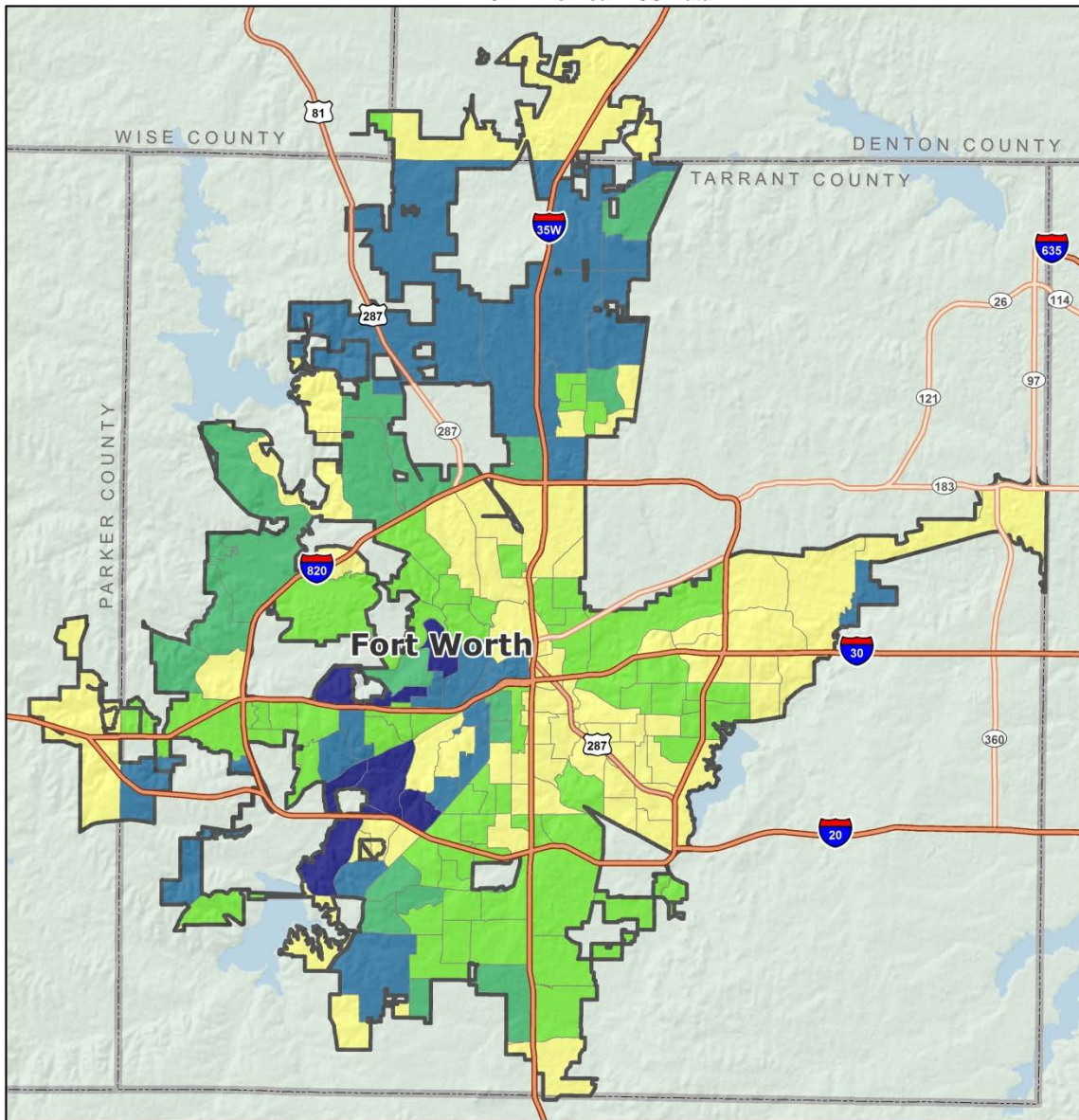
Median Contract Rent	Countywide Median
\$0 - \$351	
\$325 - \$500	
\$501 - \$644	
\$645 - \$1000	Countywide Median
\$1001 - \$1753	

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Data Source: 2007-2011 Five-Year American Community Survey

0 3 Miles

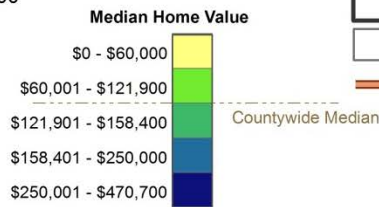
Map II.17
Median Home Value
 City of Fort Worth
 2011 Five-Year ACS Data



LEGEND

2007-2011 Median Home Values

2007-2011 Median Home Value in Fort Worth = \$121,900



- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Data Source: 2007-2011 Five-Year American Community Survey



SUMMARY

Analysis of demographic, economic, and housing data provides background context for the environments in which housing choices are made. Demographic data indicate the sizes of populations and protected classes; economic and employment data show economic factors; and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of the City's residents.

According to the Census Bureau the population of Fort Worth grew from 534,694 to 741,206 persons, or by 38.6 percent, between 2000 and 2010. During that time, the composition of the City, in terms of age, remained relatively stable as the population increased in all major age cohorts; however, the 2010 census did reflect a slight shift toward greater representation of young (aged less than 19 years) and late-middle age (55 to 64 years old) persons.

Since 2000, the racial and ethnic composition of the City also changed. Again, this is not due to a decrease in the population of any racial group but rather to differential growth rates between those populations. Of the racial groups that represented more than 1 percent of Fort Worth residents in 2000 and 2010, growth was the most pronounced in the Asian population, which grew by 95.8 percent over the decade. Those who identified their race as "Other" also increased substantially, by 58.0 percent. The white population grew at a rate that was only slightly higher than the population overall, while the black population grew at a relatively slow rate of 29.4 percent—lower than the overall growth rate—entailing that the black population represented a smaller share of Fort Worth residents in 2010 than it had in 2000.

Economic data for Fort Worth suggest that the recent recession had a larger impact on income than employment in Fort Worth. Data from the BLS showed that the labor force grew steadily from 2004 to 2011, after a slow start at the beginning of the decade. Growth in employment was less steady, slowing in 2008. As a result, unemployment increased after that year, though it never reached the levels seen nationally during the recession. On the other hand, data from the BEA showed that average earnings per job in the City decreased after 2008 after a half-decade of steady growth. The same was true of real per capita income. The poverty rate average in the City was 18.1 percent from 2007 through 2011, which represented an increase since 2000, when the poverty rate was 15.9 percent.

The number of housing units in the City increased by 37.9 percent between 2000 and 2010, or by nearly 80,000 units. Of the housing units reported in the City in the 2000 Census, more than 65.9 percent were single-family units; more recent data from the Census Bureau showed that this share increased between 2000 and the period between 2007 and 2011. The 2010 Census showed that 90.2 percent of units were occupied, down from 92.4 percent in 2000. This reduction is explained by relatively slow growth in renter-occupied housing stock, which represented a smaller share (40.8 percent) of housing stock in 2010 than it had in 2000 (44.1 percent). Owner-occupied units actually increased their share of housing stock over the decade, though the most rapid growth during this time was in the number of vacant housing units. Much of this growth, in turn, was due to a rapid expansion of vacant units classified as "other vacant", which more than doubled between 2000 and 2010. These units—which are not on the market—accounted for nearly a quarter of vacant housing stock in 2010.

There were more households of all sizes in 2010 than there were in 2000. However, relatively modest growth in the number of one- and two-person households contributed to a slight shift toward larger households over the decade, though one- to two-person households remained a majority of all households in 2010. In spite of the increasing average household size over this time, overcrowding and severe overcrowding were both less prevalent at the end of the decade than they had been at the beginning. Five-year ACS estimates from 2011 indicate that the share of households with incomplete plumbing facilities also fell slightly over the decade, though those same estimates suggest that the share of households with incomplete kitchen facilities increased slightly between 2000 and the later part of the decade.

Though reduction in the number of overcrowded units is an encouraging sign, not all of the news from the housing market was positive: households were, on average, more cost-burdened in 2010 than they had been in 2000. Overall, the proportion of cost-burdened or severely cost-burdened households increased from 27.1 percent to 36 percent over the decade, with particularly substantial growth in the number of rental households under moderate and severe cost burdens. At the same time, housing costs were seen to increase over the decade.

SECTION III. FAIR HOUSING LAW, STUDY, AND CASE REVIEW

As part of the AI process, existing fair housing laws, studies, cases, and other relevant materials were reviewed on a national and local scale. Results of this review are presented below.

A. FAIR HOUSING LAWS

FEDERAL FAIR HOUSING LAWS

A myriad of federal laws provide the backbone for U.S. fair housing regulations. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Fair Housing Act. Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).¹⁰

Title VIII was amended in 1988 (effective March 12, 1989) by the *Fair Housing Amendments Act* . . . In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.¹¹

Title VI of the Civil Rights Act of 1964. Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973. Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of the Housing and Community Development Act of 1974. Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

Title II of the Americans with Disabilities Act of 1990. Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

¹⁰ "HUD Fair Housing Laws and Presidential Executive Orders."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws

¹¹ "Title VIII: Fair Housing and Equal Opportunity."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

Architectural Barriers Act of 1968. The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975. The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972. Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.¹²

STATE AND LOCAL FAIR HOUSING LAWS

In addition to federal law, citizens of Fort Worth are protected by state and local laws, presented below.

The Texas Fair Housing Act. Designed to mirror the national Fair Housing Act, extends protections to the groups recognized by the FHA.¹³

Fort Worth Code of Ordinances. Extends federal and state fair housing protections to prohibit discrimination based on sexual orientation, transgender, gender identity, and gender expression.¹⁴

B. FAIR HOUSING STUDIES

NATIONAL FAIR HOUSING STUDIES

In 2000, HUD released a publication entitled “Discrimination in Metropolitan Housing Markets,” which measured the prevalence of housing discrimination based on race and ethnicity in the U.S. This was the third nationwide effort to measure discrimination against minority home seekers since 1977, conducted in three phases.

1. Phase 1 – Black and Hispanic Populations

The study, based on 4,600 paired tests in 23 metropolitan cities in the U.S., found large decreases in the levels of discrimination against black and Hispanic home seekers between 1989 and 2000. In the rental markets, a moderate decrease was seen in discrimination toward black individuals, who experienced adverse treatment more often than white individuals, whereas the Hispanic population was more likely to face discrimination in the rental markets than its black and white counterparts. Many black and Hispanic home seekers were told that units were unavailable, although the same units were available to white home seekers, and the black and Hispanic populations were also shown and told about fewer units. In addition, Hispanic individuals were more likely in 2000 than in 1989 to be quoted a higher rent than white individuals who sought to rent the same unit.

¹²“HUD Fair Housing Laws and Presidential Executive Orders.”

¹³ 15 Tex. Prop. Code §301.021, §301.025 <http://www.statutes.legis.state.tx.us/Docs/PR/htm/PR.301.htm>

¹⁴ Fort Worth Code of Ordinances, Ch. 17, Art. III, §17-86

[www.amlegal.com/nxt/gateway.dll/Texas/fortworth_tx/cityoffortworthtexascodeofordinances?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:fortworth_tx](http://www.amlegal.com/nxt/gateway.dll/Texas/fortworth_tx/cityoffortworthtexascodeofordinances?f=templates$fn=default.htm$3.0$vid=amlegal:fortworth_tx)

2. Phase 2 – Asian and Pacific Islander Populations

This study, conducted in 2000 and 2001 and based on 889 paired tests in 11 metropolitan areas in the U.S., showed that Asian and Pacific Islander individuals who sought to rent a unit experienced adverse treatment compared to white individuals in 21.5 percent of tests, which was similar to the rate black and Hispanic individuals saw. The study also showed that Asian and Pacific Islander prospective homebuyers experienced adverse treatment compared to white prospective homebuyers 20.4 percent of the time, with discrimination occurring in the availability of housing, inspections, assistance with financing, and encouragement by agents.

3. Phase 3 – American Indian Population

The last phase of HUD’s nationwide effort to measure housing discrimination involved estimating the level of discrimination experienced by American Indian individuals in their search for housing in metropolitan areas across Minnesota, Montana, and New Mexico. The findings showed that the American Indian population experienced adverse treatments compared to white individuals in 28.5 percent of rental tests. White individuals were consistently told about advertised units, similar units, and more units than American Indian individuals with similar qualifications. The high level of discrimination experienced by the American Indian population in these areas surpassed rates seen by Hispanic, black, and Asian individuals in the metropolitan rental markets nationwide.¹⁵

In April 2002, HUD released a national study that assessed public awareness of and support for fair housing law titled *How Much Do We Know?: Public Awareness of the Nation’s Fair Housing Laws*. The study found that only 50 percent of the population was able to identify most scenarios describing illegal conduct. In addition, 14 percent of the nationwide survey’s adult participants believed that they had experienced some form of housing discrimination in their lifetime. However, only 17 percent of those who had experienced housing discrimination had taken action to resolve the issue, such as filing a fair housing complaint. Finally, two-thirds of all respondents said that they would vote for a fair housing law.¹⁶

As a follow-up, HUD later released a study in February 2006 called *Do We Know More Now?: Trends in Public Knowledge, Support and Use of Fair Housing Law*. One aim of the study was to determine whether a nationwide media campaign had proven effective in increasing the public’s awareness of housing discrimination, and another goal was to determine the public’s desire to report such discrimination. Unfortunately, the study found that overall public knowledge of fair housing law did not improve between 2000 and 2005. As before, just half of the public knew the law regarding six or more illegal housing activities. The report showed that 17 percent of the study’s adult participants experienced discrimination when seeking housing; however, after reviewing descriptions of the perceived discrimination, it was determined that only about 8 percent of the situations might be covered by the Fair Housing Act. Four out of five individuals who felt they had been discriminated against did not file a fair housing complaint, indicating that they felt it “wasn’t worth it” or that it “wouldn’t have helped.” Others

¹⁵ “Discrimination in Metropolitan Housing Markets: National Results from Phase 1, Phase 2, and Phase 3 of the Housing Discrimination Study (HDS).” <http://www.huduser.org/portal/publications/hsgfin/hds.html>

¹⁶ U.S. Department of Housing and Urban Development, Office of Policy Development and Research. *How Much Do We Know?: Public Awareness of the Nation’s Fair Housing Laws*. April 2002. <http://www.huduser.org/portal/publications/fairhsg/hmwk.html>

did not know where to complain, assumed it would cost too much, were too busy, or feared retaliation. One positive finding of the survey was that public support for fair housing law increased from 66 percent in 2000 to 73 percent in 2005.¹⁷

In 2004, the U.S. General Accounting Office's (GAO) released a report titled *Fair Housing: Opportunities to Improve HUD's Oversight and Management of the Enforcement Process*. The GAO report found that between 1996 and 2003, the median number of days required to complete fair housing complaint investigations was 259 for HUD's Fair Housing and Equal Opportunity Offices and 195 for Fair Housing Assistance Program (FHAP) agencies—far above the 100-day mandate. However, the report did find a higher percentage of investigations completed within that time limit. The GAO report also identified the following trends between 1996 and 2003:

- The number of fair housing complaints filed each year steadily increased since 1998. An increasing proportion of grievances alleged discrimination based on disability and a declining proportion alleged discrimination based on race, although race was still the most cited basis of housing discrimination;
- FHAP agencies conducted more fair housing investigations than Fair Housing and Equal Opportunity (FHEO) agencies over the eight-year period. The total number of investigations completed each year increased slightly after declining in 1997 and 1998; and
- Over this time period, an increasing percentage of investigations closed without finding reasonable cause to believe discrimination occurred. However, a declining percentage of investigations were resolved by the parties themselves or with help from FHEO or FHAP agencies.¹⁸

In 2006, the University of Southern California and Oregon State University collaborated to study rental discrimination and race. The universities responded to 1,115 advertisements regarding apartment vacancies in Los Angeles County and signed the bottom of each email with Tyrell Jackson, a traditionally black name; Patrick McDougall, a traditionally white name; or Said Al-Rahman, a traditionally Arab name. Analysis indicated that individuals who were perceived as black were four times more likely to be discouraged from viewing an apartment than persons perceived as white, and individuals considered to be Arab were three times more likely to be discouraged from viewing an apartment than individuals who appeared white. The analysis also noted that applicants perceived as black were more likely to receive negative responses, such as the apartment was no longer available for market rate or above market rate apartments. For example, only an email signed Tyrell Jackson received a reply that reiterated the apartment cost to ensure the apartment was within the applicant's price range. The study also analyzed the responses from private property owners versus corporate property owners, but found no statistical difference in the way the two groups responded to applicants of different races.¹⁹

¹⁷ U.S. Department of Housing and Urban Development, Office of Policy Development and Research. *Do We Know More Now?: Trends in Public Knowledge, Support and Use of Fair Housing Law*. February 2006. <http://www.huduser.org/portal/publications/hsgfin/FairHsgSurvey.html>

¹⁸ U.S. General Accounting Office. "Fair Housing: Opportunities to Improve HUD's Oversight and Management of the Enforcement Process." April 2004. <http://gao.gov/products/GAO-04-463>

¹⁹ Carpusor, Adrian and William Loges. "Rental Discrimination and Ethnicity in Names." *Journal of Applied Social Psychology* 36(4).

Released by the Poverty & Race Research Action Council in January 2008, *Residential Segregation and Housing Discrimination in the United States* asserts that many current governmental efforts to further fair housing actually result in furthering unfair housing practices across the U.S. This article suggests that fair housing efforts can cause residential segregation. For example, if the majority of public housing residents are non-white and most public housing accommodations are grouped in the same Census tracts, residential segregation is resultant. Similarly, many Section 8 voucher holders are racial or ethnic minorities, and most housing that accepts Section 8 vouchers is grouped in selected areas, which again results in residential segregation. The report offers recommendations to curb such residential segregation, including dispersing public housing developments throughout cities and communities and providing greater incentives for landlords with several properties to accept the vouchers.²⁰

Published in 2009 by the National Fair Housing Alliance, *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination* presented research on the prevalence of discriminatory housing advertisements on popular websites such as Craigslist. According to the article, while newspapers are prohibited from publishing discriminatory housing advertisements, no such law exists for websites like Craigslist, as they are considered interactive internet providers rather than publishers of content. As such, they are not held to the same legal standards as newspapers. While individual landlords who post discriminatory advertisements may be held responsible, there are no such standards for companies like Craigslist that post the discriminatory advertisements. Newspapers and other publishers of content are required to screen the advertisements they accept for publishing for content that could be seen as discriminatory. This may include phrases like “no children” or “Christian only,” which violate provisions of the Fair Housing Act that state families with children and religious individuals are federally protected groups.²¹

In May 2010, the National Fair Housing Alliance published a fair housing trends report, *A Step in the Right Direction*, which indicated that recent years have demonstrated forward movement in furthering fair housing. The report began with a commendation of HUD’s federal enforcement of fair housing law and noted the agency’s willingness to challenge local jurisdictions that failed to affirmatively further fair housing. In response to the recent foreclosure crisis, many credit institutions have implemented tactics to reduce risk. However, this report suggests that policies that tighten credit markets—such as requiring larger cash reserves, higher down payments, and better credit scores—may disproportionately affect lending options for communities of color and women. *A Step in the Right Direction* concludes with examples of ways in which the fair housing situation could be further improved, including addressing discriminatory internet advertisements and adding gender identity, sexual orientation, and source of income as federally protected classes.²²

The positive note that the NFHA struck in its 2010 report carried over into the following year’s *The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination*, published by the Alliance in April of 2011. This report began by noting an

²⁰ U.S. Housing Scholars and Research and Advocacy Organizations. *Residential Segregation and Housing Discrimination in the United States*. January 2008. <http://prprac.org/pdf/FinalCERDHOHousingDiscriminationReport.pdf>

²¹ National Fair Housing Alliance. *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination*. August 2009. <http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=zgbukJP2rMM%3D&tabid=2510&mid=8347>

²² National Fair Housing Alliance. *A Step in the Right Direction: 2010 Fair Housing Trends Report*. May 2010. <http://www.nationalfairhousing.org/Portals/33/Fair%20Housing%20Trends%20Report%202010.pdf>

encouraging downward trend in the proportion of individuals in large metropolitan areas living in segregation, which had dropped from 69 to 65 percent between 2000 and 2010, according to census data from 2010. The report also highlighted the work of fair housing organizations to combat systemic and institutionalized discrimination produced by exclusionary zoning, NIMBYism, the dual credit market, and other fair housing challenges, often on limited budgets and with limited personnel. The NFHA closed its 2011 report by praising the work of private fair housing organizations while underscoring the need for continued work²³.

The 2012 report from the NFHA focused on issues of fair housing in the context of the shifting demographic composition of the United States, where the white population is projected to no longer represent a majority of residents within thirty years. The report discussed encouraging signals from HUD and the Justice Department, who have “increased their efforts and announced landmark cases of mortgage lending, zoning, and other issues that get to the heart of the [Fair Housing] Act: promoting diverse and inclusive communities²⁴.” The report also highlights a new arena for discrimination in housing, which has emerged as a result of the massive level of foreclosures in the country in recent years: uneven maintenance of Real Estate Owned (REO) properties in white and minority areas. In concluding, the report hails the creation of the Consumer Financial Protection Bureau as a new ally for fair housing and equal opportunity.²⁵

The most recent report from the NFHA outlines an ambitious policy goal: expansion of the Fair Housing Act to prohibit discrimination based on source of income, sexual orientation, gender identity, and marital status. The report relates that cases of housing discrimination in general increased between 2011 and 2012, and that complaints based on non-protected statuses (source of income, etc.) were included in that upward trend. In spite of this, only 12 states include protections based on source of income, 21 states prohibit discrimination based on sexual orientation, sixteen states protect against discrimination based on gender identity, and 22 states offer protections based on marital status (the District of Columbia also extends protections on all of these bases). In concluding the report, the NFHA advocates the modernization and expansion of the FHA to bring the protection of individuals based on source of income, sexual orientation, gender identity, and marital status within its compass.

LOCAL FAIR HOUSING STUDIES

In a recent audit of rental properties in the Dallas-Fort Worth area, the North Texas Fair Housing Center (NTFHC) measured the nature and extent of discrimination based on race and familial status in the North Texas region. The NTFHC discussed the findings of this study in a report published in 2011. According to the report, prospective African-American renters in the Dallas-Fort Worth metroplex can “expect to encounter discrimination in 37 percent of their housing searches”, while Hispanic renters will discriminate housing discrimination in 33 percent of housing searches, and families with children will face discrimination in 20 percent of housing searches. Although the study relied on limited sample sizes (particularly in testing

²³*The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination*. National Fair Housing Alliance 2011 Fair Housing Trends Report. 29 April 2011.

<http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=SbZH3pTEZhs%3d&tabid=3917&mid=5321>

²⁴ <http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=GBv0ZVJp6Gg%3d&tabid=3917&mid=5321>

²⁵ *Ibid.*

for discrimination against Hispanic applicants and those with children), the findings suggest that housing discrimination is a live issue in the Dallas-Fort Worth area.²⁶

C. FAIR HOUSING CASES

NATIONAL FAIR HOUSING CASES

As noted in the introduction to this report, provisions to affirmatively further fair housing are long-standing components of HUD's Housing and Community Development programs. In fact, in 1970, *Shannon v. HUD* challenged the development of a subsidized low-income housing project in an urban renewal area of Philadelphia that was racially and economically integrated. Under the Fair Housing Act, federal funding for housing must further integrate community development as part of furthering fair housing, but the plaintiffs in the *Shannon* case claimed that the development would create segregation and destroy the existing balance of the neighborhood. As a result of the case, HUD was required to develop a system to consider the racial and socio-economic impacts of their projects.²⁷ The specifics of the system were not decided upon by the court, but HUD was encouraged to consider the racial composition and income distribution of neighborhoods, racial effects of local regulations, and practices of local authorities.²⁸ The *Shannon* case gave entitlement jurisdictions the responsibility of considering the segregation effects of publicly-funded housing projects on their communities as they affirmatively further fair housing.

Much more recently, and in a landmark fraud case, Westchester County, New York, was ordered to pay more than \$50 million to resolve allegations of misusing federal funds for public housing projects and falsely claiming their certification of furthering fair housing. The lawsuit, which was filed in 2007 by an anti-discrimination center, alleged that the County failed to reduce racial segregation of public housing projects in larger cities within the County and to provide affordable housing options in its suburbs. The County had accepted more than \$50 million from HUD between 2000 and 2006 with promises of addressing these problems. In a summary judgment in February 2009, a judge ruled that the County did not properly factor in race as an impediment to fair housing and that the County did not accurately represent its efforts of integration in its AI. In the settlement, Westchester County was forced to pay more than \$30 million to the federal government, with roughly \$20 million eligible to return to the County to aid in public housing projects. The County was also ordered set aside \$20 million to build public housing units in suburbs and areas with mostly white populations²⁹, and to promote legislation that was before the Board of Legislators to ban discrimination based on source of income. The County Executive's efforts to promote this legislation were limited to sending five letters to various advocacy organizations that were already promoting the legislation in support of their work, and one letter to the Board of Legislators expressing support for the legislation. When the legislation failed to pass in 2009, it was taken up again in a similar form in 2010, whereupon the newly elected County Executive took no action to

²⁶ Rental Audit: Dallas-Fort Worth Metroplex. North Texas Fair Housing Center. April 2011. http://www.northtexasfairhousing.org/86bfb8ffc7_sites/www.northtexasfairhousing.org/files/2011_NTFHC_Rental_Audit_Report_FINAL.pdf

²⁷ U.S. HUD. *39 Steps Toward Fair Housing*. <http://www.hud.gov/offices/ftheo/39steps.pdf>

²⁸ Orfield, Myron. "Racial Integration and Community Revitalization: Applying the Fair Housing Act to the Low Income Housing Tax Credit." *Vanderbilt Law Review*, November 2005.

²⁹ <http://www.hud.gov/content/releases/settlement-westchester.pdf>

support the renewed legislation and vetoed the bill when it was eventually passed in weakened form. Finding that the County Executive had not fulfilled the terms of the settlement, HUD rejected the County's AFFH certification and withheld funding in 2011. As of April 2013, HUD's decision has been upheld through subsequent court challenges. The ramifications of this case are expected to affect housing policies of both states and entitlement communities across the nation; activities taken to affirmatively further fair housing will likely be held to higher levels of scrutiny to ensure that federal funds are being spent to promote fair housing and affirmatively further fair housing.

In 2008, \$3 billion of federal disaster aid was allotted to the Texas state government to provide relief from damage caused by hurricanes Ike and Dolly. These storms ravaged homes in coastal communities, many of which were owned by low-income families that could not afford to rebuild. However, instead of directing the federal funds to the areas most affected by the storms, the State spread funds across Texas and let local planning agencies spend at will. In reaction to this, two fair housing agencies in the state filed a complaint with HUD stating that the plan violated fair housing laws as well as federal aid requirements that specify half of the funds be directed to lower-income persons. In light of the complaint, HUD withheld \$1.7 billion in CDBG funds until the case was resolved. A settlement was reached in June 2010; the State was required to redirect 55 percent of the amount of the original funds to aid poorer families that lost their homes. The State was also asked to rebuild public housing units that were destroyed by the storms and to offer programs that aid minority and low-income residents in relocating to less storm-prone areas or areas with greater economic opportunities.³⁰

LOCAL FAIR HOUSING CASES

United States v. City of Dallas

In November of 2013, HUD sent a 29-page letter to the City of Dallas detailing the results of an investigation it had conducted on behalf of 1600 Pacific, a developer of low-income housing in the Dallas area. The developer had submitted plans to the city for the renovation of a vacant, 32-story building in the downtown area and the conversion of that building into a mixed-use, multi-family development. Following the renovation of the building, 40 percent of the units were slated to be reserved for low-income residents. In Dallas, low-income residents strongly tend to be black or Hispanic—the 1600 Pacific project, on the other hand, was proposed for an area in which 74 percent of the residents were non-minority, and in which incomes and housing costs tended to be relatively high. The complainant—1600 Pacific—in the case claimed that the city had enacted policies designed to derail their development and defeat the purpose of the requirements tied to the CDBG funding that the city received.³¹ One city representative maintained, according to the complainants, that “low-income housing is not part of the vision for Downtown Dallas³²”.

Accordingly, the complainants alleged that the city's policies had the intent and purpose of promoting the development of affordable units in the south of the city while discouraging its development in the northern part of the city. In the course of its investigation of the complaint,

³⁰ <http://www.relmanlaw.com/docs/FinalConciliationAgreementTexas.pdf>

³¹ HUD's Letter to the City of Dallas, November 2013. Available from <http://www.scribd.com/doc/188785617/HUD-Letter-of-Findings-of-Non-Compliance>

³² *United States v. City of Dallas*, 2.

HUD found that the representatives of the City of Dallas had treated 1600 Pacific differently from other developers in order to promote developments with fewer affordable units. This differential treatment included the denial of permits to the developer on the grounds that it was bankrupt in spite of the fact that permits were issued to other developers with similar financial problems. In addition, HUD found that the city had made a routine practice of granting waivers to developers in North Dallas that allowed for the development of projects with as little as 20 percent of units reserved for affordable housing, though the objective of CDBG Section 108 loan guarantees is to promote the development of projects that provide 51 percent of units as low-income and moderate-income housing.

The original complaint filed by the developers of 1600 Pacific has been dismissed, though the owners have appealed the decision.³³ In January of 2014, the US District Court for the Northern District of Texas denied the defendants claims against the city under the False Claims Act (FCA)—their claim was that the city had falsely certified that it was affirmatively furthering fair housing.³⁴ As of March 2014, HUD and the City of Dallas have yet to reach an agreement on how to address the city’s alleged non-compliance with the requirements of the CDBG program. At stake are millions of dollars in HUD funding, which the Department may withhold as a result of this alleged non-compliance. However, the case is likely to impact fair housing policy across the country, and touches on an active issue in national fair housing policy, which is the role that concentration of affordable housing plays in the perpetuation of housing discrimination.

Ojo v. Farmers Group, Inc.

In a case that highlights limitations in the scope of the FHA, the Supreme Court of Texas found that the inclusion of criteria for calculating insurance rates that produce a disparate impact on protected class individuals was not illegal in Texas, as long as the relevant criteria were not themselves based “wholly or partly” on race. While the FHA specifically bars intentional discrimination—and has been consistently interpreted to prohibit unintentional discrimination—the FHA was found to be reverse-preempted in this case under the McCarran-Ferguson Act. This Act asserts that a state law reverse-preempts federal statutes that do not specifically address insurance as long as the state law is designed to regulate insurance, and if the application of the federal statute to a case “might invalidate, impair, or supersede the state law.”

NuRock Development, Inc. v. City of Corinth

In a 2004 complaint against the City of Corinth, Texas, NuRock Development, Inc. accused the city of barring the development of affordable housing in Corinth in response to neighborhood opposition. According to NuRock, the city had initially been supportive of the project, but began to issue onerous, unnecessary, and cost-prohibitive requirements as a condition of approval for the project “after an orchestrated campaign by neighbors to block the development.” The complaint alleged that the city’s actions “had the purpose and effect of preventing African-Americans, Hispanics, and families with children who would have lived in

³³ “HUD: Dallas affordable-housing practices break civil rights law”. <http://www.dallasnews.com/news/metro/20131202-hud-dallas-affordable-housing-practices-break-civil-rights-laws.ece>

³⁴ *United States of American v. City of Dallas*, Memorandum Opinion and Order from January 2014. Available from http://www.gpo.gov/fdsys/pkg/USCOURTS-txnd-3_11-cv-00354/pdf/USCOURTS-txnd-3_11-cv-00354-1.pdf

Tower Ridge from obtaining housing in Corinth³⁵.” The two parties settled in 2005, and construction was allowed to proceed on the condition that NuRock make improvements to Tower Ridge road and place funds in escrow as collateral for those improvements. In 2006, the city sued NuRock for failing to place the required funds in escrow, and NuRock countersued on the grounds that the city was continuing to obstruct the project, in violation of the settlement agreement.³⁶

SUMMARY

A review of laws, studies, cases, and related materials relevant to fair housing in demonstrate some of the complexity of the fair housing landscape in Fort Worth. The recognition of protected class status at various levels determines the degree of protections Fort Worth residents enjoy, and to whom residents must address their complaints when they feel their fair housing rights have been violated. National studies demonstrate the persistence of discrimination in spite of these laws, and the study by the North Texas Fair Housing Center suggests that Fort Worth residents are still vulnerable to discrimination based on race and family size. Finally, the review of national and local cases relating to fair housing underscore the complex interplay between state and local fair housing law, the connection between affordable housing policy and fair housing policy, and the role of neighborhood opposition—NIMBYism—in perpetuating housing discrimination.

³⁵ *NuRock Development, Inc. v. City of Corinth*

³⁶ *City of Corinth v. NuRock Development, Inc.*

SECTION IV. REVIEW OF THE EXISTING FAIR HOUSING STRUCTURE

The purpose of this section is to provide a profile of fair housing resources in Fort Worth based on a number of factors, including an enumeration of key agencies and organizations that contribute to affirmatively furthering fair housing, evaluation of the presence and scope of services of existing fair housing organizations, and a review of the complaint process.

A. FAIR HOUSING AGENCIES

FEDERAL AGENCIES

U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) oversees, administers, and enforces the federal Fair Housing Act. HUD's regional office in Fort Worth oversees housing, community development, and fair housing enforcement in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas.³⁷ The Office of Fair Housing and Equal Opportunity (FHEO) within HUD's Fort Worth office enforces the Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending, and other related transactions in Texas. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with state and local agencies under the Fair Housing Assistance Program (FHAP) and Fair Housing Initiative Program (FHIP), as described below.

Fair Housing Assistance Program

In the U.S., many agencies receive funding directly from HUD as FHAP recipients, who requires an ordinance or law that empowers a state or local governmental agency to enforce the state or local fair housing law. If HUD determines that the local entity can operate on a "substantially equivalent" level to federal agency enforcement activities, HUD contracts with that agency to process fair housing complaints and reimburses the jurisdiction on a per case basis.³⁸ FHAP grants are awarded to public, not private, entities and are given on a noncompetitive, annual basis to substantially equivalent state and local fair housing enforcement agencies.

To create a substantially equivalent agency, a state or local jurisdiction must first enact a fair housing law that is substantially equivalent to federal law. In addition, the local jurisdiction must have both the administrative capacity and fiscal ability to carry out the law. With these elements in place, the jurisdiction may apply to HUD in Washington, D.C., for substantially equivalent status. The jurisdiction's law would then be examined, and the federal government would make a determination as to whether it is substantially equivalent to federal fair housing law.

³⁷ "Fair Housing Regional Offices."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/aboutfheo/fhhubs#hdwest2

³⁸ "Title VIII: Fair Housing and Equal Opportunity."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

When substantially equivalent status has been granted, complaints of housing discrimination are dually filed with the state or local agency and HUD, with the state or local agency investigating most complaints. When federally subsidized housing is involved, however, HUD will typically investigate the complaint. Regardless, the state or local agency is reimbursed for complaint intake and investigation and is awarded funds for fair housing training and education.

The Texas Workforce Commission is a substantially equivalent agency that partners with HUD to promote and enforce fair housing law at the state level under the auspices of the FHAP. The Fort Worth Human Relations Commission serves Fort Worth residents as a substantially equivalent partner of HUD.³⁹

Fair Housing Initiative Program

A FHIP participant may be a government agency, a private nonprofit, or a for-profit organization. FHIPs are funded through a competitive grant program that provides funds to organizations to carry out projects and activities designed to enforce and enhance compliance with fair housing law. Eligible activities include education and outreach to the public and the housing industry on fair housing rights and responsibilities as well as enforcement activities in response to fair housing complaints, such as testing and litigation.⁴⁰

The following FHIP initiatives, as defined on HUD's website, provide funds and competitive grants to eligible organizations:

The Fair Housing Organizations Initiative (FHOI) provides funding that builds the capacity and effectiveness of non-profit fair housing organizations by providing funds to handle fair housing enforcement and education initiatives more effectively. FHOI also strengthens the fair housing movement nationally by encouraging the creation and growth of organizations that focus on the rights and needs of underserved groups, particularly persons with disabilities.

[Eligible Grantees:] Applicants must be qualified fair housing enforcement organizations with at least two years of experience in complaint intake, complaint investigation, testing for fair housing violations, and meritorious claims in the three years prior to the filing of their application.

[Eligible Activities:] Grants may be used flexibly to support the basic operation and activities of new and existing non-profit fair housing organizations.⁴¹

The Private Enforcement Initiative (PEI) offers a range of assistance to the nationwide network of fair housing groups. This initiative funds non-profit fair housing organizations to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices.

³⁹ http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHAP/agencies

⁴⁰ "Fair Housing Initiatives Program (FHIP)."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHIP

⁴¹ *Ibid.*

[Eligible Grantees:] Fair housing enforcement organizations that meet certain requirements related to the length and quality of previous fair housing enforcement experience may apply for FHIP-PEI funding.

[Eligible Activities:] Funds such activities as conducting complaint-based and targeted testing and other investigations of housing discrimination, linking fair-housing organizations in regional enforcement activities, and establishing effective means of meeting legal expenses in support of fair housing litigation.⁴²

The Education and Outreach Initiative (EOI) offers a comprehensive range of support for fair housing activities, providing funding to State and local government agencies and non-profit organizations for initiatives that explain to the general public and housing providers what equal opportunity in housing means and what housing providers need to do to comply with the Fair Housing Act.

[Eligible Grantees:] State or local governments, qualified fair housing enforcement organizations (those with at least 2 years of experience), other fair housing organizations, and other public or private nonprofit organizations representing groups of persons protected by the Fair Housing Act may apply for FHIP-EOI funding.

[Eligible Activities:] Funds a broad range of educational activities that can be national, regional, local, or community-based in scope. Activities may include developing education materials, analyzing local impediments to housing choice, providing housing counseling and classes, convening meetings that bring together the housing industry with fair housing groups, developing technical materials on accessibility, and mounting public information campaigns. National projects that demonstrate cooperation with the real estate industry or focus on resolving the community tensions that arise as people expand their housing choices may be eligible to receive preference points.⁴³

The Administrative Enforcement Initiative (AEI) helps State and local governments who administer laws that include rights and remedies similar to those in the Fair Housing Act implement specialized projects that broaden an agency's range of enforcement and compliance activities. No funds are available currently for this program.⁴⁴

There were no HUD FHIP grant recipients headquartered in Fort Worth in 2012; however, fair housing resources are available to Fort Worth residents through the North Texas Fair Housing Center (FHC), a FHIP grantee that serves in Tarrant County along with eleven other counties in north Texas. The North Texas FHS was founded in 2010.⁴⁵

In 2012, HUD awarded \$261,589 in Continuing Development funds to the FHC⁴⁶. These funds, a sub-component of FHOI funding, are intended to “[support] fair housing organizations in building their capacity to enforce or investigate violations under the Fair Housing Act⁴⁷”. The 2012 award was a substantial increase over 2011, when the organization received \$108,805 in Continuing Development⁴⁸ grant money.

⁴² “Fair Housing Initiatives Program (FHIP).”

⁴³ *Ibid.*

⁴⁴ *Ibid.*

⁴⁵ http://www.northtexasfairhousing.org/86bfb8ffc7_sites/www.northtexasfairhousing.org/files/2011_NTFHC_Rental_Audit_Report_FINAL.pdf

⁴⁶ <http://www.gpo.gov/fdsys/pkg/FR-2012-07-13/pdf/2012-17131.pdf>

⁴⁷ “Notice of Funding Availability (NOFA) for HUD’s Fiscal Year 2013”.

http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail/nofa13/fhoi-cdc

⁴⁸ <http://www.gpo.gov/fdsys/pkg/FR-2012-02-08/pdf/2012-2875.pdf>

STATE AGENCIES

The Texas Workforce Commission

The Civil Rights Division of the Texas Workforce Commission (TWC) is charged with the enforcement of fair housing and equal opportunity employment laws in Texas as a substantially equivalent agency of HUD. However, this agency does not serve residents of Fort Worth, presumably because the latter is served by the Fort Worth Human Relations Commission, also a substantially equivalent agency and FHAP grantee⁴⁹.

LOCAL AGENCIES AND ORGANIZATIONS

City of Fort Worth Human Relations Commission

The City of Fort Worth Human Relations Commission (FWHRC) is the agency authorized by city code to enforce provisions that prohibit discrimination in housing, employment, and other areas. The duties of the FWHRC include the following:

- “Advising and consulting with the City Council and the City Manager on matters involving racial, religious or ethnic discrimination.
- Recommending to the City Council and the City Manager measures designed to eliminate prejudice and discrimination.
- Promoting and encouraging communications between and cooperation of all groups interested in bettering community relations⁵⁰.”

The FWHRC partners and coordinates with a diverse and comprehensive array of advocacy groups that serve individuals with protected class status in Fort Worth⁵¹.

North Texas Fair Housing Center

The North Texas Fair Housing Center (FHC), in operation since 2010, promotes fair housing through investigation of housing complaints, education and outreach, and fair housing testing⁵². A non-profit organization and HUD FHIP grant recipient, the FHC promotes fair housing through housing counseling, housing discrimination complaint investigation, and education and outreach. It also promotes enforcement of fair housing law through coordination with local attorneys, and governmental agencies at the local, state, and federal level. Through fair housing testing, the organization has shed light on cases of housing discrimination across northern Texas, including the Fort Worth area⁵³.

⁴⁹ In judging an application for FHAP funding, HUD takes into consideration whether or not a jurisdiction is already served by an agency with substantially equivalent status. http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHAP

⁵⁰ “Human Relations Resource Guide”. http://fortworthtexas.gov/uploadedFiles/City_Secretary/Boards_and_Commissions/Commissions/HRC%20ResourceGuide2010.pdf

⁵¹ *Ibid.*

⁵² http://www.northtexasfairhousing.org/86bfb8ffc7_sites/www.northtexasfairhousing.org/files/DMN.pdf

⁵³ Hall, Vincent. “Mi Casa Ain’t Su Casa.” *The Dallas Weekly*. 5 May 2011: 04. *NorthTexasFairHousingCenter.org*. Accessed 18 Nov. 2013.

B. COMPLAINT PROCESS REVIEW

COMPLAINT PROCESSES FOR FAIR HOUSING AGENCIES

U.S. Department of Housing and Urban Development

According to HUD's website, any person who feels that his or her housing rights have been violated may submit a complaint to HUD via phone, mail, or the internet. A complaint can be submitted to the national HUD office at:

Office of Fair Housing and Equal Opportunity
 Department of Housing and Urban Development
 451 Seventh Street SW, Room 5204
 Washington, DC 20410-2000
 Telephone: (202) 708-1112
 Toll Free: (800) 669-9777
<http://www.HUD.gov/offices/fheo/online-complaint.cfm>

The contact information for the regional HUD office in Fort Worth is:

Fort Worth Regional Office of FHEO
 U.S. Department of Housing and Urban Development
 801 Cherry Street, Unit #45
 Suite 2500
 Fort Worth, Texas 76102
 (817) 978-5900
 (800) 669-9777
 TTY (817) 978-5595
<http://www.HUD.gov>

When a complaint is submitted, intake specialists review the information and contact the complainant in order to gather additional details and determine if the case qualifies as possible housing discrimination. Complaints specific to a state or locality that is part of HUD's FHAP organizations are referred to the appropriate parties, who have 30 days to address the complaint. If HUD is handling the case, the formal complaint is sent to the complainant for review and then sent to the alleged violator for review and response.

Next, the circumstances of the complaint are investigated through interviews and examination of relevant documents. During this time, the investigator attempts to rectify the situation through conciliation, if possible. The case is closed if conciliation of the two parties is achieved or if the investigator determines that there was no reasonable cause of discrimination. If reasonable cause is found, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.⁵⁴ A respondent may be ordered to:

- Compensate for actual damages, including humiliation, pain, and suffering;
- Provide injunctive or other equitable relief to make the housing available;

⁵⁴ "HUD's Title VIII Fair Housing Complaint Process." <http://www.hud.gov/offices/fheo/complaint-process.cfm>

- Pay the federal government a civil penalty to vindicate the public interest, with a maximum penalty of \$10,000 for a first violation and \$50,000 for an additional violation within seven years; and/or
- Pay reasonable attorneys' fees and costs.⁵⁵

Texas Workforce Commission, Civil Rights Division

The TWC processes complaints for those unlawfully discriminated against in the sale, rental, or financing of housing. As presented on the Commission website, the complaint process for those who feel they have been victims of discrimination is as follows⁵⁶:

- The TWC will first determine whether or not it has the jurisdiction to handle the complaint.
- If it does, it will help the person who contacted the TWC to complete the complaint.
- Once the complaint is completed and signed by the complainant, the TWC will inform the complainant of the investigation and conciliation process, and invite him or her to present the TWC with an offer that he or she believes will resolve the complaint as part of the conciliation process. They will also notify the person against whom the complaint has been made of the investigation, explain the process, and provide him or her with the opportunity to make an offer that he or she believes will address the complaint. The TWC will then investigate the merits of the claim.
- If a complaint has merit, as determined during the investigation, and the parties have failed to reconcile, the TWC will notify both parties and may refer the complaint to the Texas Attorney General, who may in turn file suit.
- If the TWC finds no reasonable cause to pursue the complaint, it will notify both parties. In such a case, the complainant would retain the right to file suit in Federal or State District Court at his or her own expense.

As discussed above, Fort Worth residents may not file fair housing complaints with the TWC, but are encouraged to contact the Fort Worth Human Relations Commission.

Fort Worth Human Relations Commission

The Fort Worth Human Rights Commission (HRC) does not include a discussion of its complaint process on its webpages but may be contacted at the following address.

Fort Worth Human Relations Commission
 818 Missouri Avenue
 Fort Worth, Texas 76104
 (817) 392-7525
 (817) 392-7529 (Fax)

⁵⁵ "Fair Housing—It's Your Right." <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>

⁵⁶ <http://www.twc.state.tx.us/crd/housing-discrimination.html#complaintProcess>

North Texas Fair Housing Center

The North Texas Fair Housing Center accepts complaints from residents of Tarrant County, along with eleven other counties in north Texas⁵⁷. The FHC website does not include a description of the investigation process it undertakes upon receiving a fair housing complaint; however, residents of the twelve counties it serves are encouraged to contact the FHC by telephone or email, to visit the office between the hours of 9:00 AM and 5:00 PM, or submit a complaint through the “Ask a Question” or “File a Complaint” links on the organization’s home page at <http://www.northtexasfairhousing.org/index.php>. The contact information for the North Texas FHC is as follows⁵⁸:

North Texas Fair Housing Center
 8625 King George Dr
 Suite 130
 Dallas, Texas 75235
 (469) 941-0375
 (800) 471-1022
info@northtexasfairhousing.org

SUMMARY

A review of the fair housing profile in Fort Worth revealed that a mix of public and private organizations provide fair housing services on the federal, regional, and local levels. These organizations include HUD, the North Texas Fair Housing Center, and the City of Fort Worth Human Relations Commission. At the state level, fair housing resources are overseen and provided by the Texas Workforce Commission; however, residents of the city of Fort Worth do not come under the jurisdiction of the Commission and therefore must submit any fair housing complaints to the City of Fort Worth Human Relations Commission.

⁵⁷ For a complete list of these counties, visit <http://www.northtexasfairhousing.org/housing-discrimination-complaints.html>.

⁵⁸ *Ibid.*

SECTION V. FAIR HOUSING IN THE PRIVATE SECTOR

As part of the AI process, the U.S. Department of Housing and Urban Development (HUD) suggests that the analysis focus on possible housing discrimination in both the private and public sectors. Examination of housing factors in Fort Worth's public sector is presented in **Section VI**. The following section focuses on the results of research regarding the City's private sector, including the mortgage lending market, the real estate market, the rental market, and other private sector housing industries.

A. LENDING ANALYSIS

HOME MORTGAGE DISCLOSURE ACT

Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. A brief description of selected federal laws aimed at promoting fair lending follows:

- The 1968 *Fair Housing Act* prohibits discrimination in housing based on race, color, religion, and national origin. Later amendments added sex, familial status, and disability. Under the Fair Housing Act, it is illegal to discriminate against any of the protected classes in the following types of residential real estate transactions: making loans to buy, build, or repair a dwelling; selling, brokering, or appraising residential real estate; and selling or renting a dwelling.
- The *Equal Credit Opportunity Act* was passed in 1974 and prohibits discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance, and the exercise of any right under the Consumer Credit Protection Act.
- The *Community Reinvestment Act* was enacted in 1977 and requires each federal financial supervisory agency to encourage financial institutions in order to help meet the credit needs of the entire community, including low- and moderate-income neighborhoods.
- Under the *Home Mortgage Disclosure Act (HMDA)*, enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex, ethnicity, and household income of mortgage applicants by the Census tract in which the loan is proposed as well as outcome of the loan application.⁵⁹ The analysis presented herein is from the HMDA data system.

⁵⁹ *Closing the Gap: A Guide to Equal Opportunity Lending*, The Federal Reserve Bank of Boston, April 1993. <http://www.bos.frb.org/commdev/closing-the-gap/closingt.pdf>

The HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans.⁶⁰ Both types of lending institutions must meet the following set of reporting criteria:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;⁶¹
3. The institution must have had an office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to the Federal National Mortgage Association (FNMA or Fannie Mae) or the Federal Home Loan Mortgage Corporation (FHLMC or Freddie Mac). These agencies purchase mortgages from lenders and repackage them as securities for investors, making more funds available for lenders to make new loans.

For other institutions, including non-depository institutions, additional reporting criteria are as follows:

1. The institution must be a for-profit organization;
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million;
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing mortgages on property located in an MSA in the preceding calendar year; and
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information available regarding home purchase originations, home remodel loan originations, and refinancing. The Federal Financial Institutions Examination Council (FFIEC) makes HMDA data available on its website. While HMDA data are available for more years than are presented in the following pages, modifications were made in 2004 for documenting loan applicants' race and ethnicity, so data are most easily compared after that point.

Home Purchase Loans

As presented on the following page in Table V.1, HMDA information was collected for tracts in the City of Fort Worth from 2004 through 2011. During this time, 462,010 loan applications were reported by participating institutions for home purchases, home improvements, and refinancing mortgages. Of these loan applications, 266,417 were specifically for home purchases.

⁶⁰ Data are considered "raw" because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made significant changes in reporting, particularly regarding ethnicity data, loan interest rates, and the multi-family loan applications.

⁶¹ Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

Table V.1
Purpose of Loan Applications by Year

City of Fort Worth
2004–2011 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	37,166	47,787	53,552	41,482	26,904	22,460	19,294	17,772	266,417
Home Improvement	4,162	5,287	5,108	5,641	4,390	2,308	1,588	1,543	30,027
Refinancing	31,792	26,987	19,818	18,999	14,215	20,812	16,406	16,537	165,566
Total	73,120	80,061	78,478	66,122	45,509	45,580	37,288	35,852	462,010

Within this set of data, it is important to evaluate only the owner-occupied home purchase transactions. Home purchases and access to homeownership are the focus of this particular analysis because other categories typically apply to units already purchased and do not reflect the ability of an individual to choose an owner-occupied home. As shown in Table V.2, below, of the 266,417 home purchase loan applications submitted during the time period, 234,478 were specifically for owner-occupied homes. The number of owner-occupied home purchase loan applications was highest in 2006, with 44,195 applications that year.

Table V.2
Occupancy Status for Home Purchase Loan Applications

City of Fort Worth
2004–2011 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	Total
Owner-Occupied	33,368	40,603	44,195	36,389	24,432	21,116	18,090	16,285	234,478
Not Owner-Occupied	3,644	6,963	9,229	5,021	2,426	1,283	1,150	1,390	31,106
Not Applicable	154	221	128	72	46	61	54	97	833
Total	37,166	47,787	53,552	41,482	26,904	22,460	19,294	17,772	266,417

Denial Rates

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- “Originated,” which indicates that the loan was made by the lending institution;
- “Approved but not accepted,” which notes loans approved by the lender but not accepted by the applicant;
- “Application denied by financial institution,” which defines a situation wherein the loan application failed;
- “Application withdrawn by applicant,” which means that the applicant closed the application process;
- “File closed for incompleteness” which indicates the loan application process was closed by the institution due to incomplete information; or
- “Loan purchased by the institution,” which means that the previously originated loan was purchased on the secondary market.

These outcomes were used to determine denial rates presented in the following section. Factors in denial of home purchase loans, such as credit scores or down payment amounts, are not reported, so many of the reasons for loan denials are unknown.

Only loan originations and loan denials were inspected as an indicator of the underlying success or failure of home purchase loan applicants. Altogether, there were 105,314 loan originations and 23,055 applications denied for an average eight-year denial rate of 18 percent,

as shown below in Table V.3. Rough comparison can be made to national figures; in the U.S. in 2010 the denial rate for all home purchase loans, including those not for owner occupancy, was 21.1 percent.

**Table V.3
Loan Applications by Action Taken**

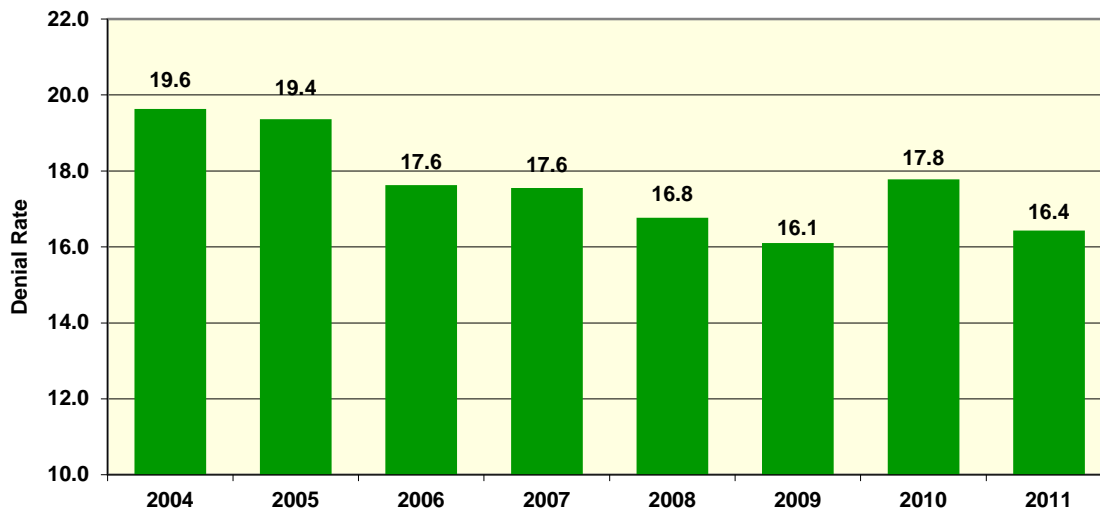
City of Fort Worth
2004–2011 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	Total
Loan Originated	15,535	19,013	20,321	16,065	10,889	8,654	7,823	7,014	105,314
Application Approved but not Accepted	1,769	2,098	2,429	2,010	885	473	471	413	10,548
Application Denied	3,795	4,565	4,349	3,420	2,194	1,661	1,692	1,379	23,055
Application Withdrawn by Applicant	2,490	3,082	3,483	2,225	1,705	1,257	1,103	1,083	16,428
File Closed for Incompleteness	676	589	604	555	360	169	147	169	3,269
Loan Purchased by the Institution	9,103	11,141	12,924	12,114	8,338	8,820	6,852	6,227	75,519
Preapproval Request Denied	0	80	55	0	38	61	2	0	236
Preapproval Approved but not Accepted	0	35	30	0	23	21	0	0	109
Total	33,368	40,603	44,195	36,389	24,432	21,116	18,090	16,285	234,478
Denial Rate	19.6%	19.4%	17.6%	17.6%	16.8%	16.1%	17.8%	16.4%	18.0%

As shown in Diagram V.1, owner-occupied home purchase denial rates were highest in 2004 and declined steadily after that year, falling to 16.1 percent in 2009. Rates rose again to 17.8 percent in 2010 before falling back to 16.4 in 2011. This downward trend may be due to a number of economic and industry factors.

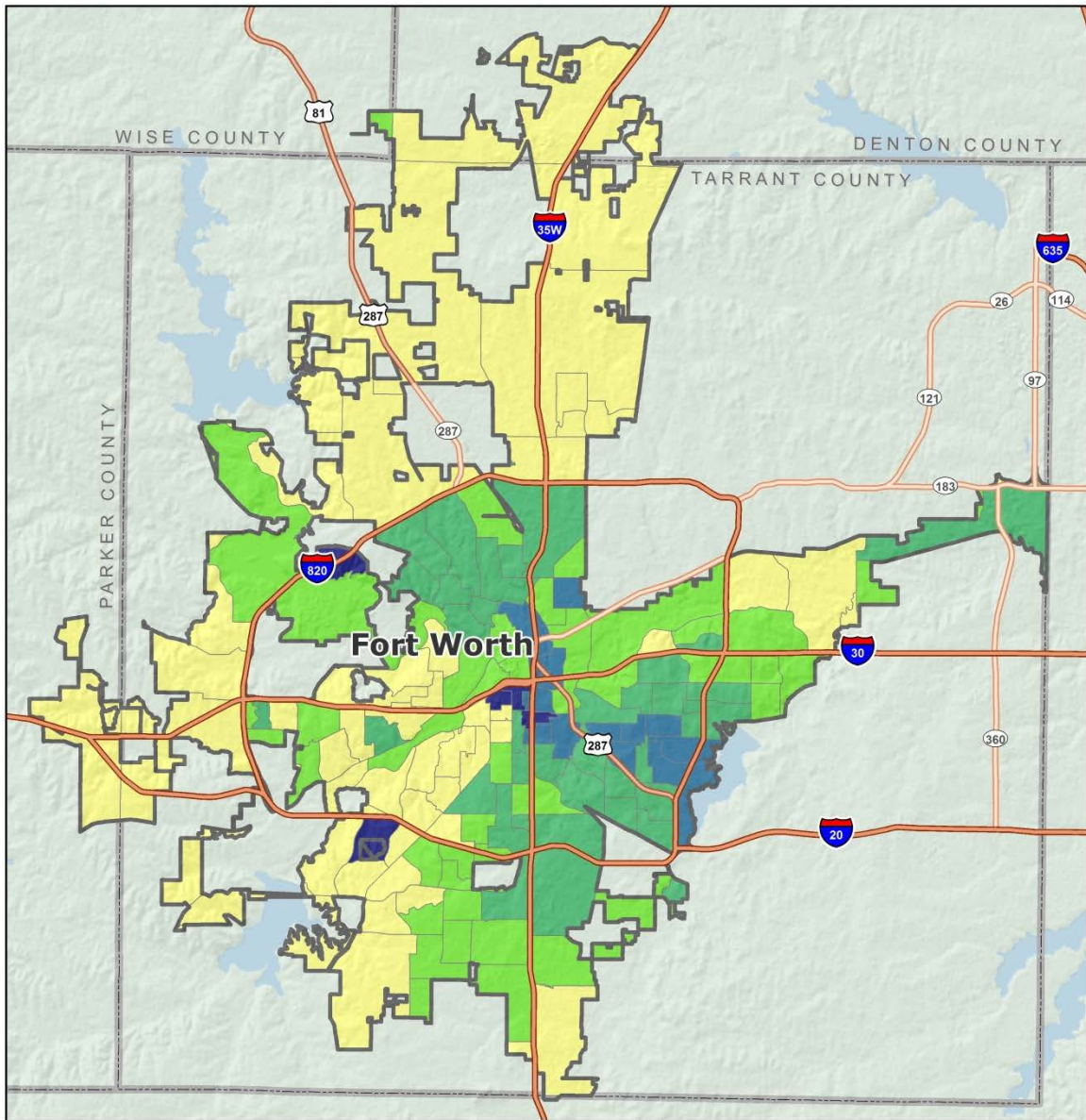
**Diagram V.1
Denial Rates by Year**

City of Fort Worth
2004–2011 HMDA Data



While the citywide average denial rate was relatively low, rates were not evenly distributed in the city. As shown in Map V.1, on the following page, several Census tracts had average denial rates above the Fort Worth average of 18 percent and above the disproportionate share threshold of 28 percent. For example, one tract in Lake Worth, another near Hulen, and several tracts near the interchange of I-35W and I-30 all had denial rates over 54 percent. In general, a high percentage of denied loans were originated in the area inside the beltway, particularly in the southeast of Fort Worth.

Map V.1
Denial Rates by Census Tract
 City of Fort Worth
 2004–2011 HMDA Data



LEGEND

2004-2011 Loan Denial Rates
 2004-2011 Average Loan Denial Rate in Fort Worth = 18.0%
 Disproportionate Share Threshold = 28.0%

Denial Rate

7.0% - 18.0%	Disproportionate Share Threshold
18.1% - 28.0%	
28.1% - 42.8%	
42.9% - 54.7%	
54.8% - 66.7%	

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: FFIEC HMDA, 2004-2011

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

0 3 Miles

HMDA data were also used to determine denial rates by gender. Table V.4 (below) shows that denial rates were uneven between genders, with females experiencing higher denial rates than males every year from 2004 through 2011. During this time, male applicants experienced an

average denial rate of 16.4 percent per year, while female applicants experienced an average denial rate of 19.9 percent per year. The difference between males and females in the rate of loan denials ranged from 2.4 in 2006 to 4.7 percent in 2007 and 2011; on average, the difference was 3.5 percent over this time period. This pattern on its own does not indicate the existence of an impediment to fair housing choice; however, it does suggest the possible presence of discriminatory lending practices, which can constitute barriers to fair housing choice.

Table V.4
Denial Rates by Gender of Applicant

City of Fort Worth
2004–2011 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	17.9%	22.0%	27.2%	66.7%	19.6%
2005	17.9%	20.9%	29.2%	5.0%	19.4%
2006	16.2%	18.6%	28.2%	20.0%	17.6%
2007	15.7%	20.4%	24.3%	.0%	17.6%
2008	15.5%	19.1%	20.0%	23.5%	16.8%
2009	14.9%	17.3%	23.6%	25.0%	16.1%
2010	16.5%	19.7%	22.2%	25.0%	17.8%
2011	14.5%	19.2%	25.0%	100.0%	16.4%
Average	16.4%	19.9%	25.7%	22.2%	18.0%

Denial rates were also calculated by race and ethnicity of loan applicants, presented on the following page in Table V.5. As shown, minority race and ethnicity applicants experienced higher denial rates than white applicants. Black applicants had the highest denial rate during this time period at 29.9 percent—more than double the average rate of denials experienced by white applicants—followed by American Indian applicants at 26.1 percent. Hispanic applicants were denied loans at a considerably higher rate (23.1 percent) than non-Hispanic applicants (15.7 percent). By contrast, the denial rate for Asian applicants was only slightly higher than the city average, and the denial rate for white applicants was uniformly below the overall denial rate in Fort Worth. While these data on their own do not imply that impediments to fair housing exist, the higher rates of denial among minority applicants could be caused by discrimination against residents in some areas.

Table V.5
Denial Rates by Race/Ethnicity of Applicant

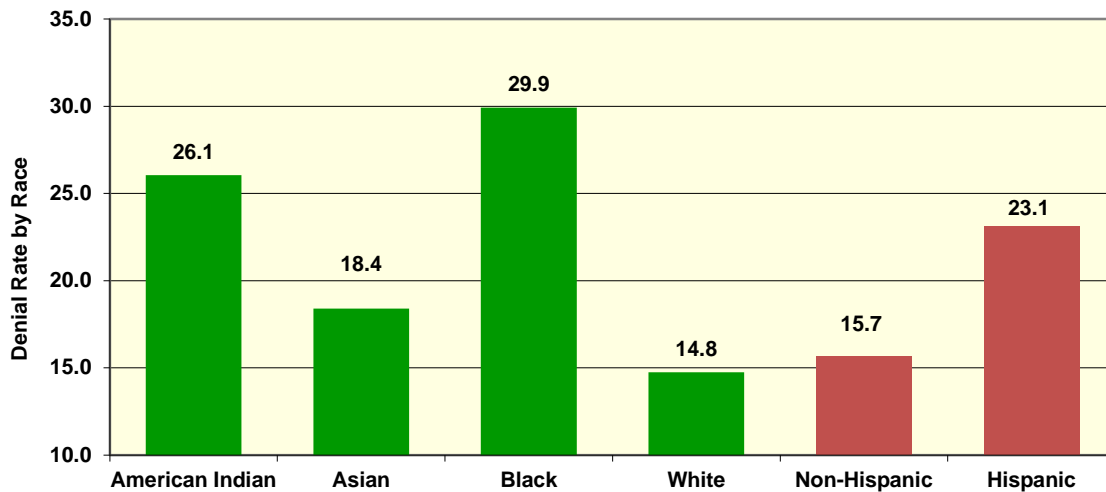
City of Fort Worth
2004–2011 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	28.7%	25.9%	24.7%	26.2%	27.8%	25.4%	21.1%	27.1%	26.1%
Asian	14.4%	17.9%	17.2%	17.9%	21.6%	22.8%	21.8%	18.1%	18.4%
Black	29.0%	31.9%	28.7%	31.7%	30.7%	31.9%	25.4%	25.6%	29.9%
White	16.5%	15.8%	14.1%	14.2%	14.2%	12.9%	15.7%	13.8%	14.8%
Not Available	26.8%	26.1%	24.5%	24.5%	21.5%	23.3%	25.2%	26.7%	25.1%
Not Applicable	17.3%	3.6%	20.0%	.0%	20.0%	050.0%	0.0%	100.0%	16.0%
Average	19.6%	19.4%	17.6%	17.6%	16.8%	16.1%	17.8%	16.4%	18.0%
Non-Hispanic	18.1%	17.2%	15.3%	15.4%	14.4%	13.7%	15.2%	13.5%	15.7%
Hispanic	23.1%	23.3%	22.4%	22.3%	24.7%	23.0%	24.8%	22.5%	23.1%

Diagram V.2, on the following page, shows overall denial rates by race and ethnicity from 2004 through 2011.

Diagram V.2
Denial Rates by Race

City of Fort Worth
2004–2011 HMDA Data



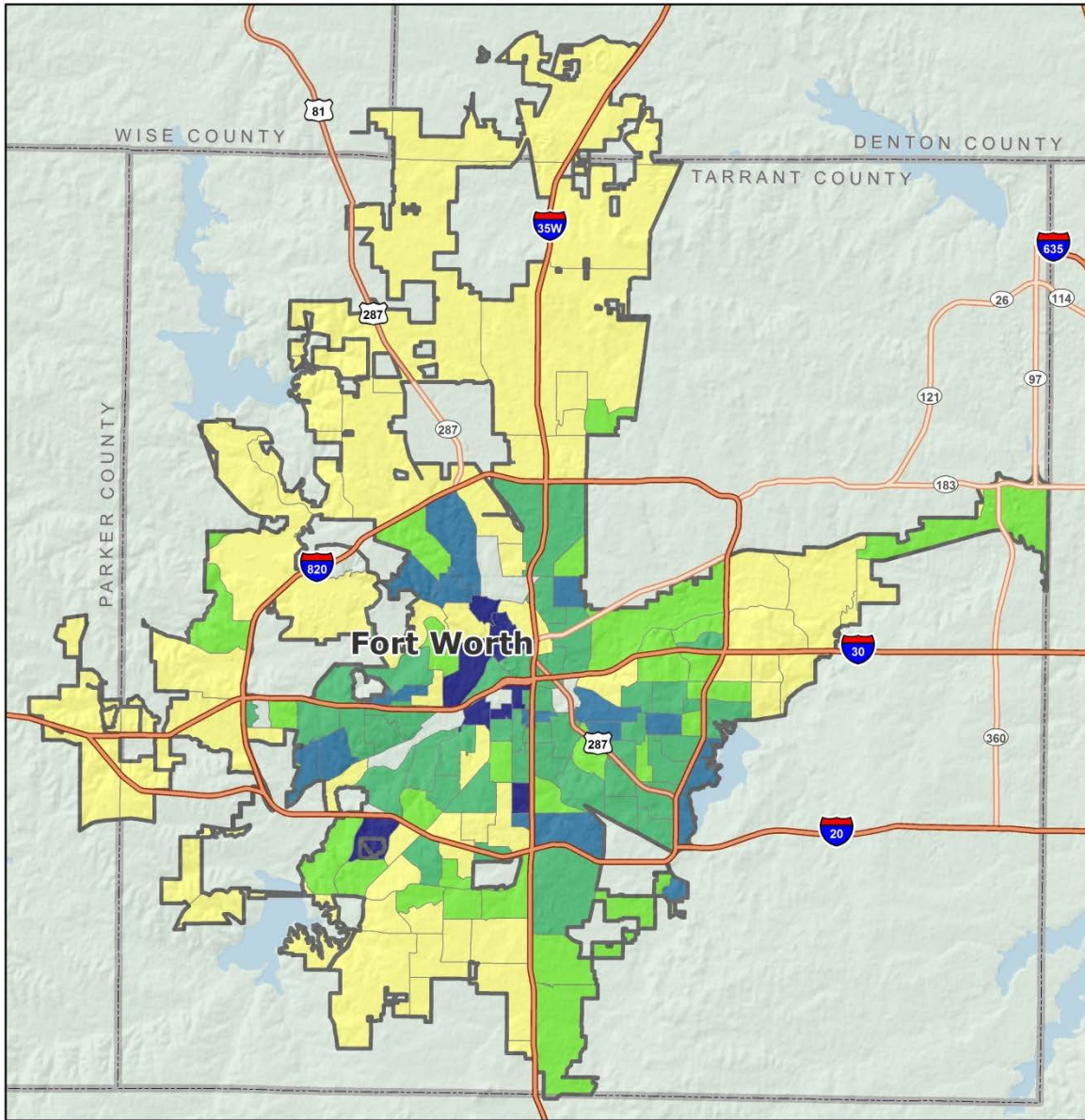
Denial rates by race and ethnicity were plotted on several maps to examine the geographic concentration of loan denials, beginning on page 90. Disproportionate and very high denial rates to minority groups in certain tracts may imply impediments to fair housing choice; reviewing these rates on geographic maps can indicate areas where these problems are most prevalent.

Data regarding the concentration of denial rates for black applicants in Fort Worth are presented on the following page in Map V.2. In many tracts, denial rates for black applicants were above the disproportionate share threshold of 39.9 percent; in some places, it was as high as 100 percent. Tracts with the highest concentrations of denials to black applicants, in which denial rates were at least 80.1 percent, were located to the west of I-35W, and most of them were concentrated near the interchange of I-35W and I-30. Additionally, denial rates were over 80 percent in the area around Hulen and the area to the north of La Gran Plaza mall.

Map V.3, shows home loan application denial rates for Hispanic applicants, who experienced an average denial rate of 23.1 percent. The disproportionate share threshold for denials to Hispanic applicants was 33.1 percent, though in some areas the rate of denials was as high as 100 percent. The two tracts with the highest rates of loan denials were one near Lake Mary and another near the interchange of I-30 and I-35W. As was the case with loan denials in general, tracts with disproportionately high rates of loan denials to Hispanic applicants were largely concentrated inside the beltway.

Map V.4, presents geographic data on denial rates for Asian applicants in the city. Several tracts had shares above the disproportionate share threshold of 28.4 percent. Tracts with high rates of loan denials to Asian applicants were concentrated in the southeast, with a few additional tracts around the interchange of I-30 and I-35W and one tract in Como. In some of these areas, the denial rate for Asian applicants was as high as 100 percent. Data regarding denial rates for white applicants are presented in Map V.5. As shown, several Census tracts in the area had denial rates in excess of the disproportionate share threshold of 24.8 percent. Denial rates for white applicants tended to be lowest in peripheral census tracts and in the southwest, while a large proportion of areas to the northwest, including Lake Mary, and southeast inside the beltway had disproportionately high rates.

Map V.2
Denial Rates for Black Applicants by Census Tract
 City of Fort Worth
 2004–2011 HMDA Data



LEGEND

2004-2011 Loan Denial Rates for Black Applicants
 2004-2011 Average Loan Denial Rate for Black Applicants in Fort Worth = 29.9%
 Disproportionate Share Threshold = 39.9%

Denial Rate	Color
0.0% - 29.9%	Light Yellow
30.0% - 39.9%	Light Green
40.0% - 60.0%	Medium Green
60.1% - 80.0%	Dark Green
80.1% - 100%	Dark Blue

Disproportionate Share Threshold

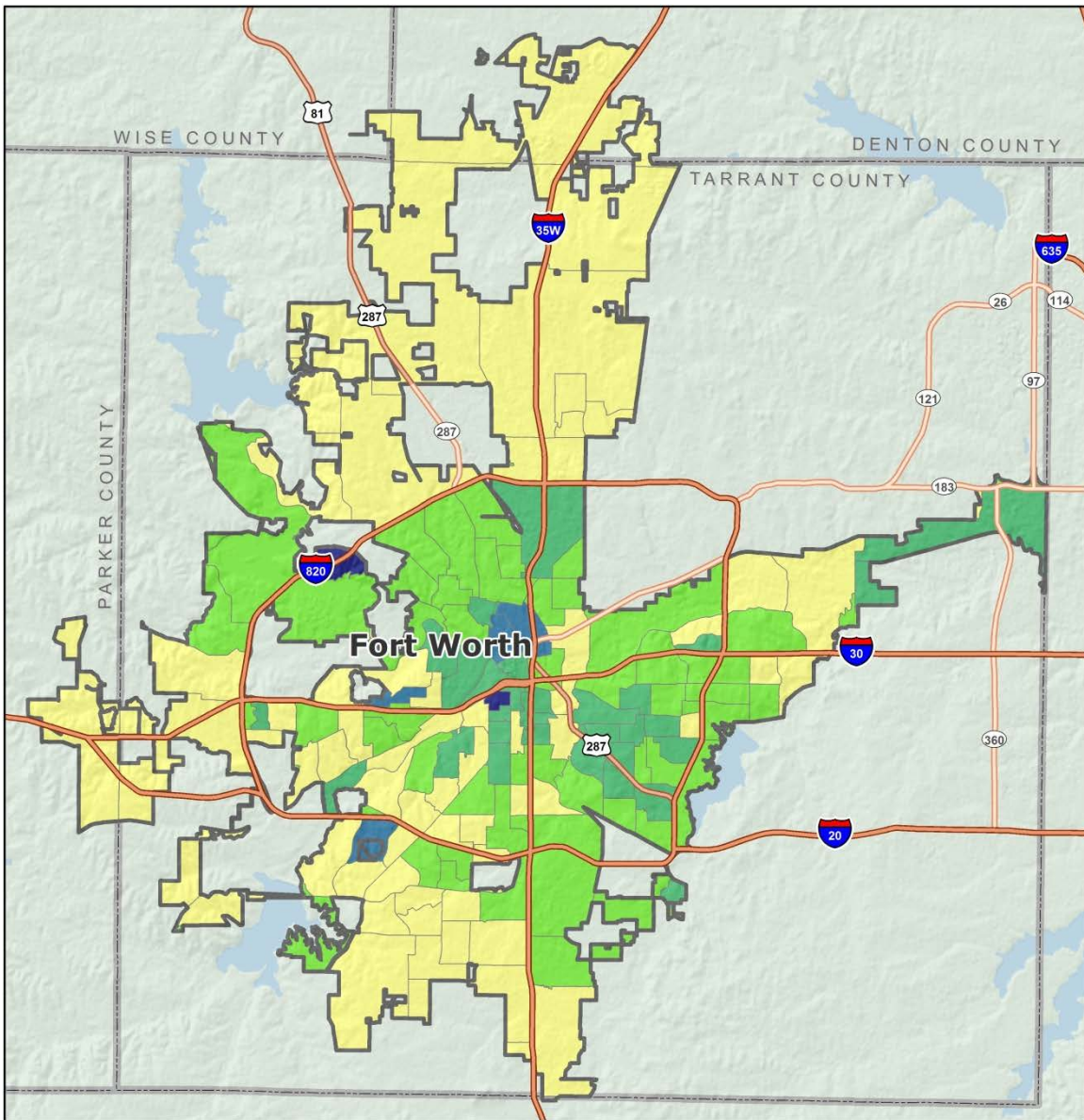
- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: FFIEC HMDA, 2004-2011

0 3 Miles

Map V.3
Denial Rates for Hispanic Applicants by Census Tract
 City of Fort Worth
 2004–2011 HMDA Data



LEGEND

2004-2011 Loan Denial Rates for Hispanic Applicants
 2004-2011 Average Loan Denial Rate for Hispanic Applicants in Fort Worth = 23.1%
 Disproportionate Share Threshold = 33.1%

Denial Rate	Color
0.0% - 23.1%	Lightest Yellow
23.2% - 33.1%	Light Green
33.2% - 50.0%	Medium Green
50.1% - 75.0%	Dark Green
75.1% - 100%	Darkest Green

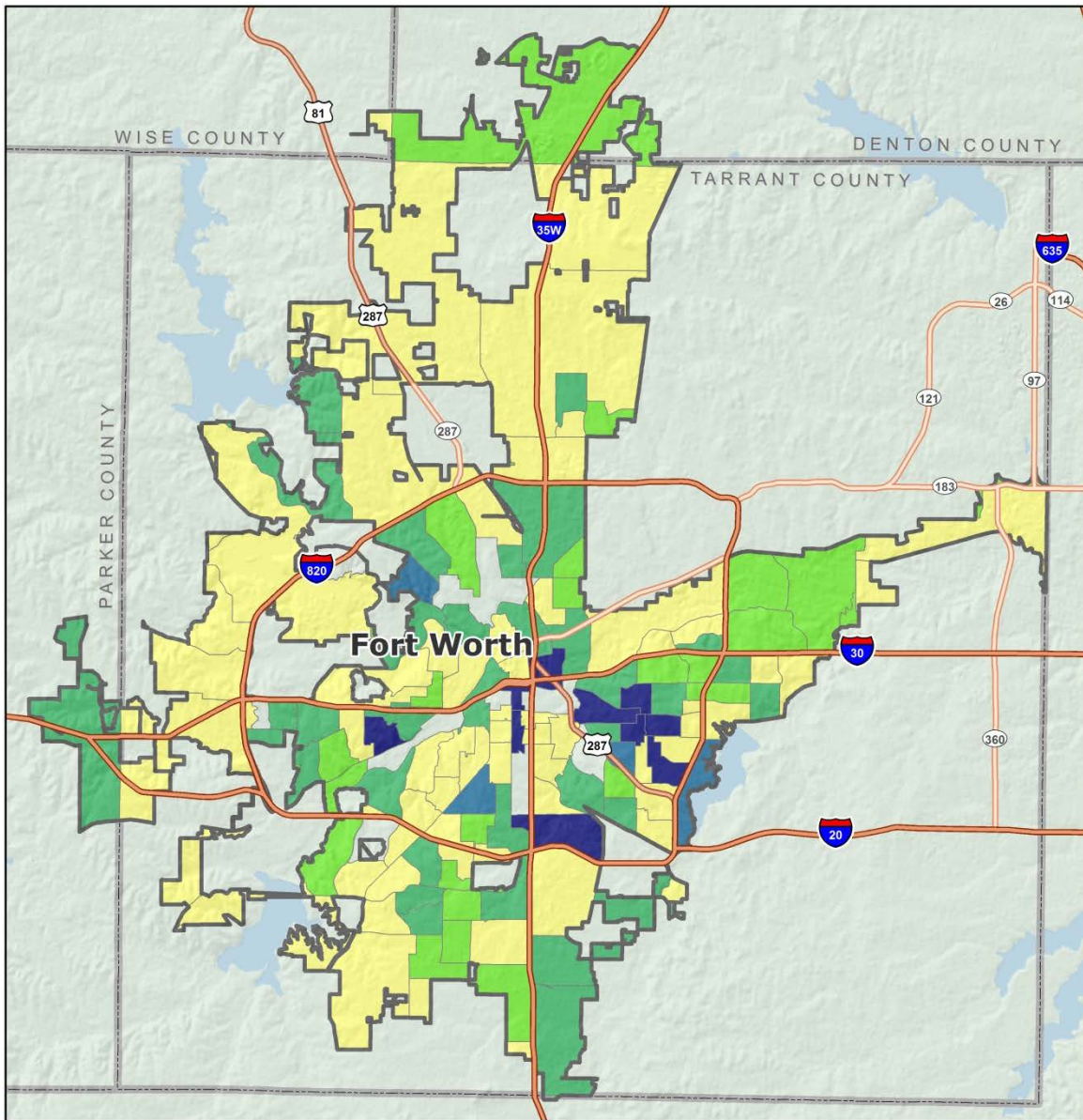
NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.
 Data Source: FFIEC HMDA, 2004-2011

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Disproportionate Share Threshold

0 3 Miles

Map V.4
Denial Rates for Asian Applicants by Census Tract
 City of Fort Worth
 2004–2011 HMDA Data



LEGEND

2004-2011 Loan Denial Rates for Asian Applicants
 2004-2011 Average Loan Denial Rate for Asian Applicants in Fort Worth = 18.4%
 Disproportionate Share Threshold = 28.4%

Denial Rate	Color
0.0% - 18.4%	Lightest Yellow
18.5% - 28.4%	Yellow-Green
28.5% - 52.3%	Green
52.4% - 76.2%	Dark Green
76.2% - 100%	Darkest Green

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

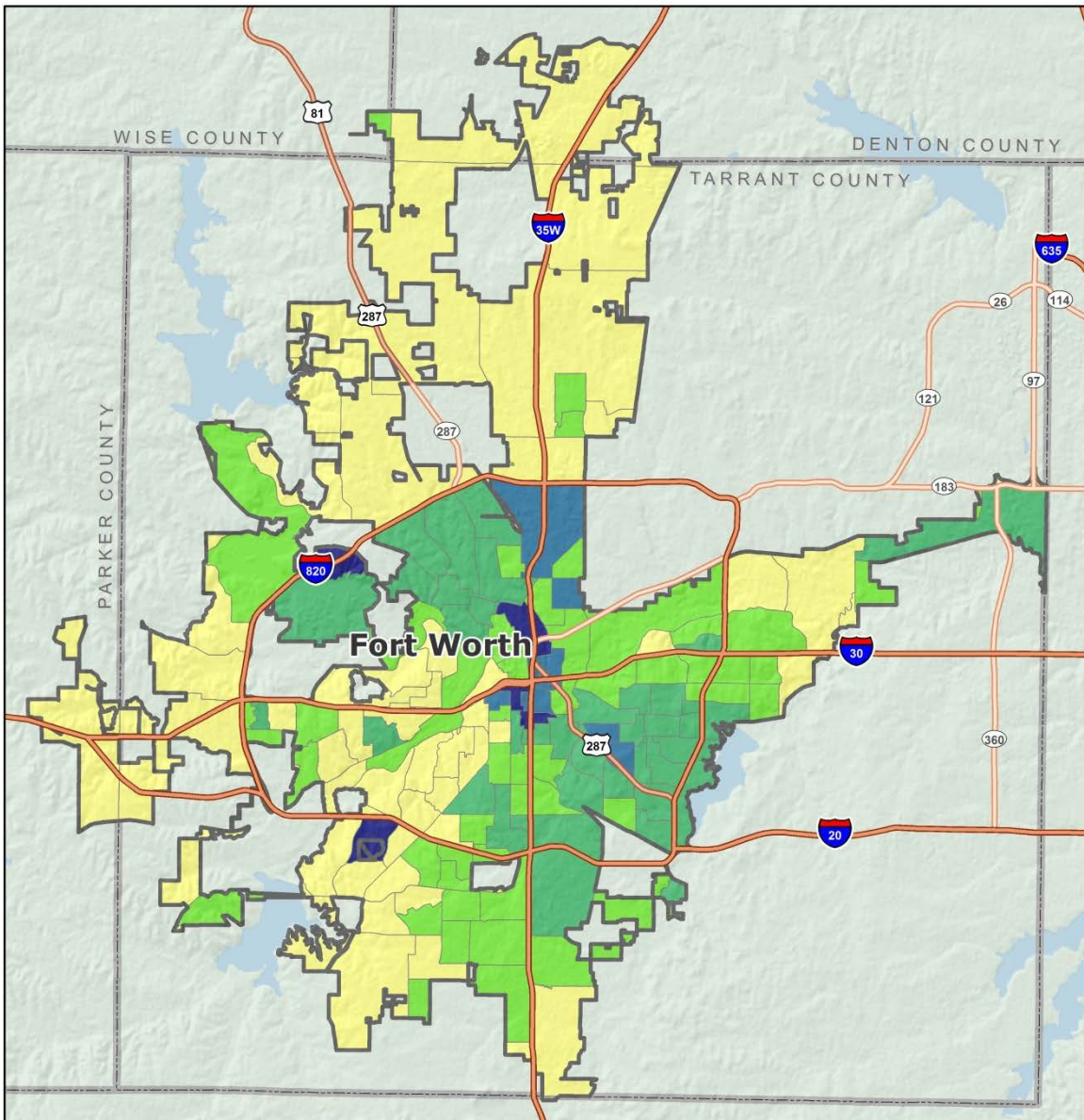
Data Source: FFIEC HMDA, 2004-2011

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Disproportionate Share Threshold

0 3 Miles

Map V.5
Denial Rates for White Applicants by Census Tract
 City of Fort Worth
 2004–2011 HMDA Data



LEGEND

2004-2011 Loan Denial Rates for White Applicants
 2004-2011 Average Loan Denial Rate for White Applicants in Fort Worth = 14.8%
 Disproportionate Share Threshold = 24.8%

Denial Rate	Color
0.0% - 14.8%	Lightest Yellow
14.9% - 24.8%	Yellow-Green
24.9% - 39.8%	Green
39.9% - 54.8%	Dark Green
54.9% - 70.0%	Darkest Green

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: FFIEC HMDA, 2004-2011

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Disproportionate Share Threshold

0 3 Miles

Part of the HMDA requirements include information regarding the reason for a loan denial, although financial institutions are not uniformly required to fill out this field. Nevertheless, the most frequently cited categories of denials were related to credit history and debt-to-income ratio, as shown below in Table V.6. The number of loans denied due to credit history declined in the run-up to 2007 before peaking in that year. The number of loans denied due to an unfavorable debt-to-income ratio peaked a year later. After reaching those peaks, the number of loans denied due to debt-to-income ratio and poor credit history fell with the total number of loan denials. However, credit history and debt-to-income remained the most common reasons for denial in every year, and the share of loans denied for these reasons has only increased since 2008.

Table V.6
Loan Applications by Reason for Denial

City of Fort Worth
2004–2011 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	Total
Debt-to-Income Ratio	442	489	477	507	375	249	303	271	3,113
Employment History	75	92	93	91	48	56	45	25	525
Credit History	827	969	802	911	429	287	336	341	4,902
Collateral	125	270	283	245	165	125	123	79	1,415
Insufficient Cash	65	87	84	84	77	40	38	20	495
Unverifiable Information	171	397	335	232	112	70	93	65	1,475
Credit Application Incomplete	267	325	334	369	142	89	92	87	1,705
Mortgage Insurance Denied	1	2	1	5	6	4	3	1	23
Other	504	924	811	435	160	101	124	78	3,137
Missing	1,318	1,010	1,129	541	680	640	535	412	6,265
Total	3,795	4,565	4,349	3,420	2,194	1,661	1,692	1,379	23,055

Table V.7 below shows denial rates by income in the City of Fort Worth. As one might expect, loan applications from low income households were denied more frequently than loan applications from high income households, and the rate of loan denial fell as household income increased. Households with yearly incomes of less than \$15,000 were denied an average of 55.9 percent of the time, while those with incomes above \$75,000 were denied 12.2 percent of the time on average.

Table V.7
Denial Rates by Income of Applicant

City of Fort Worth
2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	56.0%	58.9%	50.0%	54.3%	53.6%	59.2%	69.1%	42.9%	55.9%
\$15,001–\$30,000	33.9%	34.9%	31.5%	30.8%	35.2%	29.5%	34.7%	31.9%	33.0%
\$30,001–\$45,000	23.0%	22.2%	22.4%	22.0%	21.8%	19.2%	22.2%	22.0%	22.1%
\$45,001–\$60,000	19.8%	19.4%	18.9%	18.0%	17.0%	15.5%	15.5%	15.8%	18.1%
\$60,001–\$75,000	15.3%	15.2%	14.6%	14.0%	13.4%	13.2%	14.0%	15.6%	14.5%
Above \$75,000	11.9%	13.8%	12.7%	12.5%	11.1%	11.0%	11.7%	10.1%	12.2%
Data Missing	20.9%	22.6%	13.3%	22.5%	25.1%	37.1%	42.9%	35.7%	21.2%
Total	19.6%	19.4%	17.6%	17.6%	16.8%	16.1%	17.8%	16.4%	18.0%

Table V.8, below, presents denial rates segmented by race or ethnicity and income. Minority racial and ethnic applicants often faced much higher loan denial rates than white applicants, even after correcting for income. For example, black applicants experienced higher loan denial rates than white applicants across all income levels; at incomes of \$30,001 to \$45,000, black

applicants experienced a denial rate of 31.3 percent compared to the white denial rate of 18.5 percent for that group. At incomes over \$75,000, black applicants had a denial rate of 23.7 percent compared to 10.1 percent for white applicants. Interestingly, for Asian applicants the denial rate was slightly lower for the \$60,001 to \$75,000 income earners than for those who earned more than \$75,001; this may suggest loan denial based on factors other than financial status, possibly representing discrimination.

Table V.8
Denial Rates of Loans by Race/Ethnicity and Income of Applicant

City of Fort Worth
2004–2011 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	33.3%	47.7%	34.8%	25.5%	19.4%	15.5%	13.8%	26.1%
Asian	53.6%	33.9%	19.2%	17.1%	11.6%	17.1%	19.2%	18.4%
Black	62.3%	48.9%	31.3%	27.7%	23.9%	23.7%	40.8%	29.9%
White	53.3%	27.0%	18.5%	14.8%	12.3%	10.1%	15.6%	14.8%
Not Available	64.8%	51.5%	31.5%	26.0%	18.8%	16.6%	32.0%	25.1%
Not Applicable	%	18.8%	14.0%	30.0%	10.9%	15.2%	8.1%	16.0%
Average	55.9%	33.0%	22.1%	18.1%	14.5%	12.2%	21.2%	18.0%
Non-Hispanic	53.6%	35.6%	20.2%	16.1%	13.2%	10.9%	18.0%	15.7%
Hispanic	56.7%	27.0%	23.4%	22.6%	19.2%	18.0%	19.2%	23.1%

Predatory Lending

In addition to modifications implemented in 2004 for documenting loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;⁶²
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high annual percentage rate (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.⁶³

For the 2012 AI analysis, only originated owner-occupied home purchase loans qualifying as HALs were examined for 2004 through 2010. These high APR loans are considered predatory in nature, and owner-occupied home purchase loans are the greatest concern when examining access to fair housing opportunities. Table V.9, below, shows that between 2004 and 2011, there were 18,066 HALs for owner-occupied homes originated in Fort Worth, representing 17.2 percent of all loans. The number of HALs was highest by far in 2005 and 2006 and decreased afterward. By 2010, the rate of HALs at a low 2.4 percent, though it subsequently increased again to 3.4 percent in 2011.

⁶² Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. "HMDA Glossary." <http://www.ffiec.gov/hmda/glossary.htm#H>

⁶³ 12 CFR Part 203, http://www.ffiec.gov/hmda/pdf/regc_020702.pdf

Table V.9
Originated Owner-Occupied Loans by HAL Status

City of Fort Worth
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Other	12,933	13,445	14,847	13,824	9,699	8,088	7,636	6,776	87,248
HAL	2,602	5,568	5,474	2,241	1,190	566	187	238	18,066
Total	15,535	19,013	20,321	16,065	10,889	8,654	7,823	7,014	105,314
Percent HAL	16.7%	29.3%	26.9%	13.9%	10.9%	6.5%	2.4%	3.4%	17.2%

The geographic distribution of HALs in Fort Worth is presented on the following page in Map V.6. When disproportionate shares of HAL borrowers are seen in areas with high protected class populations, they can suggest discriminatory patterns in predatory lending. The following map presents the beginning of this analysis. Several tracts in the City showed average proportions of borrowers who received HALs in excess of the disproportionate share threshold of 27.2: these areas were overwhelmingly located within the beltway, in the southeast and northwest. Census tracts with the highest rate of HAL's—over 46 percent—were concentrated in the southeast of downtown, around the interchange of I-35W and I-30, and in Como. Predatory loans are most commonly seen for moderately priced homes, and these data show the highest HAL rates in areas with homes valued below the city median of \$121,900. By contrast, HAL's are relatively uncommon in areas with high home values in the southwest of downtown and in peripheral census tracts.

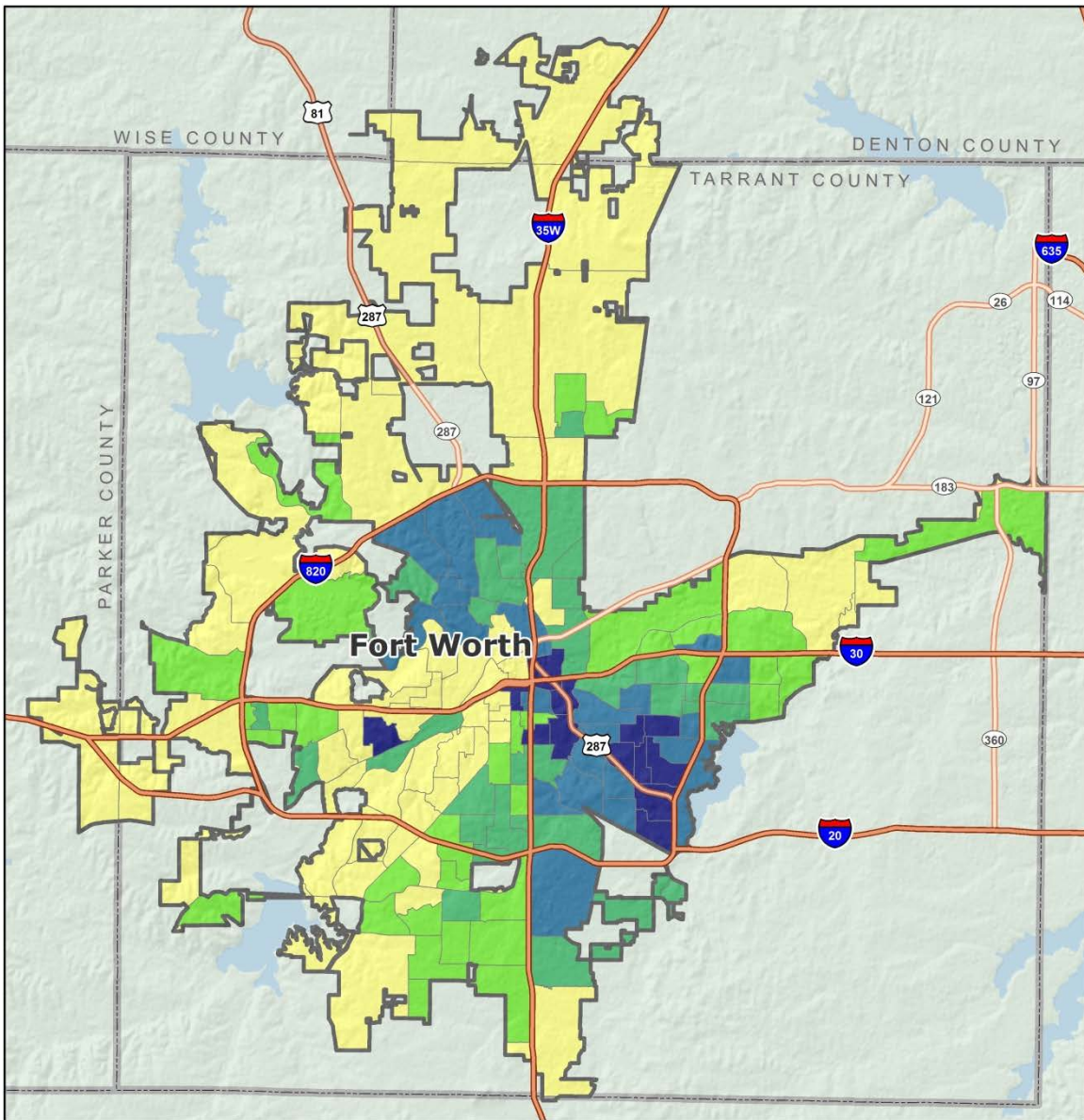
Though the average rate of HALs was 17.2 percent, it varied widely over the period and was most recently very low. But while HAL figures improved considerably after 2006, they are a measure of Fort Worth's underlying foreclosure risk for recent homeowners, and it is important to examine characteristics of applicants who received these HALs in the eight-year time period and may still be paying the high rates. As shown in Table V.10, below, the group with the greatest number of HALs between 2004 and 2011 was white applicants, with 11,946 such loans. Black applicants took out 3,330 HALs, and Hispanic applicants received 4,489 HALs over the seven-year period. Fortunately, the number of HALs decreased markedly from 2006 to 2010 for most racial and ethnic groups, though the figure for 2011 may be an early indication that HAL's are rebounding.

Table V.10
HALs Originated by Race of Borrower

City of Fort Worth
2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	24	39	43	18	1	3	1	1	130
Asian	64	141	134	48	25	11	7	2	432
Black	475	1,150	1,143	372	145	39	2	4	3,330
White	1,654	3,553	3,399	1,568	917	474	165	216	11,946
Not Available	355	683	754	233	102	39	12	15	2,193
Not Applicable	30	2	1	2	0	0	0	0	35
Total	2,602	5,568	5,474	2,241	1,190	566	187	238	18,066
Non-Hispanic	1,560	3,745	3,489	1,440	727	368	131	129	11,589
Hispanic	686	1,218	1,316	600	364	161	47	97	4,489

Map V.6
Rate of HALs by Census Tract
 City of Fort Worth
 2004–2011 HMDA Data



LEGEND

2004-2011 HAL Rates
 2004-2011 Average HAL Rate in Fort Worth = 17.2%
 Disproportionate Share Threshold = 27.2%

HAL Rate

0.0% - 17.2%	Light Yellow
17.3% - 27.2%	Light Green
27.3% - 36.0%	Medium Green
36.1% - 45.9%	Dark Green
46.0% - 57.5%	Dark Blue

Disproportionate Share Threshold (indicated by a dashed line between 27.2% and 27.3%)

- County Boundaries (dashed line)
- City Boundaries (solid line)
- Census Tracts (thin solid line)
- Major Roads (thick orange line)

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: FFIEC HMDA, 2004-2011

0 3 Miles

While the highest numbers of HALs were often seen for white applicants, further evaluation of the HMDA data revealed that HALs were issued to black and Hispanic applicants in unusually high proportions, as shown below in Table V.11. In total, 25.7 percent of loans taken by Hispanic applicants were HALs, while black applicants received HAL's at a rate of 33.1 percent. The most pronounced imbalances in HAL rates by race were seen in the years leading up to 2006, when black applicants received HAL's at a rate that was at least double that of white applicants, on average, and the rate of HAL's to Hispanic borrowers was consistently 10 percentage points higher than the rate of HAL's to non-Hispanic applicants. While these data on their own do not imply that impediments to fair housing exist, the higher rate of HALS among black and Hispanic applicants could point to discrimination in the lending market.

Table V.11
Rate of HALs Originated by Race/Ethnicity of Borrower

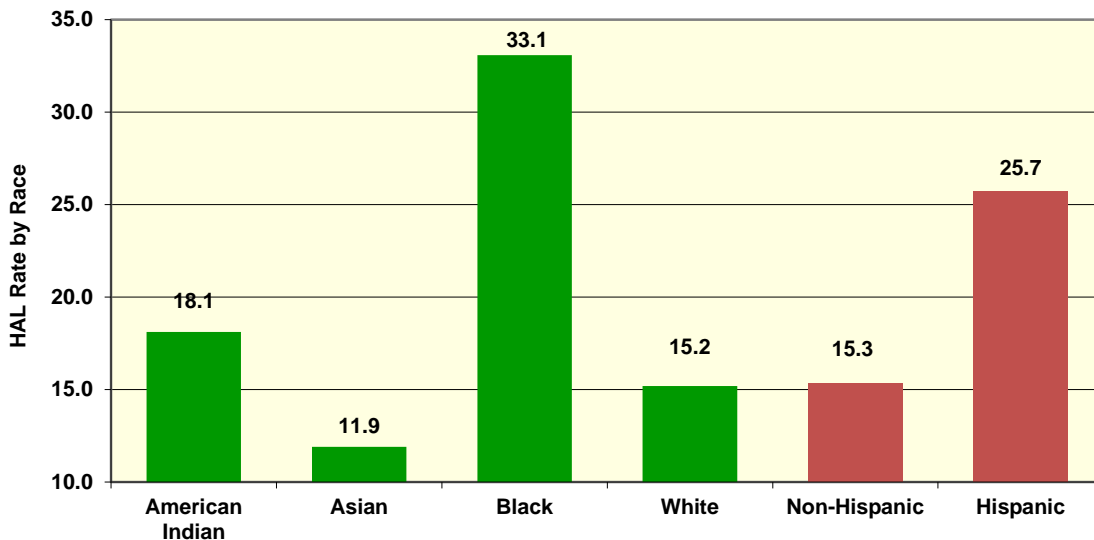
City of Fort Worth
 2004–2011 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	Average
American Indian	18.6%	27.3%	29.5%	18.8%	1.9%	5.7%	1.8%	02.3%	18.1%
Asian	11.7%	21.0%	19.9%	8.7%	7.1%	3.7%	2.5%	.8%	11.9%
Black	29.5%	54.5%	50.4%	25.1%	17.4%	6.3%	.3%	.8%	33.1%
White	15.2%	25.7%	23.3%	12.8%	10.7%	6.9%	2.7%	3.9%	15.2%
Not Available	15.8%	30.8%	28.9%	13.9%	9.8%	4.8%	1.7%	2.1%	18.2%
Not Applicable	19.6%	7.4%	25.0%	66.7%	.0%	.0%	.0%	%	18.0%
Average	16.7%	29.3%	26.9%	13.9%	10.9%	6.5%	2.4%	3.4%	17.2%
Non-Hispanic	16.0%	27.4%	24.3%	12.3%	8.9%	5.6%	2.2%	2.4%	15.3%
Hispanic	27.1%	38.1%	35.9%	21.2%	20.8%	12.9%	3.9%	9.3%	25.7%

Diagram V.3, below, shows the rates of HALs issued to applicants by race and ethnicity and visually demonstrates that American Indian, black, and Hispanic applicants were issued HALs more frequently than white and Asian applicants. These groups may face high foreclosure risk.

Diagram V.3
HAL Rates by Race

City of Fort Worth
 2004–2012 HMDA Data



Geographical examination of HALs by race or ethnicity of borrowers can be illustrative when working to identify barriers to fair housing choice. Analysis along these dimensions highlights areas that are particularly susceptible to these loans; where the residents of such areas are disproportionately represented by racial or ethnic minorities, a high prevalence of these loans may signal the presence of barriers to fair housing choice in the lending industry. In some cases, members of specific ethnic groups that face disproportionately high rates of HALs in general face especially high rates in areas in which such groups have not traditionally been concentrated

The concentration of HALs for black borrowers is shown the following page in Map V.7. Tracts with the highest rates of HALs to black borrowers were scattered across the City, and though highest shares were in census tracts west of I-35W, some tracts showed rates as high as 100 percent. Comparison of these maps with the demographic maps detailing the distribution of the black population suggests that the highest rates of HALs to black applicants occur outside of areas that have traditionally shown high concentrations of black residents.

Map V.8 presents the distribution of HALs for Asian borrowers in the City. Tracts in which Asian borrowers were subject to HALs at higher than 21.9 percent, the disproportionate share threshold, were scattered throughout the city. There were several areas in which the rate of HALs to Asian borrowers was particularly high: in the southeast of downtown, along State Road 287, north of the interchange of I-30 and I-35W, around Belmont Terrace, and in the area north of Lake Worth near the Fort Worth Refuge.

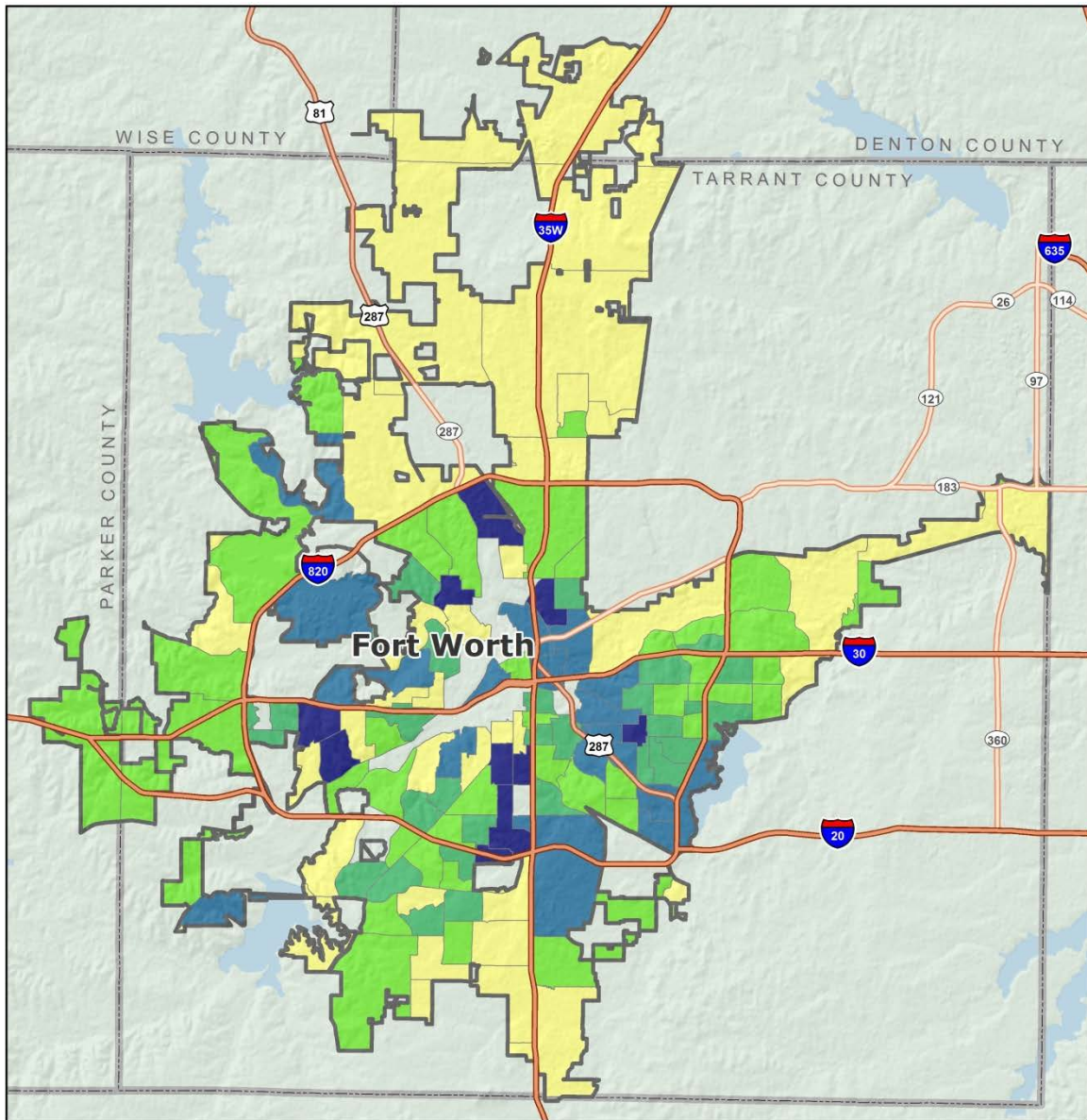
Data on the rate of HALs for Hispanic applicants are presented in Map V.9. The disproportionate share threshold was 35.7 percent, and a few tracts had disproportionate shares of HALs, generally in the southeast of downtown along State Road 287, though one census tract in Como and another just north of the I-35W and I-30 interchange also had HAL rates of at least 53.4 percent.

The rates of HALs to white applicants are presented in Map V.10, which shows that tracts with particularly high shares of HALs were similar to those in which Hispanic borrowers experienced high rates of these loans, notably in Como, and where both Hispanic and Asian borrowers had experienced high HAL rates, particularly inside the beltway, along State Road 287 in the southeast.

COMMUNITY REINVESTMENT ACT DATA

Adequate provision of neighborhood services is one element of fair housing choice, in that fair housing options are increased when desirable services such as good schools or health care are available to all persons, in many kinds of neighborhoods. Neighborhood services can often be absent in low- and moderate-income areas where persons of protected classes are often most concentrated. Neighborhood revitalization efforts can encourage the provision of essential services in these areas, leading to better neighborhoods and housing choice. The quality and availability of public services and facilities can be lower in these areas as well, but small business and economic development lending on the part of financial institutions can also be unevenly distributed. Investment in declining neighborhoods is critical to neighborhood vitality and adequate housing choice, measured by the presence or absence of residential and commercial investment in struggling areas by banks and other financial institutions.

Map V.7
HALs to Black Borrowers by Census Tract
 City of Fort Worth
 2004–2011 HMDA Data



LEGEND

2004-2011 HAL Rates for Black Borrowers
 2004-2011 Average HAL Rate for Black Borrowers in Fort Worth = 33.1%
 Disproportionate Share Threshold = 43.1%

HAL Rate	Color
0.0% - 33.1%	Light Yellow
33.2% - 43.1%	Light Green
43.2% - 56.0%	Medium Green
56.0% - 71.4%	Dark Green
71.5% - 100%	Dark Blue

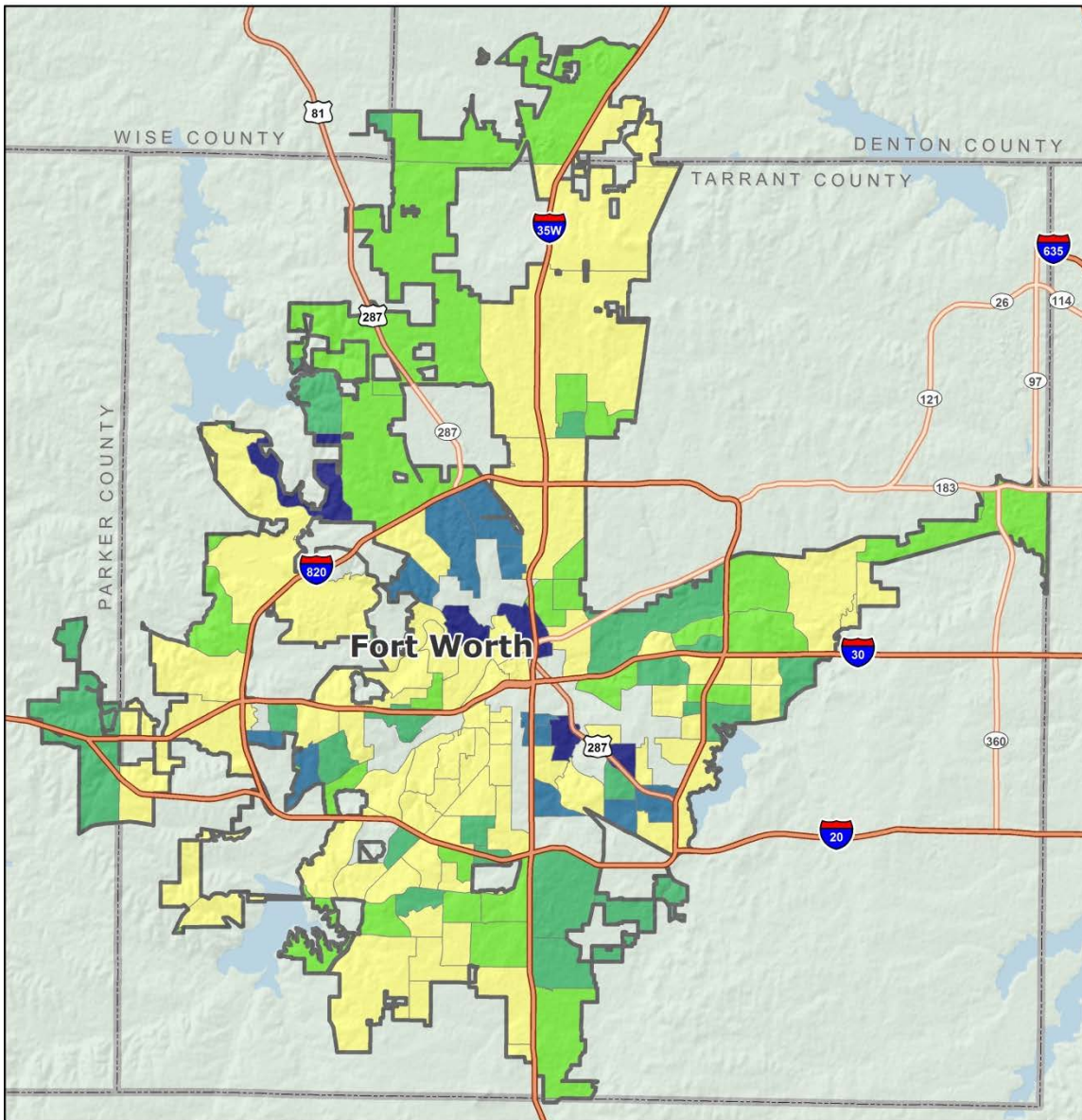
NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: FFIEC HMDA, 2004-2011

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

0 3 Miles

Map V.8
HALs to Asian Borrowers by Census Tract
 City of Fort Worth
 2004–2011 HMDA Data



LEGEND

2004-2011 HAL Rates for Asian Borrowers
 2004-2011 Average HAL Rate for Asian Borrowers in Fort Worth = 11.9%
 Disproportionate Share Threshold = 21.9%

HAL Rate
0.0% - 11.9%
12.0% - 21.9%
22.0% - 47.9%
50.0% - 73.9%
74.0% - 100%

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

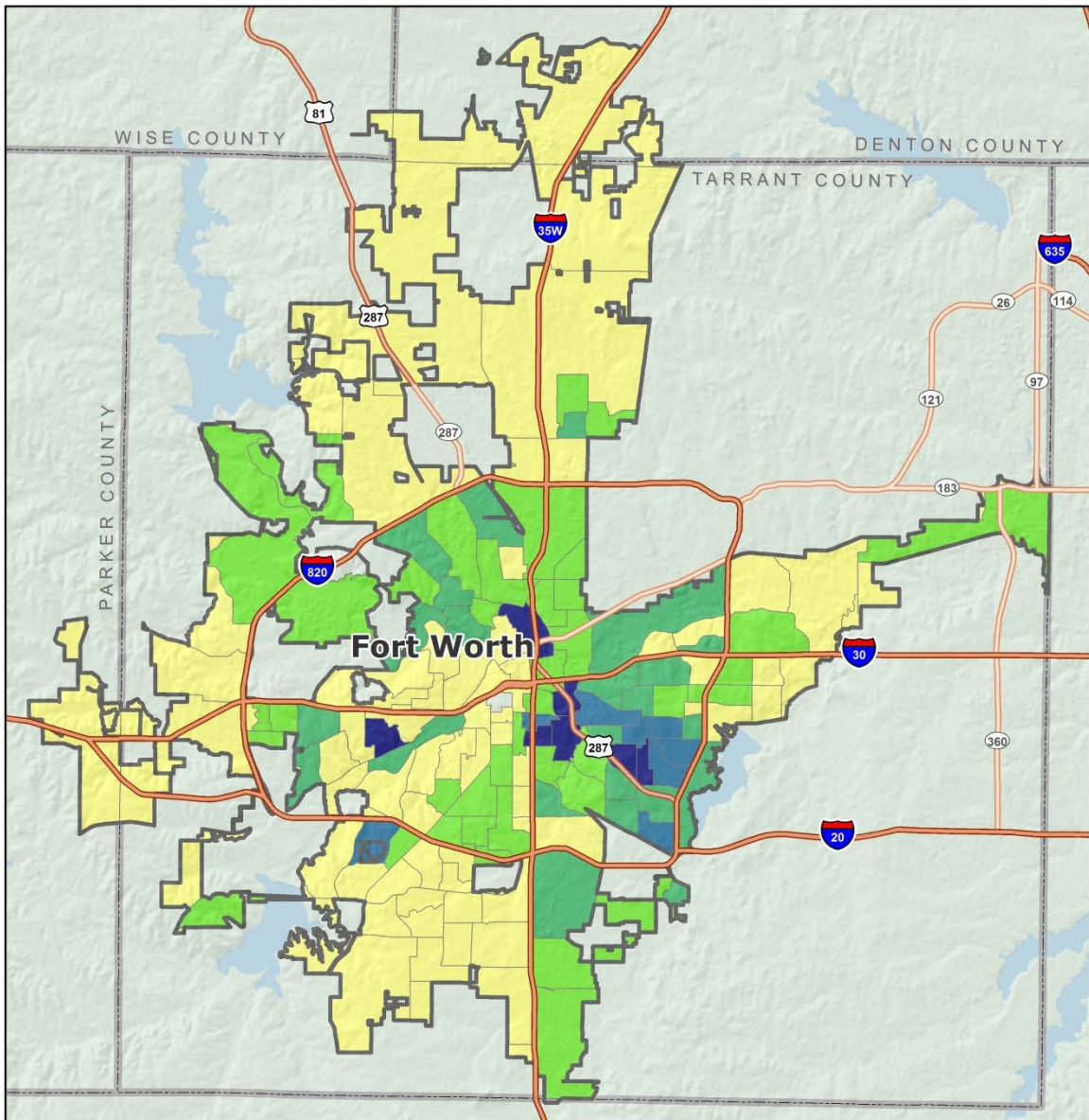
Data Source: FFIEC HMDA, 2004-2011

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Disproportionate Share Threshold

0 3 Miles

Map V.9
HALs to Hispanic Borrowers by Census Tract
 City of Fort Worth
 2004–2011 HMDA Data



LEGEND

2004-2011 HAL Rates for Hispanic Borrowers
 2004-2011 Average HAL Rate for Hispanic Borrowers in Fort Worth = 25.7%
 Disproportionate Share Threshold = 35.7%

HAL Rate	Color
0.0% - 25.7%	Light Yellow
25.8% - 35.7%	Light Green
35.8% - 45.0%	Medium Green
45.0% - 53.3%	Dark Green
53.4% - 66.7%	Dark Blue

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

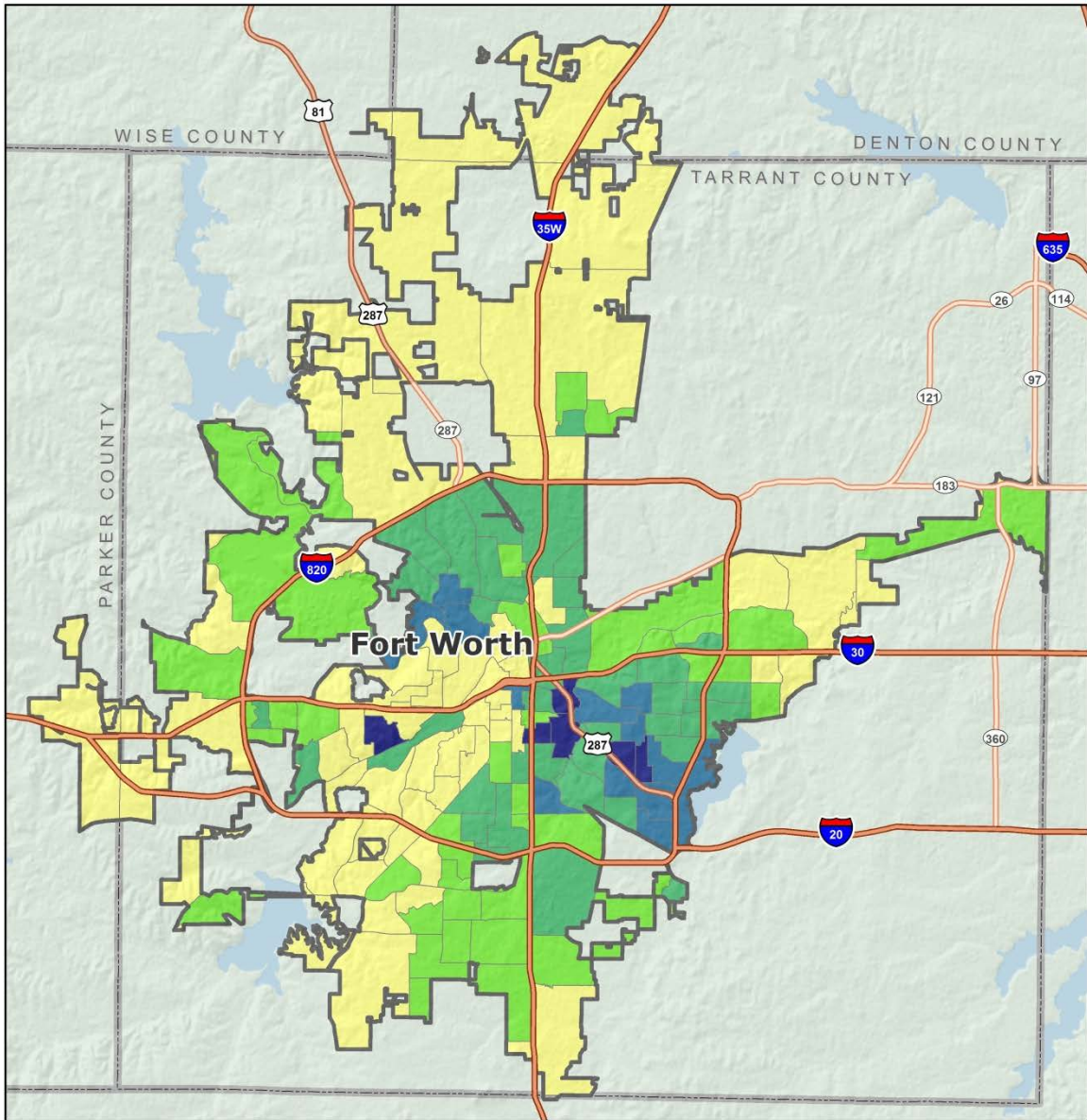
Data Source: FFIEC HMDA, 2004-2011

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Disproportionate Share Threshold

0 3 Miles

Map V.10
HALs to White Borrowers by Census Tract
 City of Fort Worth
 2004–2011 HMDA Data



LEGEND

2004-2011 HAL Rates for White Borrowers
 2004-2011 Average HAL Rate for White Borrowers in Fort Worth = 15.2%
 Disproportionate Share Threshold = 25.2%

HAL Rate	Color
0.0% - 15.2%	Light Yellow
15.3% - 25.2%	Light Green
25.3% - 37.8%	Medium Green
37.9% - 50.4%	Dark Green
50.5% - 63.0%	Dark Blue

NOTE: A disproportionate share exists when the share of a population in a given area is at least 10 percentage points greater than the study area average.

Data Source: FFIEC HMDA, 2004-2011

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

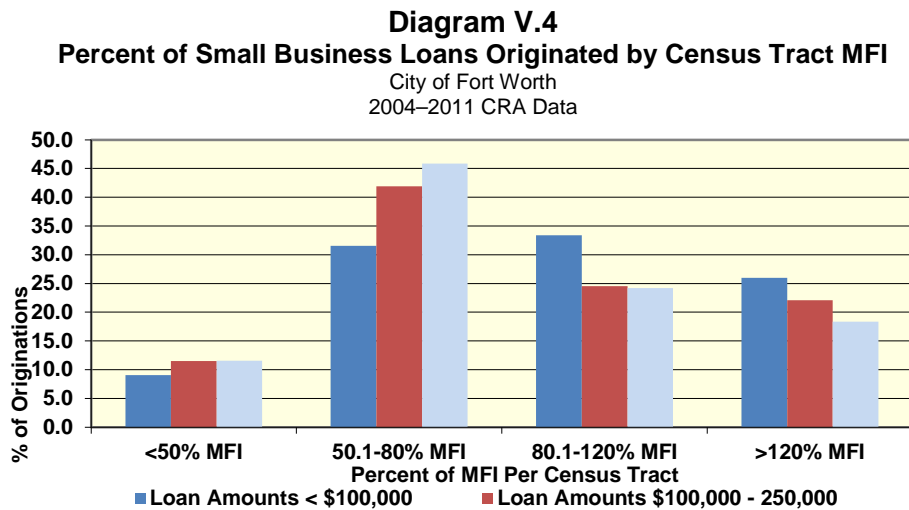
Disproportionate Share Threshold

0 3 Miles

While home mortgage and improvement loans are important for improving residential areas, small and disadvantaged business loans are essential for many commercial services. Economic aid to businesses can be measured through the Community Reinvestment Act (CRA) data. As mentioned in the beginning of this section, the CRA was enacted in 1977 and is intended to encourage lending institutions to meet the credit needs of the communities in which they operate, including low- and moderate-income areas. Along with the HMDA data presented previously, the FFIEC also releases data mandated by the CRA.

Examination of CRA data revealed that between 2000 and 2011, 178,001 small business loans were extended to businesses in tracts that make up the City of Fort Worth. Of these, 65,872 loans went to businesses with annual revenues of less than \$1 million. A large majority of all loans, 168,773 in total, were valued under \$100,000.

Small business loans were also analyzed to determine the location of funding in relation to median family income (MFI) levels. Diagram V.4, below, presents the distribution of small business loans by value and by percent of MFI by Census tract. As shown, few loans went to areas with 50 percent or less of the MFI, despite the fact that these loans were designed to aid low-income as well as moderate-income areas.

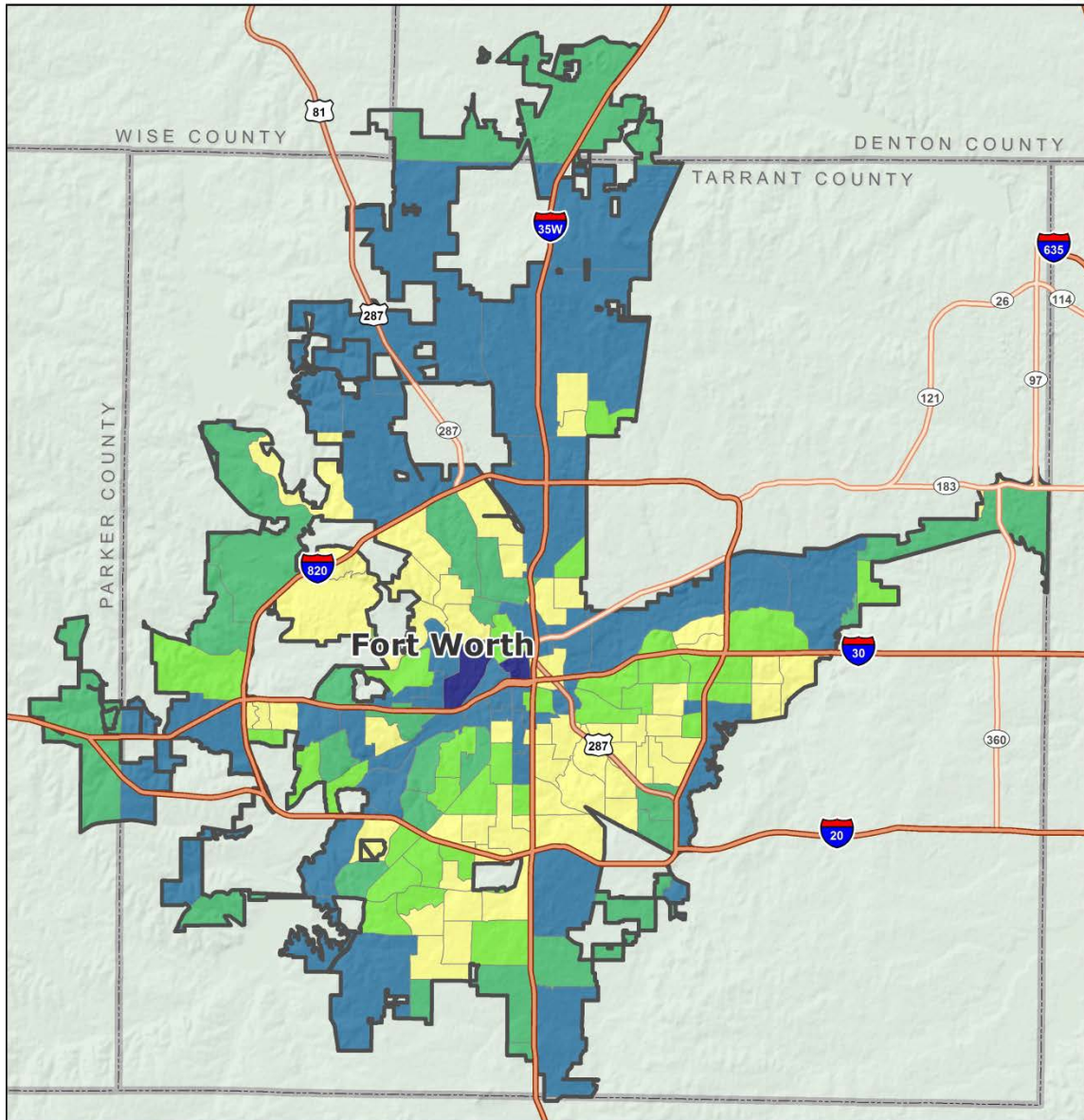


An uneven investment of small business loans can indicate an impediment to fair housing choice when lower-income areas receive fewer loans than more affluent neighborhoods and when protected class populations are more concentrated in these areas; this can suggest they were offered fewer commercial services and opportunities. Geographic analysis by Census tract shows where the most loans and the most valuable loans were distributed; when compared to poverty rates or other indicators, impediments can be identified.

Map V.11, on the following page, illustrates the number of loans issued to businesses in City Census tracts from 2000 through 2011, divided by the number of residents in those tracts (this operation provides a standardized measure of loan distribution throughout the city and facilitates comparison between areas of different population sizes). The tracts that received the highest numbers of loans were located to the northwest of the interchange inside the beltway; these tracts, which encompassed the downtown area and the area in and around the Museum of Science and History, received as many as seven loans for every tract resident. Comparison of

this map with maps detailing the distribution of poverty reveal that areas that high rates of poverty tended to attract a below-average rate of CRA small business loans per resident. Notable examples include the area inside the beltway to the southeast and the area of Como.

Map V.11
Number of Small Business Loans
 City of Fort Worth
 2000–2011 CRA Data



LEGEND

2000-2011 Number of Small Business Loans Per 100 Residents
 2000-2011 Average Number of Small Business Loans Per 100 Residents in Fort Worth = 41.2

Loans Per 100 Residents	Color
4.5 - 16.8	Yellow
16.9 - 29.0	Light Green
29.1 - 41.2	Medium Green
41.3 - 389.6	Dark Green
389.7 - 737.9	Dark Blue

----- Average -----

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Data Source: FFIEC CRA 2000-2011, 2000 Census

0 3 Miles

Map V.12, on the following page, illustrates the dispersal of loan funding for businesses in City Census tracts by loan dollars per resident. It shows that the highest-value CRA loans were concentrated in the downtown area, immediately northwest of the interchange. In that area, \$469.71 was issued for every tract resident. In general, tracts that received loans at an above average rate also tended to receive loans that were above-average in value. However, this tendency was not uniform across the city: for example, the census tract containing La Gran Plaza mall received loans valued at above the City average per tract in spite of having received fewer than the average number of loans per tract.

B. FAIR HOUSING COMPLAINTS

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

HUD maintains records of complaints that implicate potential violations of federal housing law, as described previously in the Complaint Process Review. Over the period from January 2004 through October 2013, HUD reported 1,853 complaints filed in the City, as shown below in Table V.12⁶⁴. The total number of complaints ranged from a low of 143 in 2004 to a high of 243 in 2011, excluding 2013 as a partial year.

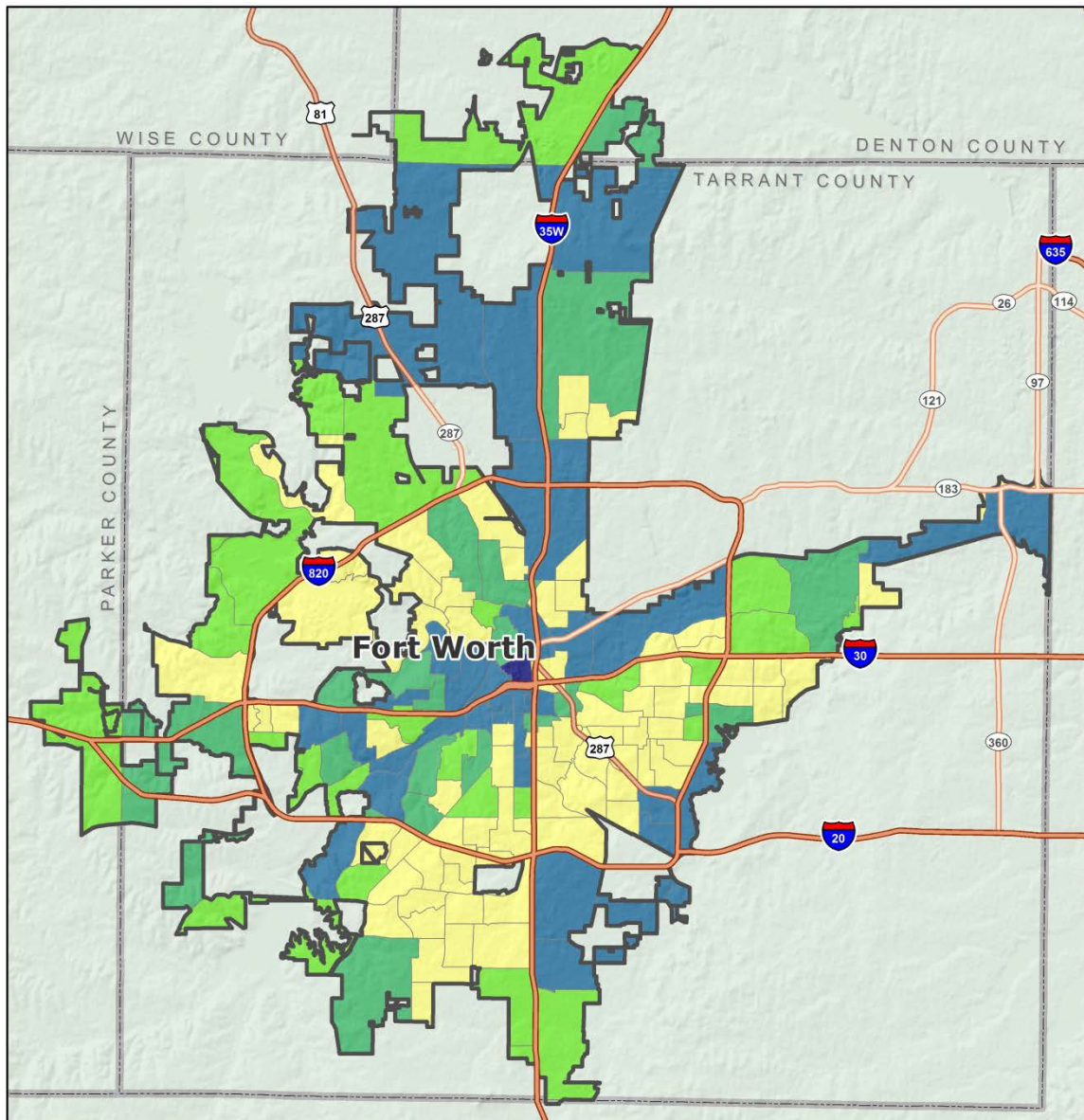
This table also presents complaint data by basis, or the protected class status of the person allegedly aggrieved in the complaint. Complainants may cite more than one basis, so the number of bases cited can exceed the total number of complaints. As shown, a total of 2,498 bases were cited in relation to the 1,853 complaints filed. Race was the most commonly cited basis, with 745 complaints, followed by disability (656 complaints), national origin (425 complaints), and sex (304 complaints).

Table V.12
Fair Housing Complaints by Basis
City of Fort Worth
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Race	38	64	71	67	67	70	107	103	88	70	745
Disability	33	46	65	53	59	63	78	95	80	84	656
National Origin	56	69	36	32	64	49	21	45	34	19	425
Sex	24	25	17	47	25	31	25	47	46	17	304
Family Status	11	11	22	11	23	21	11	32	16	7	165
Retaliation	4	10	21	15	12	18	19	36	11	19	165
Religion	1		4		2	14	9	1		3	36
Color	1								1		2
Total Bases	168	225	236	225	252	266	270	359	278	219	2,498
Total Complaints	143	184	176	168	186	203	178	243	214	158	1,853

⁶⁴ Data were provided by HUD in October 2013.

Map V.12
Dollar Value of Small Business Loans
 City of Fort Worth
 2000-2011 CRA Data



LEGEND

2000-2011 Small Business Loan Dollars Per Resident
 2000-2011 Average Value of Small Business Loans Per Resident in Fort Worth = \$15.22

Loan Dollars Per Resident	Color
\$0.26 - 5.24	Light Yellow
\$5.25 - 10.23	Light Green
\$10.24 - 15.22	Medium Green
\$15.23 - 242.46	Dark Green
\$242.47 - 469.71	Dark Blue

Average: \$15.22

- County Boundaries
- City Boundaries
- Census Tracts
- Major Roads

Data Source: FFIEC CRA 2000-2011, 2000 Census

0 3 Miles

In addition to the basis for discrimination, HUD records the issue, or alleged discriminatory action related to each complaint. These are presented in Table V.13, below. The Annual details, as well as those address in the “Other” category are presented in Table A.1 of the Appendix. Still, as was the case with complaint bases, more than one issue may be associated with each complaint. In Fort Worth, 2,881 issues were cited in complaints filed between January 2004 and October 2013. The most common issues in these complaints were discriminatory terms, conditions, privileges, or services and facilities—1,180 complaints concerned this issue—followed by discrimination in terms, conditions, or privileges relating to rental (451 complaints), failure to make reasonable accommodation (339 complaints), and discriminatory refusal to rent (286 complaints). Discriminatory acts under Section 818, which refers to issues of intimidation or coercion, was also frequently cited. A large proportion of issues in this complaint dataset related specifically to rental transactions, which suggests that discriminatory acts leading to the filing of fair housing complaints may be more common in the rental market. A high number of complaints in a given issue may indicate patterns of discrimination that represent impediments to fair housing choice in Fort Worth.

Table V.13
Fair Housing Complaints by Issue
 City of Fort Worth
 2004–2012 HUD Data

Issue	Total
Discriminatory terms, conditions, privileges, or services and facilities	1,180
Discrimination in term, conditions or privileges relating to rental	451
Failure to make reasonable accommodation	339
Discriminatory refusal to rent	286
Discriminatory acts under Section 818 (coercion, etc.)	265
Discriminatory financing (includes real estate transactions)	117
Failure to permit reasonable modification	37
Discriminatory refusal to rent and negotiate for rental	31
Discrimination in terms, conditions, privileges relating to sale	28
Discrimination in services and facilities relating to rental	13
Steering	13
Discriminatory refusal to sell	12
Discrimination in the selling of residential real property	12
Other discriminatory acts	12
Discriminatory refusal to sell and negotiate for sale	11
False denial or representation of availability - rental	10
All Other	64
Total Issues	2,881
Total Complaints	1,853

Housing complaints filed with HUD can also be examined by closure status, as shown in Table V.14, below. Of the 1,853 total complaints, 623 were found to have “No Cause”, which means that discrimination was not found, while comparatively few were discovered to have “Cause” (9 complaints). However, the large number of complaints that were conciliated or settled (1,064 complaints) may obscure the true extent of discrimination in Fort Worth. The rate of successful conciliation varied from year to year, ranging between 48.8 percent and 70.6 percent.

Table V.14
Fair Housing Complaints by Closure Status

City of Fort Worth
2004–2012 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Conciliated / Settled	95	103	94	82	103	114	91	135	151	96	1,064
No Cause	43	61	52	76	77	73	69	97	56	19	623
Administrative Closure	5	15	30	10	6	16	16	9	5	9	121
Cause (FHAP)		5					2			2	9
Open								2	2	32	36
Total Complaints	143	184	176	168	186	203	178	243	214	158	1,853

Table V.15, below, presents the bases cited for the complaints found to be with cause, many of which were successfully conciliated or settled. The 1,073 complaints included in this table were those in which the complaint was either conciliated or settled, or found to have cause. Of those 1,073 complaints, there were 1,412 bases cited, a majority of which related to disability (cited in 401 complaints), race (392 complaints), and national origin (264 complaints)⁶⁵. These bases represented classes of persons protected under the federal Fair Housing Act.

Table V.15
Fair Housing Complaints Conciliated or Found With Cause by Basis

City of Fort Worth
2004–2012 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Disability	23	21	42	27	34	38	49	58	51	58	401
Race	19	42	34	34	31	28	51	52	58	43	392
National Origin	40	43	16	10	39	35	11	30	27	13	264
Sex	16	14	6	24	11	17	6	24	36	5	159
Family Status	8	6	13	6	15	13	3	15	10	4	93
Retaliation	3	5	12	5	4	10	10	14	9	9	81
Religion					1	9	8		2		20
Color	1								1		2
Total Bases	110	131	123	106	135	150	138	193	194	132	1,412
Total Complaints	95	108	94	82	103	114	93	135	151	98	1,073

The 1,073 complaints conciliated or found to be with cause are separated by issue, or discriminatory action, in Table V.16, on the following page. The most commonly cited issues in these complaints were discriminatory terms, conditions, privileges, or services and facilities; discrimination in terms, conditions, or privileges relating to rental; and failure to make reasonable accommodation. The proportion of complaints represented by each issue in this table generally accords with the picture presented in Table V.13, above, though complaints not found to have cause are not represented in Table V.16. Discriminatory refusal to rent and coercive discrimination under Section 818 represent a sizeable portion of complaints found to have cause. There are also numerous complaints associated with failure to make reasonable accommodation. However, many categories still have the word “rental”. Hence, most of the valid complaint activity comes through the rental markets.

⁶⁵ These numbers represent the number of complaints that include these bases; recall that more than one basis may be cited per complaint.

Table V.16
Fair Housing Complaints Conciliated or Found With Cause by Issue
 City of Fort Worth
 2004–2012 HUD Data

Issue	Total
Discriminatory terms, conditions, privileges, or services and facilities	717
Discrimination in term, conditions or privileges relating to rental	251
Failure to make reasonable accommodation	219
Discriminatory refusal to rent	144
Discriminatory acts under Section 818 (coercion, etc.)	136
Discriminatory financing (includes real estate transactions)	59
Failure to permit reasonable modification	26
Discriminatory refusal to rent and negotiate for rental	15
Discrimination in terms, conditions, privileges relating to sale	14
Steering	9
False denial or representation of availability - rental	8
Discrimination in services and facilities relating to rental	7
Discrimination in services and facilities relating to sale	5
All Other	33
Total Issues	1,643
Total Complaints	1,073

FORT WORTH HUMAN RELATIONS COMMISSION

Data on complaints of fair housing problems were received from the Fort Worth Human Relations Commission (HRC), with 989 complaints reported to this agency from 2009 to 2013, as shown below in Table V.17.⁶⁶ These data demonstrate that more complaints were filed with the HRC than were filed with HUD over a similar time period in the City⁶⁷. The total number of complaints to Fort Worth Human Relations Commission ranged from a low of 244 in 2010 to a high of 308 in 2011, excluding 2013 as a partial year.

Table V.17
Complaints by Basis
 City of Fort Worth
 2009 – 2013 FWHRC

Basis	2009	2010	2011	2012	2013	Total
Race	78	87	90	92	69	416
Disability	55	73	85	74	95	382
National Origin	45	33	43	36	23	180
Sex/Gender	26	23	43	53	16	161
Familial Status	18	7	24	20	11	80
Retaliation	15	11	21	9	9	65
Religion	14	9	.	3	2	28
Sexual Orientation	.	1	2	1	1	5
Color	.	.	.	1	.	1
Harassment	1	1
Total Basis	252	244	308	289	226	1,319
Total Complaints	200	177	219	217	176	989

The above table also presents complaint data by basis, or the protected class status of the person allegedly aggrieved in the complaint. Like HUD, the HRC allows complainants to claim more than one basis for each complaint. The most common bases for discrimination were race

⁶⁶ Data were provided by Project Sentinel on April 16, 2012.

⁶⁷ The total number of complaints filed with HUD from 2009 to 2013 was 591.

(416 complaints), disability (382 complaints), and national origin (180 complaints); these were also the three most common complaint bases reported by HUD, reinforcing the portrait of these groups as particularly susceptible to discrimination in the Fort Worth housing market.

The HRC also reports the issue of each complaint, or the discriminatory action alleged to have occurred, in addition to the basis. Table V.18, on the following page, shows that the most common problem was discrimination in terms or conditions, which represented 926, or more than 60 percent of the number of issues. Reasonable accommodation and refusal to rent were also commonly cited—215 and 208 times, respectively; each basis represented over 21 percent of complaints.

Table V.18
Complaints by Issue
City of Fort Worth
2009 – 2013 FWHRC

Issue	2009	2010	2011	2012	2013	Total
Discrimination in Terms and Conditions	188	168	205	201	164	926
Reasonable Accommodation	27	41	58	42	47	215
Refusal to Rent	16	27	32	70	63	208
Section 8	15	9	34	37	.	95
Retaliation	13	13	1	.	.	27
Discrimination in Real Estate / Finance	12	3	5	3	.	23
Harassment	15	15
Refusal to Sell	3	1	.	2	2	8
"Other" Discriminatory Issue	1	.	.	1	6	8
False Representation of Availability	4	.	2	.	.	6
Discriminatory in Advertising	2	1	1	.	.	4
Steering	.	4	.	.	.	4
Intimidation	3	3
Total Issues	299	267	338	356	282	1,542
Total Complaints	200	177	219	217	176	989

C. FAIR HOUSING SURVEY – PRIVATE SECTOR RESULTS

Additional evaluation of fair housing in the City of Fort Worth was conducted via an online survey of stakeholders conducted from July through the end of October, 2013. The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into the knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing. Results and comments related to the questions in the private sector are presented in the following narrative, and additional survey results are discussed in **Sections VI and VII**.

The 2013 Fort Worth Fair Housing Survey was completed by 504 persons and was conducted entirely online. Individuals solicited for participation included representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, and other groups involved in the fair housing arena. Most questions in the survey required simple “yes,” “no,” or “don’t know” responses, although many questions allowed the respondent to offer written comments. When many respondents reported that they were aware of questionable practices or barriers, or when multiple narrative responses indicated similar issues, findings suggested likely impediments to fair housing choice.

Numerical tallies of results and summaries of some comment-driven questions are presented in this section.

FAIR HOUSING IN THE PRIVATE SECTOR

In order to address perceptions of fair housing in Fort Worth's private housing sector, survey respondents were asked to identify their awareness of possible housing discrimination issues in a number of areas within the private housing sector, including the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industry,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

If respondents indicated that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented below in Table V.19.

Table V.19
Barriers to Fair Housing in the Private Sector

City of Fort Worth
2013 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	43	199	96	166	504
The real estate industry?	32	186	121	165	504
The mortgage and home lending industry?	39	164	135	166	504
The housing construction or accessible housing design fields?	26	168	142	168	504
The home insurance industry?	16	168	153	167	504
The home appraisal industry?	35	161	140	168	504
Any other housing services?	11	174	145	174	504

Rental Housing

Regarding barriers to fair housing choice in the rental housing market, 43 respondents, or nearly 13 percent of those who responded to this question, noted awareness of fair housing issues in this area. A majority of respondents (58.9 percent) indicated that they were not aware of barriers to fair housing choice, and a further 28.4 percent responded "Don't Know". As indicated previously, respondents were also asked to discuss questionable practices or barriers specifically in narrative format. Comments on this question highlighted perceived discrimination based on:

- Race, color, and ethnicity,
- Disability, including mental disability, and
- Families with children and single parents.

Citizenship or immigrant status was also mentioned as a perceived basis for discrimination, along with the use of Section 8 housing vouchers. Although neither immigrant status nor source of income are listed as protected classes in any of the fair housing laws applicable to Fort Worth, discrimination based on either may represent an impediment to fair housing choice where it produces a disproportionate impact on any of the protected classes enumerated in federal, state, or local fair housing laws.

Real Estate Industry

Just over 9 percent of respondents (32 individuals) reported awareness of barriers to fair housing choice in the real estate industry, though more than half did not know or did not respond. Commenters who described barriers they had perceived in the real estate industry cited steering (showing different homes, in different areas, to prospective homebuyers depending on their race, family status, etc.) and discrimination based on familial status, race, citizenship, and gender.

Mortgage and Home Lending Industry

When asked about awareness of barriers to fair housing choice in the mortgage and home lending industry, 39 respondents indicated that they were aware of such barriers, representing 11.5 percent of respondents to the question. Over 88 percent of those who responded to this question responded that were not aware of such barriers, or that they did not know. Commenters perceived that single women, along with racial and ethnic minorities, were frequent targets for higher interest rates on home mortgages and loans. Additionally, these groups were perceived to be denied loans at a higher rate than white male applicants or families.

According to commenters, discrimination based on income was an issue in Fort Worth; such discrimination was seen to apply not only to individual borrowers and homebuyers, but to geographic areas. According to one commenter, lenders will not lend money to prospective buyers who wish to purchase a home in the Stop Six community, while another commenter cited unwillingness to make loans in low-income areas in general.

Housing Construction or Accessible Housing Design Fields

Barriers to fair housing choice in the housing construction or accessible housing design fields were also addressed in the survey. Most of the respondents (92.3 percent) who answered this question reported that they were not aware, or that they did not know, about such barriers. The 26 respondents who stated that they were aware of such barriers were again asked to provide specific examples in the comment section. Commenters cited a general lack of accessible housing options, and stated that the needs of individuals with handicaps were not taken into account in renovation or new construction. Several respondents maintained that front or bathroom doors were too narrow to be accessed by individuals in wheelchairs.

Home Insurance Industry

Less than 5 percent of respondents noted awareness of barriers to fair housing choice in the home insurance industry, and the remaining 95 percent of those who answered this question

indicated that they had no awareness of, or did not know about, such barriers. Among those who provided specific examples of barriers in the home insurance industry, several cited redlining, or practices that could be described as redlining.

Home Appraisal Industry

Respondents were also asked whether they knew of questionable practices in the home appraisal industry. 35 respondents noted that they were aware of barriers to fair housing choice in the home appraisal industry, or more than 10 percent of respondents who answered the question. Many of the commenters suggested that neighborhoods with high concentrations of racial or ethnic minority individuals are appraised at lower levels than other neighborhoods.

Any Other Housing Services

Respondents were also asked to discuss their awareness of barriers to fair housing in any other area of the private housing sector. More than 95 percent of respondents indicated that they were not aware of barriers in any other housing services, or that they did not know about such housing barriers. Eleven respondents stated that they were aware of such barriers, and when asked to describe such barriers, commenters cited underservice of certain communities—specifically the Stop Six Community—and certain constituencies, including residents who rely on housing vouchers. One commenter cited neighborhood opposition to affordable housing⁶⁸, exerted through the city council, as a “major impediment” to fair housing choice in Fort Worth.

SUMMARY

Evaluation of the private housing sector included review of home mortgage loan application information, as well as mortgage lending practices, fair housing complaint data, and results from the private sector section of the 2013 Fair Housing Survey.

HMDA data were used to analyze differences in home mortgage application denial rates in the City of Fort Worth by race, ethnicity, sex, income, and Census tract. Evaluation of home purchase loan applications from 2004 through 2011 showed that there were 105,314 loan originations and 23,055 loan denials, for an eight-year average loan denial rate of 18 percent. The rate at which loans were denied generally declined over the eight-year period, with the exception of a brief spike in 2010. These HMDA data also showed that American Indian, black, and Hispanic applicants experienced higher rates of loan denials than white or Asian applicants: black applicants, in particular, were denied loans at nearly twice the rate of white applicants, a trend that held for middle to high-income earners of each racial group.

Analysis of originated loans with high annual percentage rates showed that American Indian, black, and Hispanic populations were also disproportionately issued these types of lower-quality loan products. In particular, black borrowers experienced a rate of HALs that was more than twice that of white applicants, while Hispanic borrowers received HALs at a rate that was over ten percentage points higher than that of non-Hispanics. When comparatively high rates of low-quality, high-annual percentage rate loans are issued disproportionately to these

⁶⁸ NIMBYism

particular groups, the burden of foreclosure may fall more heavily upon them than upon white or non-Hispanic residents.

Analysis of data from the CRA, which is intended to encourage investment in low- and moderate-income areas, showed that business loans did not tend to be directed toward the areas with lower incomes in Fort Worth as frequently as they were toward higher income areas. Many of these areas, such as Como and the southeast, were areas that tended to have high concentrations of minority residents.

Fair housing complaint data was requested from HUD and the Fort Worth Human Relations Commission (HRC). HUD data showed that 1,853 fair housing–related complaints were filed in the City between January 2004 and October 2013. The number of complaints filed with this agency varied by year, ranging from 143 to 243. The protected classes most impacted by discrimination, based on successfully conciliated complaints, were disability, race, and national origin, with the most common complaints relating to the following issues:

- Discriminatory terms, conditions, privileges, or services and facilities;
- Discrimination in terms, conditions, or privileges relating to rental; and
- Failure to make reasonable accommodation.

The implication of the HUD data, which is that discrimination based on race, disability, and national origin may be the most prevalent forms of discrimination in Fort Worth, is supported by complaint data from the HRC. Discriminatory terms and failure to make reasonable accommodations were also the most common issues reported by the HRC.

Results from the private sector portion of the 2013 Fair Housing Survey serve to illustrate how issues of discrimination and fair housing are perceived by stakeholders in the Fort Worth area. Perceived discrimination based on race was a common theme across all questions, while perceived discrimination based on sex and family status was seen as a particularly salient issue in the real estate, mortgage, and home lending industries. Income discrimination was also cited frequently, and although source-of-income is not protected under fair housing law in Fort Worth.

SECTION VI. FAIR HOUSING IN THE PUBLIC SECTOR

While the previous section presented a review of the status of fair housing in the private sector, this section will focus specifically on fair housing in the public sector. The U.S. Department of Housing and Urban Development (HUD) recommends that the AI investigate a number of housing factors within the public sector, including health and safety codes, construction standards, zoning and land use policies, tax policies, and development standards. The AI should also examine the placement of public housing as well as its access to government services.

A. PUBLIC POLICIES AND SERVICES

Community features, including public services and facilities, are essential parts of good neighborhoods, leading to a more desirable community and more demand for housing in these areas. Lack of such healthy neighborhood elements can indicate public sector impediments to fair housing choice when these shortcomings occur more in neighborhoods with high concentrations of protected class populations. Often these are low- and moderate-income areas, where the quality and availability of public services can also have significant effects on housing choice.

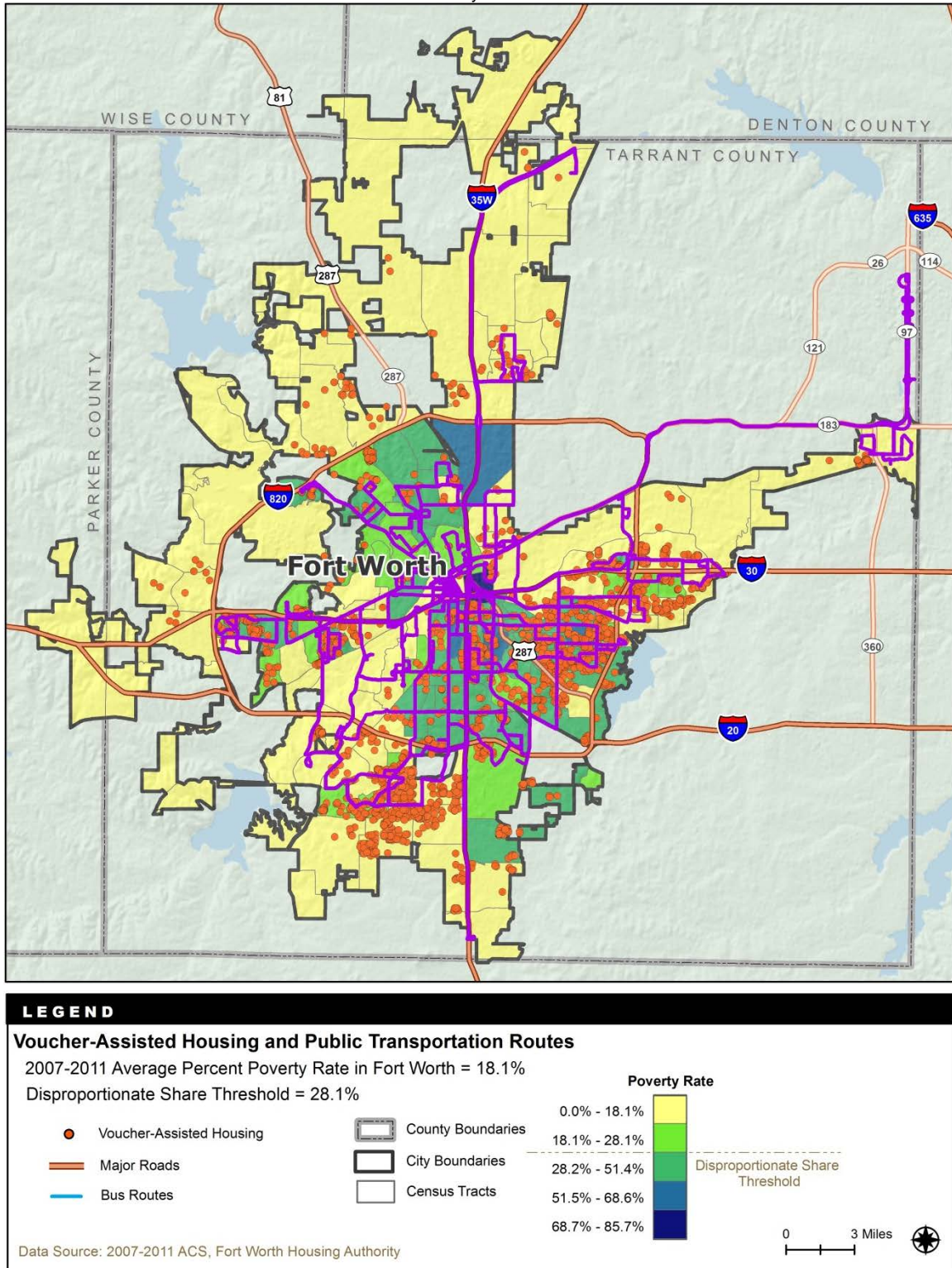
In particular, services and programs to improve living conditions are important in areas of poverty and low incomes, where minority race and ethnicity persons, families with children, and persons with disabilities tend to be highly concentrated. Thus, efforts to improve housing choice in these areas should not be limited to housing options but should consider the availability of services such as public transit, health care, and employment resources. For such services in particular, inter-jurisdictional coordination is essential to connect the region and lessen neighborhood concentrations of need.

ASSISTED HOUSING AND TRANSIT LOCATIONS

Public or assisted housing can exist in several forms, including low-income housing projects, housing voucher programs, and supportive housing. The objective of public and other forms of assisted housing is to provide housing that is suitable for persons with special needs or families of low- to moderate-income levels and to promote access to jobs, transportation, and services. The geographic distribution of such services can indicate the existence of an impediment to fair housing choice, if these services are lacking in areas with high populations of protected class persons. Uneven distribution of public and assisted housing can also be the result of an impediment such as land use policies that discourage multi-family or low-income housing in some areas, thus leading to segregation of low-income and other populations.

Map VI.1, on the following page, shows the location of housing vouchers used in Fort Worth, along with the concentration of poverty across the City. It also shows the relationship between housing vouchers and public transportation routes in the City; public transit availability can help measure the accessibility of housing and other services for low-income residents.

Map VI.1
Housing Vouchers and Public Transit Routes
 City of Fort Worth
 2011 ACS and City of Fort Worth Data



Parts of the City with poverty rates above the disproportionate share threshold were generally well-served by public transportation. Routes in larger census tracts were served by comparatively few bus routes; notably, the large tract near to the south of the interchange of I-35W and the I-820 loop.⁶⁹ A majority of housing units funded in whole or in part by HUD housing vouchers were located in areas that were served by public transportation. However, several areas with a high concentration of housing vouchers were beyond the orbit of public transit in Fort Worth, including Hulen Heights, Hulen Springs Meadow, and Stone Meadow, along with some of the peripheral tracts to the west and northwest of town.

It is also noteworthy that voucher assisted housing, while distributed to some degree throughout the entire city, is less prevalent in areas of town with low rates of poverty than in areas with high poverty rates. Additionally, comparison of this map with the map detailing home values in the Fort Worth areas reveal that voucher-assisted housing was largely absent from many tracts with the highest median home values, notably in the southwestern area inside the beltway and in peripheral census tracts. On the other hand, the Hulen Heights, Hulen Springs Meadow, and Stone Meadow neighborhoods have both high concentrations of voucher assisted housing and higher property values than the citywide median.

Map VI.2, on the following page, shows multi-family housing properties funded by HUD rental assistance and their relation to areas of poverty.⁷⁰ These units were largely located in areas with moderate to low levels of poverty, and were typically located on one of the City's bus routes.

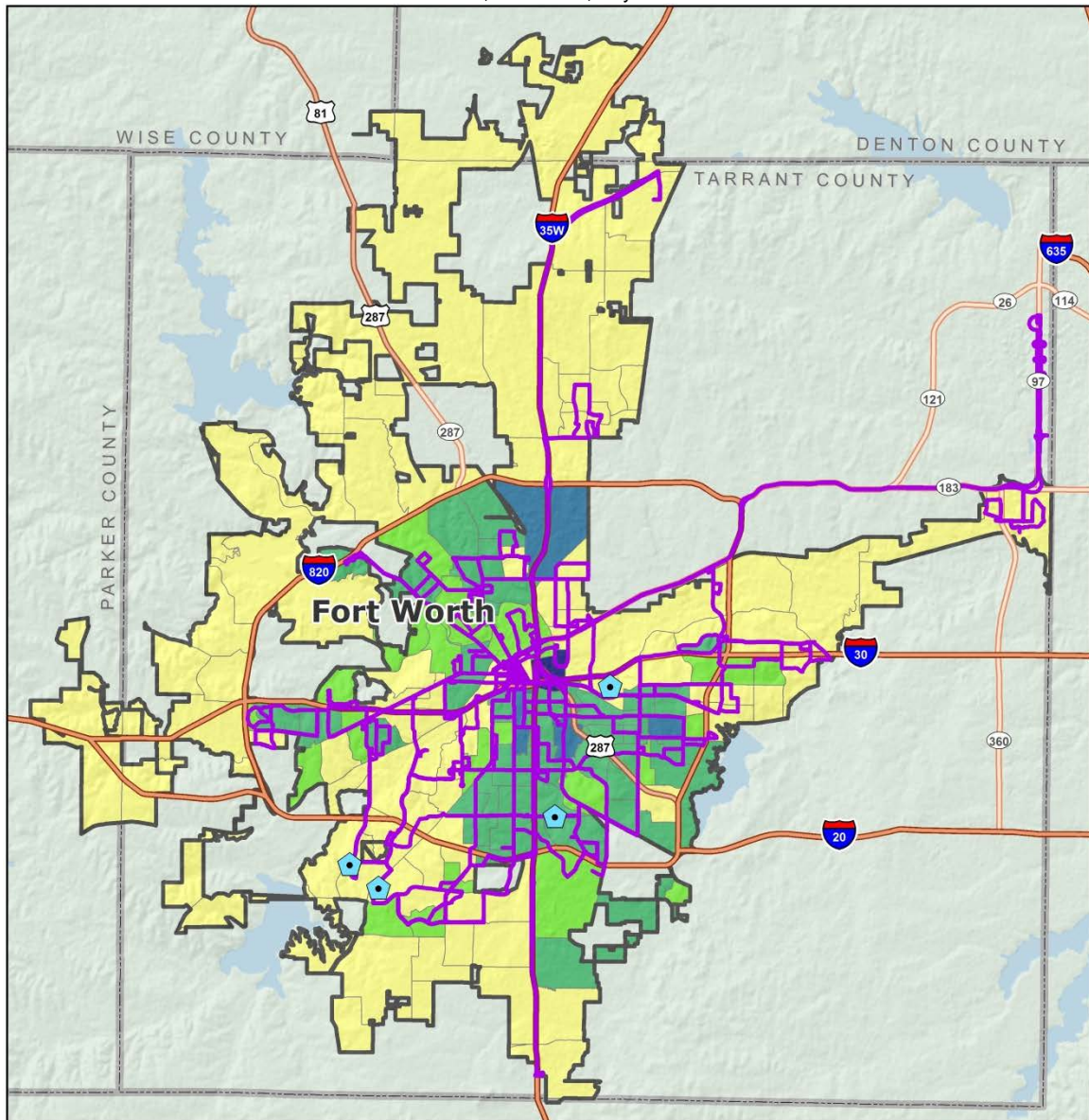
B. FAIR HOUSING SURVEY – PUBLIC SECTOR RESULTS

As mentioned previously, further evaluation of the status of fair housing in Fort Worth was conducted via an online 2013 Fair Housing Survey, which was completed by 504 stakeholders and citizens. Those solicited for participation included a variety of individuals from the fair housing arena. Most questions in the survey required “yes,” “no,” or “don't know” responses, and many allowed the respondent to offer written comments. While the numerical tallies of results are presented in this section, along with summaries of some comment-heavy questions, a complete list of written responses is available in Appendix H. Other survey results are also discussed in **Sections V** and **VII**.

⁶⁹ It should be noted that in some cases the portions of the large census tracts that are not served by public transportation are areas without significant housing.

⁷⁰ HUD Multifamily Assistance and Section 8 Contracts database, January 2012, http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/exp/mfhdiscl

Map VI.2
Multi-Family HUD-Assisted Rental Units and Public Transit Routes
 City of Fort Worth
 2013 HUD Data, 2011 ACS, City of Fort Worth



LEGEND

2013 Multi-Family Assisted Housing and Public Transportation Routes

2007 - 2011 Poverty Rate in Fort Worth = 18.1%
 Disproportionate Share Threshold = 28.1%

HUD Assisted Multifamily Property	Census Tracts	<p>Poverty Rate</p> <p>0.0% - 18.1%</p> <p>18.1% - 28.1%</p> <p>28.2% - 51.4%</p> <p>51.5% - 68.6%</p> <p>68.7% - 85.7%</p> <p>Disproportionate Share Threshold</p>
Major Roads	County Boundaries	
Bus Routes	City Boundaries	

Data Source: 2007-2011 ACS, July 2013 HUD FHA Office Of Multifamily Housing Programs

0 3 Miles

FAIR HOUSING IN THE PUBLIC SECTOR

Public sector effects on housing can be complex and varied. The questions in this section of the survey asked respondents to think about possible barriers to fair housing choice within very specific areas of the public sector, as follows:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies,
- Access to government services, and
- Any other public administrative actions or regulations.

If respondents indicated affirmatively that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented in Table VI.1, below. Narrative responses and practices noted by high numbers of respondents suggest that the issues raised are potential impediments to fair housing choice in parts of the City.

Table VI.1
Barriers to Fair Housing in the Public Sector
City of Fort Worth
2013 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	42	163	103	196	504
Zoning laws?	39	151	118	196	504
Occupancy standards or health and safety codes?	37	142	127	198	504
Property tax policies?	17	146	145	196	504
Permitting process?	10	150	147	197	504
Housing construction standards?	13	150	142	199	504
Neighborhood or community development policies?	36	151	116	201	504
Limited access to government services, such as employment services?	79	136	91	198	504
Public administrative actions or regulations?	18	140	149	197	504

Land Use Policies

Forty-two respondents, or about 13 percent of those who answered this question, noted that they were aware of barriers to fair housing choice related to land use policies. Respondents who provided additional comments to these responses discussed several potential barriers to fair housing choice, but the focus of commenters' concerns was the concentration of affordable housing in low income communities, particularly in east Fort Worth, and often as a result of neighborhood opposition to such housing in more affluent areas. One should note in passing that fair housing laws applicable to Fort Worth do not extend protected class status based on income, or source of income. However, the concentration of affordable units may produce barriers to fair housing choice where it disproportionately impacts individuals in protected classes.

Zoning Laws

Thirty-nine respondents stated that they were aware of barriers to fair housing choice in zoning laws, though 38.9 percent did not respond. Nearly 90 percent of those who did respond to the question either were not aware of, or did not know about, such barriers. Respondents who provided commentary on their answers to this question again perceived that neighborhood opposition (NIMBYism) impacted zoning decisions and limited fair housing choice. Following the question prompt, several commenters cited limitations on the placement of group homes as a specific example of neighborhood opposition exerting its influence through zoning laws.

Occupancy Standards or Health and Safety Codes

Just over 12 percent of those who responded to this question claimed to be aware of any practices that constituted barriers to fair housing choice in occupancy standards or health and safety codes. Lax and uneven enforcement of health and safety codes was perceived to be an issue, particularly in low-income and minority communities. The most prominent theme in this section, however, was overcrowding due to inadequate enforcement of occupancy standards in low-income, minority, and especially immigrant communities.

Property Assessment and Tax Policies

When asked about barriers to fair housing choice in property tax policies, only seventeen respondents were aware of such issues, and close to 95 percent did not know or were not aware of such problems. Those who provided additional commentary on this question cited a lack of tax incentives to improve accessibility, or to locate businesses or housing developments in the eastside of town.

Permitting Processes

Nearly 97 percent of respondents to this question did not know about barriers to fair housing choice in the permitting process, or were not aware of any. Very few (10) respondents claimed to be aware of any such barriers, and commentary on this point was correspondingly sparse. Some respondents stated that—to their knowledge—documents and forms were generally unavailable in languages other than English, and a few of the commenters contended that documents should not be available in other languages. A couple of commenters expressed the need for a simplified permitting process, while one commenter cited a lack of financial literacy as a potential barrier to fair housing choice.

Housing Construction Standards

As was the case in the previous question, very few respondents indicated an awareness of barriers to fair housing choice in home construction standards; of the 305 who responded to this question, only 13 claimed to know of any such barriers. Comments submitted with this question focused on the accessibility requirements, which were seen as confusing, and the expense of strict and changing code requirements, which were cited as stifling development in historically disadvantaged communities.

Neighborhood or Community Development Policies

Thirty six respondents claimed to have noted barriers to fair housing choice in neighborhood or community development policies—nearly 12 percent of those who answered this question. A common theme among commenters was a lack of community development policies that focused on areas in the east of town, and neighborhood development policies that bar affordable housing in affluent, white areas of town. Additionally, disadvantaged areas such as the Como neighborhood were cited as areas in which the city was slow to put in lights or demolish dilapidated buildings.

Limited Access to Government Services

Seventy-nine respondents, which is over a quarter of those who answered this question, stated that they were aware of limited access to government services, and commenters overwhelmingly cited a lack of public transit options as a potential barrier to fair housing choice. Inadequate public transit was considered to be particularly limiting in low income areas, and respondents felt that the current network failed to connect individuals who rely on public transit to employment opportunities around Fort Worth. Respondents also highlighted the limited office hours and locations of government service providers as a potential barrier to fair housing choice.

Any Other Public Administrative Actions or Regulations

Comparatively few respondents signaled an awareness of barriers to fair housing choice in public administrative actions or regulation other than those discussed above. Comments submitted by the 18 respondents who did claim to be aware of such barriers discussed a range of issues including a need for broader policy shifts to encourage employment and job growth, the challenges in the housing market for residents with a criminal background, and a lack of investment in the Stop Six neighborhood. A few commenters took this last question as an opportunity to underscore some of the issues discussed previously, including inadequate code enforcement and restrictive zoning ordinances.

SUMMARY

The status of affirmatively furthering fair housing within the public sector of Fort Worth was evaluated through review of the placement of several types of assisted housing in the City, the relationship between the location of public transit and assisted housing, and the results of the public sector section of the 2013 Fair Housing Survey.

Evaluation of the distribution of housing vouchers demonstrated a trend toward higher concentrations of voucher-assisted housing in areas of town with relatively high poverty rates and relatively low property values. In general, these units were less common to the west of Interstate 35W (with the exception of a large concentration to the south of Interstate 20). The same was true of multi-family assisted homes, which were absent from the west-northwest of town—the area bounded by Interstate 20 to the south and Interstate 35W to the east. Public assisted housing units were generally located on or near transit routes; exceptions included voucher assisted housing in Hulen Heights, Hulen Springs Meadow, and Stone Meadow, as well as some of the large peripheral tracts.

Results from the public sector section of the 2013 Fair Housing Survey revealed that some respondents believe there are problematic practices or policies within the public sector. Some respondents noted policies and code enforcement practices that allow for substandard housing conditions, particularly impacting protected class populations and areas in which those populations tend to be concentrated. Among such respondents, overcrowding was an especially salient issue. Much of the commentary focused on restrictive zoning as a potential source of barriers to fair housing choice, with some residents maintaining that zoning decisions were an avenue by which neighborhood opposition to fair housing efforts could succeed in limiting the placement of such housing. Among respondents, the most commonly cited basis for discrimination in housing choice was race, though a number of respondents also claimed to be aware of instances of discrimination on the basis of disability, national origin, and sex.

C. COMMUNITY DEVELOPMENT COUNCIL HEARING MINUTES

The findings of the 2013 Analysis of Impediments to Fair Housing choice for the City of Fort Worth were presented to the Community Development Council (CDC) on December 11, 2013. Included in the presentation was a discussion of the major findings presented in this report, including data on demographic and economic trends, trends in home purchase lending, fair housing complaints, and the results of the 2013 Fair Housing Survey. In addition, the presentation included a discussion of the impediments that were identified during the AI process. Council members and the public were then provided with an opportunity to comment on the findings.

In the comment session following the presentation, the public sector impediments were identified as the class of impediments that fell most directly under the purview of the CDC, and the characteristics of these impediments were discussed in further detail along with the potential role that public sector actors (including the CDC) may play in addressing them. Of particular interest to discussants were the second public sector impediment identified⁷¹ and the next steps in the AI process and consideration of the action items suggested in the AI document.

⁷¹ The second impediment identified was “Overconcentration of vouchers, assisted housing, and lower-income housing in selected areas of the City.” See list of impediments and suggested actions in the Executive Summary and in Section IX below.

SECTION VII. PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in Fort Worth as gathered from various public involvement efforts conducted as part of the AI process. Public involvement feedback is a valuable source of qualitative data about impediments, but, as with any data source, citizen comments alone do not necessarily indicate the existence of citywide impediments to fair housing choice. However, survey and forum comments that support findings from other parts of the analysis can more solidly identify impediments to fair housing choice.

A. FAIR HOUSING SURVEY

As discussed in previous sections, a 2013 Fair Housing Survey comprised a large portion of the public involvement efforts associated with the development of the 2012 AI. While data from the survey regarding policies and practices within the private and public sectors have already been discussed, the remaining survey findings are presented in the narrative below.

The purpose of the 2013 Fair Housing Survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many organizations and individuals throughout the City were solicited to participate.

A total of 504 persons in the City of Fort Worth completed the survey, which was conducted entirely online. Individuals solicited for participation included representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, neighborhood associations, banking entities, fair housing advocates, and other groups involved in the fair housing arena. An identical version of the survey was also offered in Spanish, but no Spanish responses were received. A complete list of comments to the survey is included in the Appendices. Other survey results are also discussed in **Sections V and VI**. Narrative responses and practices noted by high numbers of respondents suggest that the issues raised are impediments to fair housing choice.

Table VII.1
Role of Respondent
City of Fort Worth
2013 Fair Housing Survey Data

Primary Role	Total
Advocate/Service Provider	20
Appraisal	1
Banking/Finance	13
Construction/Development	9
Homeowner	267
Insurance	4
Law/Legal Services	4
Local Government	18
Property Management	11
Real Estate	27
Renter/Tenant	61
Service Provider	30
Other Role	36
Missing	3
Total	504

Respondents of the 2013 Fair Housing Survey were asked to identify their primary role within the housing industry. As shown in Table VII.1 above 50 respondents identified themselves as advocates or service providers, while 267 respondents were homeowners, 61 were tenants of rental housing, 11 were in property management, and 18 were representatives of local government.

The next question asked respondents about their familiarity with fair housing laws. Results of this question are presented below in Table VII.2. As shown, 260 respondents (51.6 percent), indicated that they were somewhat familiar or very familiar with fair housing law, and 120 (23.8 percent) said that they were unfamiliar.

Table VII.2
How Familiar are you with
Fair Housing Laws?
 City of Fort Worth
 2013 Fair Housing Survey Data

Familiarity	Total
Not Familiar	120
Somewhat Familiar	186
Very Familiar	74
Missing	124
Total	504

Table VII.3, below, shows the responses to a number of questions regarding federal, state, and local fair housing laws. First, respondents were asked to indicate their perceptions of the usefulness of fair housing laws in their communities. As shown, 276 respondents, or nearly 73 percent of those who answered the question, indicated that fair housing laws are useful, while 35 respondents believed that fair housing laws are not useful.

Respondents were also asked if fair housing laws are difficult to understand or follow. As shown, 107 respondents said that fair housing laws are difficult to understand or follow, which represents over a quarter of respondents who answered this question and suggests that additional education and outreach about fair housing law may be necessary.

The third question of this section inquired if fair housing laws should be changed. Less than 20 percent of those who answered this question, or 70 respondents, indicated that fair housing laws should be changed, and written suggestions included:

- Increasing enforcement of existing law,
- Inclusion of sexual orientation as a protected class⁷², and
- Requiring additional protection or housing options for persons with developmental and physical disabilities.

One should note in passing that some commenters who responded to this question were not supportive of fair housing efforts, either as conceived or as implemented. Such respondents felt that fair housing laws were overbearing, were no longer necessary, and that they represented unwarranted government intrusion into the housing market. However, the need for better enforcement expressed in this comment section is further reflected in responses to Question 6 of the survey, which asked whether or not respondents felt that fair housing laws are adequately enforced: 58.9 percent responded “No” to this question.

⁷² As noted above, sexual orientation is not a protected class at the federal or state level. It is, however, a protected class in Fort Worth.

Table VII.3
Federal, State, and Local Fair Housing Laws

City of Fort Worth
 2013 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	276	35	69	124	504
Are fair housing laws difficult to understand or follow?	107	142	127	128	504
Do you think fair housing laws should be changed?	70	120	180	134	504
Do you think fair housing laws are adequately enforced?	97	211	50	146	504

The next section in the survey related to fair housing activities, including outreach and education and testing and enforcement. As shown on the following page in Table VII.4, when asked if there was a training process available to learn about fair housing laws, 97 respondents responded affirmatively while 211 (58.9 percent of those who answered this question) reported that there was no such training available. 55 respondents noted that they had participated in this training, or about 11 percent of total respondents to the survey. Respondents were also asked about their awareness of fair housing testing; of those who responded to this question, 243 respondents (67.9 percent) reported that they were unaware of any such testing.

Questions in this section also invited respondents to gauge the current levels of fair housing activities in their communities. A majority of respondents either did not answer this question or reported that they did not know about current levels of fair housing activities. Of those who did express an opinion on the level of outreach and education activity, 60 percent, or 98 respondents, felt that there was too little outreach and education. 47 respondents felt that the current level of outreach and education was appropriate, while 18 felt that it was excessive. Responding to the question concerning the level of fair housing testing, 278 respondents did not know enough about testing to render an opinion. Of those who did express their opinion on the question, 39 felt there was too little testing, 25 felt the current level of testing was appropriate, and 17 felt that it was excessive.

Table VII.4
Fair Housing Activities

City of Fort Worth
 2013 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total	
Is there a training process available to learn about fair housing laws?	97	211	50	146	504	
Have you participated in fair housing training?	55	88	21	340	504	
Are you aware of any fair housing testing?	37	243	78	146	504	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	98	47	18	197	144	504
Is there sufficient testing?	39	25	17	278	145	504

As part of the process of measuring understanding of fair housing law through the survey instrument, respondents were asked to list their awareness of classes of persons protected by fair housing laws on federal, state, and local levels. Race and disability were offered as examples of protected classes in the question narrative, encouraging respondents to list other protected classes. Results of this question are presented below in Table VII.5. Some respondents were able to correctly identify several of the protected classes, including religion, gender, sexual orientation, familial status, and national origin. Between 27.6 and 16.1 percent

of respondents, in descending order, identified these groups. However, many responses revealed a common impression that the list of protected classes is more extensive than it truly is. For example, a sizeable minority (17.3 percent) listed “Age”—which is not protected under federal, state, or local housing law— as a protected class. Additional “protected classes” listed by survey respondents include income, military status, and criminal history, none of which are protected by fair housing laws applicable to Fort Worth. In addition, research presented in the literature review section of this document suggests that, nationally, many persons are not able to correctly list classes of persons protected by fair housing law in their community; this generalization may be accurate in Fort Worth as well.

Table VII.6, below, presents tallied responses to survey questions related to the status of fair housing in the City of Fort Worth. First, respondents were asked if they were aware of a fair housing plan in their communities. Over 41 percent of respondents elected not to respond to this question; of those who did respond, approximately 79 percent responded that they were not aware of such a plan or that they did not know enough to respond. Only 22 percent of respondents were aware of a city fair housing ordinance, regulation, or plan.

Table VII.5
Protected Classes

City of Fort Worth
2013 Fair Housing Survey Data

Protected Class	Total
Age	87
Ancestry	2
Color	37
Disability	15
Ethnicity	14
Family Status	83
Gender	116
Income	31
Military	14
National Origin	81
Race	1
Religion	139
Sexual Orientation	109
Criminal History	7
Other	85
Total	853

Table VII.6
Local Fair Housing

City of Fort Worth
2013 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any city or county fair housing ordinance, regulation, or plan?	65	141	89	209	504
Are there any specific geographic areas that have fair housing problems?	53	72	165	214	504

Respondents were also asked to offer information regarding any specific geographic areas within the City that might have increased fair housing issues. Three quarters of respondents elected not to answer the question or indicated that they did not know, and 72 responded that they were not aware of any problem areas in Fort Worth. However, 53 respondents—18.3 percent of those who answered the question—noted that certain geographic areas of the City had fair housing issues. Written comments focused on the eastern and southern parts of town, describing these areas as being especially burdened by homelessness, health and safety issues, and other problems associated with low-income areas. Several respondents singled out the Stop Six neighborhood especially prone to suffer from fair housing problems.

Respondents were also asked to offer any additional comments that they might have regarding fair housing in their communities. Many respondents reported that they were not very familiar with fair housing laws and that outreach and education would be beneficial. Additionally, several comments relating to fair housing issues were noted:

- ✓ A need to better serve areas with high rates of minority residence and poverty,

- ✓ Need for more affordable housing opportunities in areas with a large number of new jobs, and
- ✓ A need for demolition and renovation of worn-down units throughout the city.

Once again, it must be noted that many of the respondents to this question expressed disapproval of fair housing efforts in general. Some of these respondents cited a perceived actual or potential negative impact of fair housing efforts on their neighborhoods, communities, and property values.

Any one of the responses presented in the previous pages *on their own* may not necessarily be considered an impediment to fair housing choice, but the high number of “don’t know” or missing responses may be due to a lack of fair housing knowledge among public sector stakeholders. This is more likely an indicator that fair housing outreach and education efforts were insufficient or ineffective, which could represent a persistent impediment to fair housing choice.

B. FAIR HOUSING FORUMS

Public input opportunities, termed Fair Housing Forums, were held before the Human Relations Commission and the Community Development Commission in September of 2014. The purpose of the forums was to allow the public the chance to learn more about the AI process, including why the AI was conducted, as well as view the preliminary findings. Public involvement was also solicited at the forums, and comments were collected from the attendees.

Guests at the forums included housing advocates, representatives of local service agencies, real estate agents, property owners, and others. Discussions and comments at the forums focused on several issues, largely relating to the rental markets. The following were some of the recurring themes in these discussions:

- ✓ Transportation: Inadequate public transit options were seen to limit fair housing choice where they did not serve areas in which protected class individuals lived, as well as when they failed to connect low-income neighborhoods to areas of opportunity.
- ✓ Neighborhood opposition was noted as a barrier to the placement of affordable and public-assisted housing units, as well as to the placement and expansion of bus routes and stops in higher-income areas.
- ✓ A need for more education was cited frequently in the homeowner focus group as a way to:
 - Improve understanding of personal credit among first-time home buyers and those who may be targeted by predatory loans,
 - Foster community-mindedness among housing market professionals, and
 - Improve awareness of housing assistance programs among home sellers.
- ✓ The renter focus group also saw education as a means to teach renters about the rights they have and to empower renters to assert those rights when faced with abusive landlords.

SUMMARY

Public involvement opportunities were an integral part of the development of this AI. Activities included the 2013 Fair Housing Survey to evaluate current fair housing efforts and the two

public forums in which citizens were offered the chance to comment on initial findings of the AI and offer feedback on prospective impediments.

Results of the 2013 Fair Housing Survey showed that the majority of respondents felt that fair housing laws are useful, whereas some respondents were not familiar with fair housing law. A minority of respondents were able to correctly identify some of the groups protected by fair housing law applicable to Fort Worth, though some included categories, such as age, that are not protected under federal, state, or local fair housing statutes. Many respondents were not aware of appropriate venues to which to refer a victim of housing discrimination. Of the respondents who answered the question, many felt that current levels of fair housing education and outreach activities were not sufficient, and a moderate need was indicated for increased fair housing testing activities. A majority of respondents maintained that fair housing laws are not adequately enforced.

SECTION VIII. SUMMARY OF FINDINGS

Complaint data and AI public involvement feedback further help define problems and possible impediments to housing choice for persons of protected classes, and confirm suspected findings from the contextual and supporting data. Combined, these diverse sets of data provide for an analysis identifying impediments to fair housing choice for Fort Worth residents.

Socio-Economic Context

Analysis of demographic, economic, and housing data provided background context for the environments in which housing choices are made. Demographic data indicated the sizes of populations and protected classes; economic and employment data showed economic factors; and counts of housing by type, tenure, quality, and cost indicated the ability of the housing stock to meet the needs of the City's residents.

According to the Census Bureau, between 2000 and 2010, the population in Fort Worth grew from 534,694 to 741,206 persons, or by 38.6 percent. At the end of the decade, young persons represented a larger share of the population than they had in 2000; as did late-middle age persons. Among racial groups, the highest rate of growth was seen in the Asian population, while the black population represented a smaller share of the total population in Fort Worth at the end of the decade than it had in 2000. By 2010, the white population continued to be the largest racial group in Fort Worth, and represented a slightly larger share of the population than it had at the beginning of the decade. In terms of ethnicity, the share of Hispanic residents increased at a rate that was nearly double the rate of non-Hispanic residents, entailing a shift toward greater representation of Hispanic residents in the City over the decade. Geographic analysis of the distribution of racial groups in the Fort Worth area reveals the persistence of high concentrations of different racial groups in different parts of town: both decennial Censuses revealed that the black population tended to be concentrated in the southeast and in Como, the Hispanic population in the northwest and south, and the white population in the periphery and southwestern areas within the beltway.

Economic data for Fort Worth demonstrate the impact of the recent recession on wages, though the impact on employment was muted compared to national figures. The size of the labor force increased steadily through the middle and end of the last decade, while growth in the number of employed fell slightly after 2008. The result was an increase in the unemployment rate, though because there was no reduction in the number of employed, unemployment in Fort Worth was less severe at its peak in 2010 than it was across the country that same year. By contrast, real average earnings per job in Fort Worth fell dramatically after 2008; prior to this year, the City had been experiencing a moderate decline in real wages per job that began in 2004. Real per capita income also fell sharply in 2009 after steady growth through the middle and late 2000s. Both wages and income have been on the rebound since 2010. The poverty rate in the city increased between 2000 and 2011, from 15.9 percent in 2000 to an average of 18.1 percent between 2007 and 2011. Areas with high rates of poverty tended to be concentrated inside the beltway, though less so in the five years up to 2011 than in 2000. The most severe poverty during this time tended to be concentrated in the east and southeast.

The number of housing units in the City increased by 37.9 percent between 2000 and 2010, and the share of total housing stock represented by single-family units increased after 2000. The number of vacant houses increased markedly after 2000, outstripping growth in the number of occupied housing units; as a result, the share of housing units that were vacant increased by over 2 percent during the decade. Among occupied units, the 2010 Census registered a shift toward owner-occupied housing units. Of potential concern is the rapid growth in the number of vacant units that are not on the market—the “other vacant” units. These units were particularly concentrated in the Como, the southeast, and south of Fort Worth (as well as in one large northern census tract), making blight a concern in those areas. On the other hand, overcrowding and severe overcrowding were less prevalent in the five years leading up to 2011 than they had been in 2000, in spite of the marked shift toward larger households over the decade. Incomplete bathroom facilities were also less of a problem late in the decade, though the share of households with incomplete kitchen facilities increased slightly after 2000.

Cost-burdens and severe cost-burdens increased after 2000 for homeowners and renters alike, though this increase fell more heavily on renters. Average rental costs increased moderately from 2000 to 2010, and were highest in peripheral census tracts, downtown, and the area to the south-southwest of downtown. The median home value of owner-occupied homes increased dramatically over that period, with the highest-value homes concentrated in the west, and especially the southwest of town.

Review of Fair Housing Laws, Studies, and Cases

A review of laws, studies, cases, and related materials relevant to fair housing in Fort Worth demonstrated the complexity of the fair housing landscape. While the Texas Fair Housing Act extends protected class protections to only those groups enumerated in the federal Fair Housing Act, Fort Worth City Code extends additional protections based on sexual orientation, transgender, gender identity, and gender expression. In spite of the protections afforded to Fort Worth residents, a 2011 report by the North Texas Fair Housing Center suggested that unlawful discrimination persists in the city. Review of local cases highlights an instance in which the scope of the FHA—as interpreted in national cases—was limited by state insurance regulation, as well as the role that neighborhood opposition plays in obstructing fair housing efforts.

Fair Housing Structure

A review of the fair housing profile in Fort Worth revealed that several organizations provide fair housing services, including outreach and education, complaint intake, and testing and enforcement activities for both providers and consumers of housing. These organizations include HUD, the Fort Worth Human Relations Commission, and the North Texas Fair Housing Center.

Fair Housing in the Private Sector

Evaluation of the private housing sector included review of home mortgage loan application information, as well as mortgage lending practices, fair housing complaint data, and results from the private sector section of the 2013 Fair Housing Survey.

Home Mortgage Disclosure Act (HMDA) data were used to analyze differences in home mortgage application denial rates in Fort Worth by race, ethnicity, sex, income, and Census tract. Evaluation of home purchase loan applications from 2004 through 2011 showed an average loan denial rate of 18 percent over that period. Denial rates generally declined after 2004, though there was a brief spike in denials in 2010. American Indian, black, and Hispanic applicants experienced higher rates of loan denials than white or Asian applicants, even after correcting for income in most cases.

Analysis of originated loans with high annual percentage rates showed that black and Hispanic populations were particularly prone to receiving these types of lower-quality loan products. Hispanic borrowers experienced a rate more than ten percentage points higher than that of white borrowers, while black borrowers were issued HALs at more than double the rate at which they were issued to white borrowers. With high proportions of low-quality, high-annual percentage rate loans being issued to these particular groups, the burden of foreclosure may fall more heavily upon them. Additionally, high interest rates on loans may serve as an obstacle to housing choice when they are disproportionately issued to members of particular racial or ethnic groups who are looking for homes outside of areas in which those groups have traditionally been concentrated.

Analysis of data from the Community Reinvestment Act (CRA), which is intended to encourage investment in low- and moderate-income areas, showed that lending tended to target moderate- to high-income areas. Most lending, as measured by both the number and the combined value of loans, was directed toward the city center. On the other hand, very little lending was directed toward the southeast, by either measure.

Fair housing complaint data was requested from HUD and the Human Relations Commission. HUD data showed that 1,853 fair housing-related complaints were filed in the City from 2004 through October 2013. The protected classes most impacted by discrimination, based on successfully conciliated complaints, were disability, race, and national origin, and the most common complaint issues related to:

- Discriminatory terms, conditions, privileges, or services and facilities;
- Discriminatory terms, conditions, or privileges relating to rental; and
- Failure to make reasonable accommodation.

Findings based on complaint data from HRC largely reinforced these findings.

Results from the private sector portion of the 2013 Fair Housing Survey, conducted from July through October as part of the AI process, showed that some respondents saw possible issues of housing discrimination in Fort Worth's private housing sector. Issues described by respondents regarding the rental markets suggested the presence of discrimination based on race and ethnicity, while discrimination based on sex and family status was perceived to occur in the real estate, mortgage, and home lending industries. Discrimination based on income was widely cited, but source of income is not protected by fair housing law in Fort Worth.

Fair Housing in the Public Sector

The status of affirmatively furthering fair housing within Fort Worth's public sector was evaluated through review of the placement of several types of assisted housing in the City, the relationship between the location of public transit and assisted housing, and the results of the public sector section of the 2013 Fair Housing Survey.

Evaluation of the distribution of housing vouchers and HUD-assisted rental properties in the City demonstrated that these public-assisted units tended to be concentrated in areas in the south and southeast. Many of the voucher- and HUD-assisted developments were served by public transit, but there were some areas with high concentrations of housing vouchers that were not served by city bus routes, notably in southern and peripheral census tracts.

Results from the public sector section of the 2013 Fair Housing Survey revealed that some respondents in Fort Worth believe there are problematic practices or policies within the public sector. Inadequate code enforcement, particularly as relates to overcrowding, was perceived to disproportionately impact low-income and minority areas. Restrictive zoning policies and decisions were also seen as potential barriers to fair housing choice, particularly when they are perceived to be motivated by neighborhood opposition to fair and affordable housing. Among survey respondents, discrimination in the public sector was seen to be most strongly connected to race.

The results of this Analysis of Impediments were presented to the Community Development Council (CDC) on December 11, 2013. The commentary session following this presentation clarified several points of the analysis and focused on the role of the CDC in addressing public sector impediments. Of particular interest to discussants were the second public sector impediment identified—which concerned the overconcentration of affordable units in certain areas of the city—and the next steps in the AI process and consideration of the action items suggested in the AI document.

Public Involvement

Public involvement opportunities were an integral part of the development of this AI. Activities included the 2013 Fair Housing Survey to evaluate current fair housing efforts, three focus groups of housing industry experts, and the two public forums wherein citizens were offered the chance to comment on initial findings of the AI and offer feedback on prospective impediments.

Results of the 2013 Fair Housing Survey showed that the majority of respondents felt that fair housing laws are useful, though many respondents were not familiar with fair housing law. A few respondents showed familiarity with the classes of persons protected by fair housing law in the City, though there was a common misperception that age is a protected class in Fort Worth. Many respondents were not aware of appropriate venues to which to refer a victim of housing discrimination. Many respondents noted the need for increased fair housing education and outreach activities, and some felt there was a need for increased fair housing testing activities. A majority of respondents felt that fair housing laws are not adequately enforced in Fort Worth.

The focus groups were held in August, with additional public presentations occurring in December before the Community Development Council and the City Council in January of 2014. These opportunities allowed citizens, agencies, and the Community Development Council to voice concerns about barriers to fair housing choice. Comments received at these forums focused on the need for better education to homebuyers, home sellers, housing market professionals, and renters, as well as the need for improvements to public transportation in the city.

SECTION IX. IMPEDIMENTS AND SUGGESTED ACTIONS

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. In exchange for receiving federal funds from HUD, the City of Fort Worth certifies that will continue to affirmatively furthering fair housing. The requirements of such certification comprise the following elements:

1. Conduct an Analysis of Impediments to Fair Housing Choice,
2. Take actions to remedy impediments if impediments are identified, and
3. Maintain records of the analysis and actions taken.

This report, which represents the first element in the certification process noted above, has resulted in the finding of several impediments to fair housing choice. HUD defines impediments to fair housing choice, reprinted here from the *Fair Housing Planning Guide*, page 2-8, as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.⁷³

While several issues within the housing market were uncovered in the process of conducting this AI, only issues that qualify as impediments to fair housing choice were included based on the definition printed immediately above, albeit with the inclusion of the additional classes of persons protected by state law.

The identified impediments are listed on the following pages for both the private and public sectors and are accompanied by specific actions that the City will follow in an attempt to remedy these issues.⁷⁴

A. IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

PRIVATE SECTOR IMPEDIMENTS, ACTIONS, AND MEASURABLE OBJECTIVES

Impediment 1: Discriminatory terms, conditions, privileges, or services and facilities in the rental markets. The existence of this impediment was suggested in the HUD housing complaint data, respondents' answers to the 2013 Fair Housing Survey, and comments received at the focus groups and Fair Housing Forums.

Action 1.1: Enhance testing and enforcement activities and document the outcomes of enforcement actions

⁷³ U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide*. Vol. 1, p. 2-8. http://www.hud.gov/offices/cpd/about/conplan/fairhousingexs/Module5_TopSevenAFFH.pdf

⁷⁴ Specific details regarding funding activities and timelines will be included in the next Annual Action Plan.

Measurable Objective 1.1: Increase number of testing and enforcement activities conducted

Action 1.2: Continue to educate landlords and property management companies about fair housing law

Measurable Objective 1.2: Increase number of outreach and education activities conducted

Action 1.3: Continue to educate housing consumers in fair housing rights

Measurable Objective 1.3: Increase number of outreach and education activities conducted

Impediment 2: Discriminatory patterns in home purchase loan denials. Evidence of this impediment was seen in the HMDA data, which indicated higher denial rates among racial and ethnic minorities, even when correcting for income, as well as higher denial rates for women applicants.

Action 2.1: Educate buyers through credit counseling and home purchase training

Measurable Objective 2.1: Number of outreach and education activities conducted

Impediment 3: Discriminatory patterns in predatory lending. Evidence of this impediment was seen in the HMDA data, which showed higher rates of subprime loans among black, American Indian, and Hispanic applicants. It was also indicated in respondents' answers provided in the 2013 Fair Housing Survey, who felt that racial and ethnic minorities were disproportionately offered subprime loans.

Action 3.1: Educate buyers through credit counseling and home purchase training

Measurable Objective 3.1: Increase number of outreach and education activities conducted

Impediment 4: Failure to make reasonable accommodation or modification. The existence of this impediment was suggested in the review of complaints filed with HUD, from the responses to the 2013 Fair Housing Survey, and through the topics discussed at the Fair Housing Forums, particularly in regard to persons with disabilities. This impediment includes new construction that seems to occur that lacks proper handicapped accessibility.

Action 4.1: Enhance testing and enforcement activities and document the outcomes of enforcement actions

Measurable Objective 4.1: Increase number of testing and enforcement activities conducted

Action 4.2: Educate housing providers about requirements for reasonable accommodation or modification

Measurable Objective 4.2: Increase number of training sessions conducted

Action 4.3: Conduct audit testing on newly constructed residential units

Measurable Objective 4.3: Number of audit tests completed

Action 4.4: Consider appropriate incremental changes in building codes to allow enhanced designed features for accessibility and visitability

Measurable Objective 4.4: Number of changes made

Impediment 5: Missed Fair Housing Training Opportunities. As expressed in the 2013 Fair Housing Survey, a substantive number of persons responding to the survey had not taken advantage of fair housing training opportunities that are available to them

Action 5.1: Conduct outreach to private sector personnel on the advantages of enrolling in training opportunities that are available

Measurable Objective 5.1: The number of entities who were contacted throughout the year.

Measurable Objective 5.2: Suggest ways for both consumers and professions to better take advantage of the Human Rights Commission training opportunities.

PUBLIC SECTOR IMPEDIMENTS, ACTIONS, AND MEASURABLE OBJECTIVES

Impediment 1: Getting permission for reasonable accommodation appears to be too difficult.

As noted in the 2013 Fair Housing Survey, as well as focus groups, it appears to be problematic for the disabled to get permission to reconfigure their dwellings to accommodate their disability.

Action 1.1: Select sample of past ten variance applicants and interview them

Measurable Objective 1.1: Number of applicants interviewed.

Measurable Objective 1.2: Number of hours spent looking for barriers in any applicable variance or permitting process

Action 1.2: Conduct a review to determine precisely where the barriers are located and then take efforts to overcome these barriers

Measurable Objective 1.2: Number of hours spent looking for barriers in the variance process

Action 1.3: Discuss with planning department the findings of the variance barriers and move to change the process

Measurable Objective 1.3: Number of meeting conducted with planning to change any applicable variance or permitting process

Impediment 2: Overconcentration of vouchers, assisted housing, and lower-income housing in selected areas of the City. Geographic maps prepared that show the geographic dispersion of such housing is concentrated in selected areas of the City.

Action 2.1: Add additional criteria to assisted housing location and other investment decisions

Measurable Objective 2.1: Determine the additional criteria, such as concentration of poverty or concentration of racial or ethnic minority, and incorporate this in the decision process by December 31, 2014.

Measurable Objective 2.2: Evaluate the implications of redevelopment and other investments in areas with high rates of poverty and/or higher concentrations of racial and ethnic minorities

Action 2.2: Create certification classes for a small set of voucher holders so that they may qualify for enhanced value vouchers, a voucher that pays slightly higher than other vouchers

Measurable Objective 2.2: Facilitate education of prospective landlords about the qualities of certified holders of Housing Choice Voucher tenants

Action 2.3: Increase voucher use in moderate income neighborhoods

Measurable Objective 2.3: Facilitate education of prospective landlords about the qualities of Housing Choice Voucher.

Action 2.4: Request Council to convene a discussion regarding the lack of substantive connections between low income areas, employment areas, and public transit.

Measurable Objective 2.4: Preparation of request, and if granted, the discussion materials to be presented to the Council.

Impediment 3: The transit system is not well designed for those residing in lower income areas to gain good access to areas with better opportunities. Geographic maps prepared that show that the transit system is not as well designed as it could be to gain access to areas with higher employment opportunities.

Action 3.1: Contact the transit agency and request enhanced service to these lower income areas

Measurable Objective 3.1: The number of times that the transit agency was contacted and the type of response gained.

Impediment 4: Lack of sufficient understanding of fair housing and affirmatively furthering fair housing. This particular impediment addresses different fair housing considerations, the lack of sufficient understanding, but also neighborhood resistance to the development of assisted housing

Action 4.1: Conduct outreach and education to the public for several perspectives related to fair housing.

Measurable Objective 4.1: The number of outreach and education actions taken in regard to the value of having housing available to all income groups in Fort Worth, thereby encouraging neighborhoods to be more willing to accept assisted housing facilities.

Measurable Objective 4.2: Participate in sponsorship or co-sponsorship of public meetings during April of 2014, Fair Housing Month.

Measurable Objective 4.3: Request on a periodic basis fair housing complaint data from the North Texas Fair Housing Council and publish this information to teach others of the Fair Housing Council as well as fair housing activities in the City

Impediment 5: Lack of protections for source of income and age. Input received from the 2013 Fair Housing Survey, as well as during the Fair Housing Forums indicated this condition. The City's HEDD should defer the following to the HRC:

Action 5.1: Discussion of additional protections pertaining to source-of-income and age in City law

Measurable Objective 5.1: The number of contacts made with the HRC about these matters

Action 5.2: Refer to the HRC the fair housing concerns of the public testimony received regarding the lack of homeless shelter space for persons with sexual identity considerations

Measurable Objective 5.2: The number of contacts made with the HRC about these matters

SECTION X. GLOSSARY

Accessible housing: Housing designed to allow easier access for physically disabled or vision impaired persons.

ACS: American Community Survey

AI: Analysis of Impediments to Fair Housing Choice

AMI: Area median income

BEA: Bureau of Economic Analysis

BLS: Bureau of Labor Statistics

CDBG: Community Development Block Grant

Census tract: Census tract boundaries are updated with each decennial census. They are drawn based on population size and ideally represent approximately the same number of persons for each tract.

Consolidated Plan: Consolidated Plan for Housing and Community Development

Cost burden: Occurs when a household has gross housing costs that range from 30.1 to 50 percent of gross household income.

CRA: Community Reinvestment Act

Disability: A lasting physical, mental, or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes him or her from being able to go outside the home alone or to work.

Disproportionate share: Exists when the percentage of a population is 10 percentage points or more above the study area average.

DOJ: U.S. Department of Justice

ESG: Emergency Shelter Grants program

Fannie Mae: Federal National Mortgage Association (FNMA), a government-sponsored enterprise that purchases mortgages from lenders and repackages them as mortgage-backed securities for investors.

Family: A family is a group of two people or more related by birth, marriage, or adoption and residing together.

FFIEC: Federal Financial Institutions Examination Council

FHAP: Fair Housing Assistance Program

FHEO: Fair Housing and Equal Opportunity

FHIP: Fair Housing Initiative Program

Floor area ratio: The ratio of the total floor area of a building to the land on which it is situated, or the limit imposed on such a ratio.

Freddie Mac: Federal Home Loan Mortgage Corporation (FHLMC), a government-sponsored enterprise that purchases mortgages from lenders and repackages them as mortgage-backed securities for investors.

GAO: U.S. General Accounting Office

Gross housing costs: For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and electricity or natural gas energy charges.

HAL: High annual percentage rate (APR) loan, defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.⁷⁵

HMDA: Home Mortgage Disclosure Act

HOME: HOME Investment Partnerships

HOPWA: Housing Opportunities for Persons with AIDS

Household: A household consists of all the people who occupy a housing unit. A house, an apartment or other group of rooms, or a single room, is regarded as a housing unit when it is occupied or intended for occupancy as separate living quarters; that is, when the occupants do not live with any other persons in the structure and there is direct access from the outside or through a common hall.

Housing problems: Overcrowding, incomplete plumbing or kitchen facilities, or cost burdens

HUD: U.S. Department of Housing and Urban Development

Incomplete kitchen facilities: A housing unit is classified as lacking complete kitchen facilities when any of the following are not present: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

Incomplete plumbing facilities: A housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower.

Labor force: The total number of persons working or looking for work

MFI: Median family income

Mixed-use development: The use of a building, set of buildings, or neighborhood for more than one purpose.

MSA: Metropolitan Statistical Area

NIMBYism: "Not in my backyard" mentality among community members, often in protest of affordable or multi-family housing.

Other vacant units: Housing units that are not for sale or rent

Overcrowding: Overcrowding occurs when a housing unit has more than one to 1.5 persons per room.

Poverty: The Census Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. The official poverty thresholds do not vary geographically, but they are updated for inflation using Consumer Price Index (CPI-U). The official poverty definition uses money income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food stamps).

Predatory loans: As defined by the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA), loans are considered predatory based on:

1. If they are HOEPA loans;⁷⁶
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of HALs. For full definition, see **HAL**.

Protected Class: Group of people protected from discrimination and harassment. Fort Worth residents are protected from housing discrimination based on race, sex, religion, familial

⁷⁵ 12 CFR Part 203, http://www.ffiec.gov/hmda/pdf/regc_020702.pdf

⁷⁶ Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. "HMDA Glossary." <http://www.ffiec.gov/hmda/glossary.htm#H>

status, disability, national origin, color, sexual orientation, transgender, gender identity, and gender expression.

Public housing: Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities.

RDA: Redevelopment agency

Severe cost burden: Occurs when gross housing costs represent 50.1 percent or more of gross household income.

Severe overcrowding: Occurs when a housing unit has more than 1.5 persons per room.

Steering: Actions of real estate agents or landlords to discourage a prospective buyer or tenant from seeing or selecting properties in certain areas due to their racial or ethnic composition.

Tenure: The status by which a housing unit is held. A housing unit is "owned" if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. A cooperative or condominium unit is "owned" only if the owner or co-owner lives in it. All other occupied units are classified as "rented," including units rented for cash rent and those occupied without payment of cash rent.

SECTION XI. APPENDICES

A. ADDITIONAL HUD COMPLAINT DATA

Table A.1
Fair Housing Complaints by Issue
 City of Fort Worth
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Discriminatory terms, conditions, privileges, or services and facilities	96	119	115	120	139	126	97	146	118	118	1,180
Discrimination in term, conditions or privileges relating to rental	9	19	33	30	30	55	67	77	88	88	451
Failure to make reasonable accommodation	9	22	21	35	33	33	44	60	34	34	339
Discriminatory refusal to rent	1	8	10	22	27	24	26	45	64	64	286
Discriminatory acts under Section 818 (coercion, etc.)	9	12	21	27	17	47	31	43	31	31	265
Discriminatory financing (includes real estate transactions)	14	40	18	6	14	13		7	4	4	117
Failure to permit reasonable modification		1	2	3	1	2	4	10	9	9	37
Discriminatory refusal to rent and negotiate for rental	2	6	2	3	2	3	2	8	3	3	31
Discrimination in terms, conditions, privileges relating to sale	5	1	1	2	6	7	1	1	1	1	28
Discrimination in services and facilities relating to rental			1			4	6		1	1	13
Steering				1	2	2	2	1	5	5	13
Discriminatory refusal to sell			2		2	6	2				12
Discrimination in the selling of residential real property	5	1				4	1				12
Other discriminatory acts		1	1		7	2					12
Discriminatory refusal to sell and negotiate for sale	1	5			2	2			1	1	11
False denial or representation of availability - rental	1	1	1		4			2	1	1	10
Discriminatory advertising, statements and notices		1	1		1	1	1	1			6
False denial or representation of availability - sale				1		4					6
Discrimination in making of loans	1		3					1			6
Discriminatory refusal to negotiate for rental	1		1		1		1	1			5
Discrimination in the terms or conditions for making loans		1		3							5
Discrimination in services and facilities relating to sale	1			1	1			1	1	1	5
Failure to provide an accessible route into and thru the covered unit	1	1						2			4
Restriction of choices relative to a rental							2		1	1	3
Use of discriminatory indicators				1			2				3
Failure to provide accessible and usable public and common user areas	1	1		1							3
Discriminatory advertisement - rental		1	1								2
False denial or representation of availability	1		1								2
Discrimination in the brokering of residential real property						1			1	1	2
Discrimination in the appraising of residential real property				1							2
Refusing to provide insurance	1	1									2
Otherwise deny or make housing available			1	1							2
Using ordinances to discriminate in zoning and land use	1			1							2
Non-compliance with design and construction requirements (handicap)	1	1									2
Discriminatory refusal to negotiate for sale				1							1
Restriction of choices relative to a sale				1							1
Total Issues	161	243	236	261	289	336	289	406	363	363	2,881
Total Complaints	143	184	176	168	186	203	178	243	214	214	1,853

Table A.2
Fair Housing Complaints Found With Cause by Issue
 City of Fort Worth
 2004–2012 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Discriminatory terms, conditions, privileges, or services and facilities	67	78	62	66	79	72	55	76	96	66	717
Discrimination in term, conditions or privileges relating to rental	4	12	19	11	20	30	33	44	49	29	251
Failure to make reasonable accommodation	8	14	12	16	24	19	27	41	25	25	219
Discriminatory refusal to rent	1	4	1	12	17	14	9	12	35	39	144
Discriminatory acts under Section 818 (coercion, etc.)	2	5	12	15	6	27	11	22	25	11	136
Discriminatory financing (includes real estate transactions)	9	22	7	2	4	7		5	3		59
Failure to permit reasonable modification		1	1	1	1		4	6	7	7	26
Discriminatory refusal to rent and negotiate for rental	1	3			2	2	1	5	1		15
Discrimination in terms, conditions, privileges relating to sale	4		1	1		5	1	1	1		14
Steering					1	2	2		4		9
False denial or representation of availability - rental		1			4			2	1		8
Discrimination in services and facilities relating to rental						3	3			1	7
Discrimination in services and facilities relating to sale	1			1	1			1	1		5
Discrimination in making of loans	1		2					1			4
Discrimination in the selling of residential real property	3						1				4
Discriminatory refusal to sell						2	1				3
Discriminatory refusal to sell and negotiate for sale					1	1			1		3
Other discriminatory acts		1				2					3
Use of discriminatory indicators				1			2				3
Discriminatory refusal to negotiate for rental					1			1			2
Discriminatory advertising, statements and notices					1			1			2
Discrimination in the brokering of residential real property						1			1		2
Failure to provide accessible and usable public and common user areas	1			1							2
Discriminatory advertisement - rental		1									1
False denial or representation of availability	1										1
Otherwise deny or make housing available			1								1
Non-compliance with design and construction requirements (handicap)		1									1
Failure to provide an accessible route into and thru the covered unit		1									1
Total Issues	103	144	118	127	162	187	150	218	250	184	1,643
Total Complaints	95	108	94	82	103	114	93	135	151	98	1,073

B. COMMENTS FROM THE 2013 FAIR HOUSING SURVEY

FEDERAL, STATE, AND LOCAL LAWS

Table B.1
How did you become aware of fair housing laws?

City of Fort Worth
2013 Fair Housing Survey Data

Comments:
18 years of experience in the mortgage industry
4 1/2 decades as a community activist--South Fort Worth
Academic study.
Acorn
Advertising. Documents signed when I bought my house.
Advocating for a student
Am a Realtor
Apartment Association of Tarrant County, TAA, & NAA classes
apartments in our area
Apartments told me as I was looking to rent
As a community leader, over the years I have dealt with issues relating to housing.
As a CONSUMER OF HOUSING THROUGHOUT THE YEARS
As a homeowner, renter and landlord. Equal housing should be available for all.
As a housing provider, I am required to be compliant
As a landlord for rental properties
As a member of my HOA Board and past chair of the HOA Advisory Committee, it was necessary for me to have a relatively good knowledge of fair housing practices.
As a Plan Commissioner and then a Zoning Commissioner for the city of Fort Worth
As a teacher, sometimes housing issues come up with my students' families.
As property director for the last four months I am becoming aware of the various Fair Housing laws by which we must comply.
As residential rental property owner
Attended a housing orientation for perspective landlords.
attended public informational meetings when Stonegate housing became available to Arnold Ripley residents
Before I retired I was a banker and ran a mortgage lending department
Being a landlord, I was interested in the requirements
Buying and selling real estate
By having undesirables relocated to my neighborhood which they could not otherwise afford. We should not subsidize housing or require that apartment complexes provide "low income" units.
by my neighbor
By reading the newspaper and other media outlets
By serving on city commission
By working as an advocate for the mentally ill community
By working at an AIDS Service Organization in Wisconsin.
CFW housing handbook
Chase provides ongoing required training
Church, social justice studies
Common Knowledge
Common knowledge concerning racial discrimination issues.
Community leader of downtown residents
descriptions on house listings and advertising regarding fair housing laws and from college law classes.
Documents completed during real estate transactions
don't know too much about "fair housing", but anytime "fair" is used it usually means someone is going to have to pay for it. I am against fair housing if it is to be paid for with Tax Money. (federal, state, or local)
Due to discrimination against me.
Education and being an active and productive member of society.
Education as a lender
Educational and Experience.
Experience in dealing with citizens issues/needs
Family and friends
For many years, I worked in the housing construction / real estate industry.
Former renter
Fort Worth Housing Authority community partnership with local government
from friends who own property
From reading about it in publications
from working at MHMR and exposure to the industry from it

general news
Getting my real estate license years ago gave me a decent understanding of the subject. But I did not stay in that field and am not that familiar with the current status of the fair housing laws.
Having lived in Public Housing before. Attending various meetings that were held.
High School and College Courses, I've also seen billboards in the NE Mall in Hurst addressing Housing Law
HUD guidelines and attended city hearings for sexual orientation and transgender inclusion
Human Relations Commission
I am a former "California" Real Estate Agent, so I had to understand the laws in order to be licensed.
I am a professional business woman and many of my clients receive section 8 housing assistance. Also our neighborhood has many section 8 apartments
I am a social worker and often need to advocate for clients to have equal access to services, including housing.
I am associated with a non-profit organization that has fair housing as part of its mission.
I am aware of some commitment to ensure those with little to no income have options such as HUD Housing.
I am currently undergoing "Housing Discrimination" by "The City of Fort Worth, Tarrant County, and other "Related" entities.
I am involved in the neighborhood association and try to keep up on policies that affect us.
I attended a class on fair housing.
I became aware of fair housing laws through a former job. Also, I've been an advocate for a client who experienced housing discrimination.
I became familiar during my role as a manufactured home sales consultant in 2002. Also, some of my studies have included the evolution of the Fair Housing Act of 1968, and it's subsequent updates and modifications.
I have a rental property
I HAVE BEEN WORKING WITH HOUSING CLIENTS FOR THE PAST 7 YEARS, WORKING WITH THE FAIR HOUSING COMMISSION, HOUSING AUTHORITIES, AND VARIOUS LANDLORDS. IN ADDITION TO BEING THE PRESIDENT OF A HOA THAT HAS RENTAL UNITS, I OVERSEE ALL RENTALS
I have taken several real estate classes that have discussed fair housing laws.
I learned about them through work in the community.
I learned general guidelines during Real Estate License education. I participate in ongoing education, subscribe to email and video updates to stay current on the issues and hot topics in the industry.
I read and am involved with the homeowners assoc.
I read the laws pertaining to renters and owner some years ago. I have 2 rentals.
I rent some properties, so I am aware of fair housing laws.
I was a leasing agent at an apartment complex which requires understanding of these laws
I was the CRA loan officer at Viewpoint Mortgage
I work for the REALTOR Association.
I work in commercial real estate and small business lending; part of it is annual training.
I worked with a non-profit housing organization for 10 years.
I'm a banker
I'm a Human Rights Specialist/Investigator.
I've recently searched for "fair housing laws in Texas" and reviewed the basics.
I've taken classes as well as worked with the Arlington and Fort Worth Housing Authority.
in my public policy classes
In owning over 15 multi-family properties, as well as managing other properties through contract for the owner, over the last fifteen years in Texas, I have become familiar with housing laws by experience and personal study.
in the context of a project I did with CHODOs several years ago
In the past have had to get involved with some potential fair housing issues.
Informational flyers
Internet
Involved with legislative matters and associates/colleagues who are involved with fair housing.
Involvement with neighborhood association, city updates in news, readings in social issues
Job related
Know how to find out information when I need it.
law school
Law school
Law School
Legal research for clients.
Legal seminars pertaining to the Red Book ,provided by the company I worked for
Licensed Real Estate Broker- required class work
Life
Limited online research
Licensed Texas Realtor
Mainly what is covered through the media.
Media
media coverage
Media, church and school involvement, city programs.
Military member who relocated often in 1970's and 1980's
multi-family housing for 34 years
multi-family housing training
multiple home purchases
My daughters buy and sell real estate

My husband is a real estate broker and we have discussed this in the past.
My job
My job.
Neighborhood Association
News outlets
News paper articles, reading, talking to realtors
Newspaper
Newspaper articles
Newspapers, TV
NMLS Licensing and cont., education
not enough details, but enough to know that there are too many overlapping programs serving too many niches making it difficult to navigate
One of my clients works for HUD
One of my sisters is employed by a county housing office in another state and I have assisted a friend in problems with her Section 8 voucher.
online HUD description
Online research
Oversee fair housing in Tarrant County
own rental property
Personal experience as a Section * housing voucher receipient and other advocacy work with TCHC
Practicing in the area of fair housing discrimination law.
private investigation management involved in tests about housing.
Property management
Psa announcements on TV & radio
Public information
Public media
read news stories
Reading
Reading about them online
Reading and hearing about in the news
Reading and on the news
Reading articles or
Reading materials provided by government, local newspapers and court cases
Reading news articles and having apartments in my neighborhood that are required to provide low rent or subsidized housing.
Reading periodicals, newspaper,tv
Reading the newspaper, listening to coverage on National Public Radio
Reading, personal involvement
Real Estate broker and we have to do Legal every 2 years
Real estate classes and various seminars
Real Estate School
Rental units
Renters in my area
renting places to live, then purchase of home.
Required training to maintain my lending license
Research and need to be aware of their implications
Research related to my job in the municipal government
Research, newspapers
Researched laws for work
School, reading
section 8 housing
Self educated on the matter
Self educated reading posted laws
Self education
Service on appointed boards/commissions in cities in Texas.
Since the first laws were passed in the early 1970s I've been aware of the effort to make housing fairly open to all people.
Studied Urban Planning and working at a multidisciplinary consulting firm.
Through involvement in Neighborhood Associations
through my company updates as well as property management organization updates and articles
through my company, training regarding CRA also our involvement with the FTW HOUSING Authority .
through my employer
Through my involvement in SteerFW.
Through my job an news articles
Through my university research role and as a city council commissioner for Directions Home
Through my work in government sector.
Through personal education.
Through Real Estate Closings.
Through state licensing requirements.
Through the local boards I am involded in. I here about them through concered citizens
Through work

Thru work.
Useful in preventing discrimination based on race, etc.
Was covered in my civics class, and part of the history of our country
When I rented an apartment in Fort Worth, I asked about the types of people (i.e., ages) of the people in the complex. The staff was not at liberty to tell me, citing Fair Housing laws. They said there was a mix of people.
When purchasing my home I was open to the idea of multi-housing and becoming a landlord though I ended up buy a single family home.
While try to help others find housing stumbled upon these laws.
work
Work in apartment industry
Work in rehab of affordable housing
Worked for many years in the housing industry providing community revitalization
Working as case managers in the field.
working with people
Working with the City of Fort Worth
working with the homeless population for the past 10 years

Table B.2
How should fair housing laws be changed?

City of Fort Worth
2013 Fair Housing Survey Data

Comments:
1. The burden of proof should be higher to offer more protection for sellers who face bogus claims of discrimination. 2. In turn the penalties should be more severe 3. Felons should not be a protected class- there is some talk of in cities like San Francisco
A completely non-biased, objective (rather subjective) process should be quickly implemented based on chronic illness, medical disability, or vulnerability. This process should be standardized across service providers.
A person's employment status, ability to pay, and/or past rental or mortgage history should be all that is used. Credit score is bogus in this case and shouldn't be used.
allow persons with a felony history to be considered
Anyone who applies for fair housing on above list is turned down.
As an individual, I should be able to sell/rent (or not sell/rent) my home to whom I choose without government intervention. I think this should apply only to an individual's rights and not to companies or corporations such as apartment complexes or sub-division developers.
As an owner of private property available for lease, it is my business, and mine alone, who I choose to accept as a tenant. I use references, employment history and credit scores as a primary basis for acceptance. However if someone smokes, does not speak english, or has five children I will not lease to them. My property, my choice.
At minimum, sexual orientation should be added as a protected class.
Bank should explain how interest rates work. I have a fixed rate loan. After paying for eight years I am still paying more in interest than when I first got the loan. I complained to the government and they did not respond. They told me to talk to my bank.
Better enforced
Discrimination is possible, based upon age since it is not specifically defined other than for dependant children. I believe this should be corrected or clarified in new language.
Done away with as they are another intrusion on my life combined with added bureaucracy and wasted tax dollars. Money we do not have.
Everyone should be considered equal
Explicitly make it illegal for a neighborhood association or other entity to fight against the construction of permanent supportive housing on the basis of the characteristics of PSH residents
Fair housing laws are no longer needed. Barriers to fair housing no longer exist.
Fair housing should not give preferential treatment to anyone.
from what I have heard, they are difficult to enforce & there are not enough people monitoring
Hold mortgage companies accountable for lies ab deceit.
Housing costs should be lower to give people opportunity to buy- developers & persons buying investment property are winning all bids on HUD & other lower cost housing by 50%. Local families should be given favor over developers or investment property owners.
How is it fair if some groups are "protected" and others are not? The very basis of that is discriminatory against non "protected" groups.
I believe that "fair housing" should not be subsidized by the government. If individuals can afford to live in an area they should not be discriminated against but we should not be paying for people to live where they can not afford.
I do believe that a homeowner should be able to choose who rents his or her home, based on how the potential tenant presents him/herself and how the homeowner believes potential tenant would maintain/protect/clean the homeowner's property. In other words, if I decide to rent out my house, I don't want to be forced to rent it to someone who might destroy it or not maintain it properly.
I don't know enough about them to say they should be changed but I do know there's a great need for better options for seniors. I doubt they are relevant in this day and age.
I think a landlord should be able to rent to whomever he/she chooses
I think that laws in general need to be kept up to date to represent the current times.
I think the law is there to protect homeowners and renters. It just needs to be enforced and people need to be made aware of their rights.

I think there needs to be some incentives or ways to open more housing options for those with criminal records.
I think they are sufficient
I'm not sure if fair housing laws include class protections for freedom of speech, expression of political views, or sexual preference but I think those should also be protected.
If a landlord refuses to rent to a disabled person or race based, in the end the landlord loses. Let he/she sit on the empty property if they want. Also, if a landlord did not "want" me, personally to rent. I would want to know and not lease the property. I would want a landlord who will put effort into being a "good" landlord.
If LGBT individuals are not protected, I would support changing them.
If they do not already include social orientation (real or perceived) as a protected category, they should.
Illegal immigrants should be explicitly excluded
Include above categories - I do not believe those here illegally should be able to purchase or rent.
include additional protections against discriminated populations.
Individuals are treated unfairly by landlords all the time, but do not fall into a category within the fair housing law. For example a landlord treats a client receiving housing assistance different than one that is not. But the client does not have a disability, and can not prove discrimination in accordance with the law. In addition, when a case is proven, there is not relief for the client because the commission attempts to close the case without the client being made whole, and the client does not understand their rights to file
It should be abolished as it serves absolutely no purpose whatsoever. The only thing that it accomplishes is printing more paper and creating jobs for someone to manage this paper at multiple government levels. Cut the costs, get rid of the useless program.
It's about creditworthiness, ability to repay, and not discriminating against protected classes - as opposed to ensuring equality of outcomes and managing to statistical formulae.
Just enforced.
Landlords over charging in excessive late fees, NSF fees, not fixing apartment but continue to raise rents. Bentley Square Apts charges \$100.00 for NSF which in state of TX is only \$30.00 unless your a bank and it's \$32 - \$36.00. They have in the past was collecting rent from residents whom wasn't leaving there on their vacant apartments. I'm requesting to be investigate due to they receive several of dollars from HUD.
Laws should be made the exactly the same for everyone. Especially whether or not individual(s) have prior arrest history.
Less government interference in the market place. The more government intrudes into our communities the worse matters become for the truly needy.
Low Income qualifications should be adjusted. I feel that the current figure is too low considering the cost of living and state of our economy.
Making sure fair housing is available for everyone.
Not changed but when a complaint or concern is brought to our attention, should be taken serious and thoroughly investigated.
Only to protect more classes of persons -- not to dilute them.
Probably
Remove all protected classes. People need to pull themselves up by their own bootstraps.
Repealed.
See comments above
Set up better communication of available resources to those who need them throughout the country.
sexual orientation as protected class
Sexual orientation/gender should become a protected class, as well.
Simplified so that they can be more easily understood by general population
So that everyone who is seeking shelter be given the opportunity.
Stop singling out neighborhoods like Rosemont to use as your dumping ground. Neighborhoods would survive and thrive if only you would stop your "do-gooderism". Government bureaucrats and do-gooders don't see the harm they leave in their wake. Stop justifying your government paycheck.
The language of the "The Fair Housing Law" allows for many interpretations on it's own, when it is interpreted with other programs, that allow a lessor to charge rent under some local, state or federal program forced upon the lessor to charge a greater amount of rent, (i.e.): A three bed room apt. rents for \$700.00. A program exist that allows the lessor to charge low income renters a set percentage of their income according to the program guidelines. This is misapplied to persons renting who are not on any subsidized program, so if these persons earn \$10,000.00 a month, and the landlord decides to use percentage rule in a program not signed up for by the renter, that rent can be as much as \$3,000.00 a month instead of the regular no-program amount of \$700.00
The laws should also protect people based on their sexual orientation
there is a great need for housing for individuals who have paid their price for engaging in criminal activity, including registered sex offenders. The refusal to provide housing to this group of individuals actually ensures continued criminal activity and recidivism as a stable living environment is a necessary to obtain and keep employment. By refusing to provide housing opportunities, we create a permanent underclass of guaranteed criminals and recipients for public aid.
There should be a wider spectrum of classes, such as sexual orientation. Providing better accountability standards to individual federally funded projects or building a communication system to better listen and collect data from the public forums and input, providing a clear accountability factor across all projects and improving the process of providing the proper enforcement of law findings
These laws have made it too difficult on landlords - the balance of power has swung to the side of the lessee - even if they're wrong.
They are outdated and used unfairly. The penalties are too extreme and are subject to abuse. It should be more difficult to prove such claims. Cities cannot make common sense decisions for fear of such claims, even when the claim would be unfounded.
They should be removed. This is 2013, we are treated fairly and laws just create more discrimination. We are past the government causing more discrimination in our city.
to assist low to moderate income persons find affordable housing in a variety of neighborhoods.
To consider fair housing rental to recently released ex-offenders could be changed. As EEOC guidelines in regards to hiring someone with a criminal background same guidelines should apply in considering someone for housing based on type of offense, when it occurred, and its impact. A voucher program for recently released ex-offenders could be provided to those facing

homelessness, transitional living situations (halfway houses, substance abuse treatment centers) to be considered. Employment is a necessary condition to all parolees to attain. Those parolees who attain employment, could be consider for a voucher. Parolees currently living in homeless shelters and employed, should have a voucher as well. Additional re-enforcement on individuals considered long-term residents should be reviewed, and acted upon to get them off of housing, sort of a deadline to obtain within x amount of years and a rental rate increase chart with expected payment amounts towards full market value rent. Also, have mandatory Financial Literacy courses that focuses on self sufficiency ongoing for every single resident that is able to work and unemployed, and employed.
To include everyone
to not racially discriminate against tenants that make a complaint towards section 8 apartment management or managers
We need to stop subsidizing housing. People should live where they can afford and if they want better they are free to seek that on their own. Get the government out of business.
Where we allow low income individuals to be grouped together.
with all laws there needs to be reviewing , revising and then implementation.
with the invention of internet and fox news channel fair housing issues should be non existent today.
Yes to make sure on a federal level, sexual preference discrimination is included

LOCAL FAIR HOUSING

Table B.3
Are there any specific geographic areas that have fair housing problems?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
All areas of the city. However, each side of the city has their fair housing problems.
As a de facto matter. There are grocery store deserts and the role of credit in establishing utilities is a huge problem low income residents.
As before - poorer areas have fewer tax dollars to work with, and therefore less attention.
As in any program there are individuals who will unfortunately fall between the cracks as well as the lack of funding causing cuts to an already needy budget.
But I believe it is based on income and job stability more than discrimination.
Concentrations on East side and West side Calmount / Las Vegas Trail corridors
East and south Fort Worth
East Fort Worth has more high density housing, less large single family; perceived and marketed as lower income, white collar, non-white
East Fort Worth is given all the homeless and no other part of the city has any.
East of downtown Fort Worth is particularly problematic; however the Southside, Near Southside, Near West are also becoming escalated problem areas.
East side
East side of downtown Fort Worth
Eastchase Meadowbrook area
Eastside of FTW, 76112
Far North Fort Worth-Alliance area. Right now apartment complexes are to be built in Alliance where over 4,000 jobs are to be created within the next 5 years. Areas in North Fort Worth and West Fort Worth need to become more open to housing. These two geographical areas have high density of ex-offender returnees. Having better accessibility to fair housing will provide a stable environment without the need to steal, sell drugs or prostitute in exchange for a place to live.
Homeowners nearby are experiencing lots of theft.
I know that people have been price out of downtown Fort Worth.
I suspect so, but don't know specifically.
I think these problems are ubiquitous
Maybe
Meadowbrook/West Meadowbrook/East Lancaster
mid city
more affluent areas
Mosier Valley, Stop 6, Eastwood, South Side, North Side, West Side
Mostly in the "low income areas".
Near East Side; Far West Side; Far North Fort Worth
New development in the west is incredibly exclusive.
North side of Fort Worth - poor quality of rental properties and real estate
Northeast Fort Worth, north of I-30
Northwestern Ft. Worth
probably
property owners say FWHA does not increase payment or rental allowences even slightly for longer term stability.

SE FW has problems created by overbuilding multifamily units.
Some Management companies within the apartment concentrated areas of Fort Worth (i.e. East & West Fort Worth) lack knowledge of some basic Fair Housing laws related to Handicap, reasonable accommodations/modifications
Sort of a loaded question if you consider it only "fair" that any person should be able to live in any part of the city regardless of thier circumstances. If one has the financial resources one should be able to rent or buy anywhere they want to. That being said, just because someone wants to live in Rivercrest but there is no Section 8 housing available does not make it unfair.
South and East Fort Worth
south-eastside of Fort Worth, west 7th
Southeast Fort Worth - struggles with several group homes and slum lords. Homes in the area often do not meet code and continue to be rented to cleints creating health and safety issues.
Southeast sector
Southside; east side; west side- como; portions of southwest; tcu
Tanglewood. The prices are too high for most people. :)
The Cavile, Stop 6 area is one of several geographic areas in the City that has fair housing problems.
The City of Fort Worth Fair Houseing singles out certain neighborhoods to put to concentrate their activities. To single out neighborhoods like Rosemont for your clients is unfair. All neighborhoods should share equally in locating low income people. No neighborhood should be asked to share an unfair load.
the creation of income-restricted subdivisions ensures fair housing problems. any mandatory HOA is an impediment to fair housing.
The Diamond Hill - Jarvis area. When they come to work on Street projects, they begin the project and leave it half done for months until I call and ask if they're gonna finish the project. I can appreciate that they're busy but if they could just come in, concentrate on getting it completed, then go on. I can go through another neighborhood and notice they got their street done overnight. Rufe Snow in NRH for instance, was repaired over night. I say this because I travel that street daily. Beaumont has been under construction for a year. And there's no one there.
The entire city.....could we outlaw blue paint before we forget.
to many students living in my area
West Fort Worth.
west side
Westover Hills
What area Doesn't.
Woodhaven
Yes, Brookside Neighborhood. We are somehow exempt from city oversight

Table B.4
Please share any additional comments.

City of Fort Worth
2013 Fair Housing Survey Data

Comments:
A waste of resources that could be used to make wider roads to get me to work to pay my taxes.
Also, a housing triage system at homeless shelters for the single individuals and families into a voucher program. Currently, Fort Worth's homeless shelters have increased exceedingly for domestic violence victims (women and children specifically). Shelters like Union Gospel, Presbyterian Night Shelter, YWCA, Safe Haven, Salvation Army and others struggle to maintain the increased load as well as longer than normal occupancy rates. Fort Worth ISD counts as many as 1,943 students as homeless which is a low number when considering the Hearth Act limitations. More housing opportunities will become in existence when current occupants obtain self sufficiency and move forward out of housing assistance programs. Affordable housing rental units should exist where employment opportunities are more plentiful-not Inner City. More in demand jobs to be filled exist OUTSIDE of Loop 820. Downtown Fort Worth no longer has manufacturing, production, and logistical distribution centers as it once had in abundance decades ago. It is very limited in these industry sectors. A deeper analysis on industry trends, where residents are located and transportation accessibility should be done immediately. Perhaps conduct an employment survey on housing residents as to what geographical locations they work in and where they live will provide future trend projections and employment needs towards better self sufficiency for other residents.
As previously noted I do not think a private property owner should be forced to rent or lease to just anyone that may show up. As a private property owner and landlord I receive no public subsidies or assistance and have an interest in maintaining the value of my property. I will not lease to a smoker due to the risk of fire (but I suppose no one cares about discrimination against smokers). I will not lease my two bedroom/one bath single family house to a family with five children due to potential damage to the property. I will not lease to someone that speaks no english as I am not going to hire a translator to deal with them. I will not lease to someone that smells like a drunk. I will not lease to someone that cannot show adequate proof of income or employment history. If these things are not fair I can only say it is my responsibility to mitigate as much risk as possible as it is my property, my choice
Color, race, sex, disability, etc... Is not a factor. I believe, the general population is 100% fair. There will be a small percentage in ALL races that will always have issues, but we cannot drag others down because a few have issues. Those individuals are sad, unhappy people that will continue to find something to gripe about.
Don't use local taxpayer money promoting this. This is a federal issue.
Fair housing always seems to show up on the east side of fort worth with even more low income housing in an area with absolutely no jobs. One wonders why it isn't being built near alliance airport where all the tax supported new jobs are located.
Fair housing appears to be in "full swing" in my neighborhood. Over the past ten years or so I have watched the homes around me become occupied by people "less fortunate". Unfortunately the rise in crime, and poor behavior have also moved in with them.

Fair housing seems to be quite successful since these negative issues that actually lower my property values and quality of life are ignored in name of "fairness". One day soon we will most likely sell our home or rent it to someone with a housing voucher. Eventually my neighborhood will become a utopia of "fairness" that most people of intelligence will no longer wish to reside.
fair housing is more a matter of economics and credit rating rather than discrimination
fair housing pressures should temper but not dictate to zoning. Zoning, especially residential should avoid mixing communities at cross purposes and life styles.
Fort Worth has one of the best housing policies and staff in the Country. I wish they were all like those in Fort Worth
Further government intervention into this area will only harm as opposed to help those living in poor areas.
Get the resource available to everyone , not just those trying to seek welfare or government aid. The Tarrant county or city should have people that help single's with children not on welfare or food stamps find housing while attending school instead of forcing them to live with their parents.
I am a 30+ years homeowner and have little contact with the rental process
I am only aware based on early training. this is not part of my everyday job and I therefore am not familiar with many issues related to this topic.
I am trying to fix my house it's falling apart. I need an equity loan. Help.
I apologize for being so ignorant. I do not detect any restrictions or limitations in my neighborhood, and I think the neighborhood association would have been told if individual households were having problems.
I can not think of any.
I had to run through this. I know there are many issues regarding fair housing. Thank you for your surveying efforts.
I have 20 years of documented proof, photos, videos, and records, This is one big "CRIMINAL ORGANIZATIONS"
I know very little.
I think outreach is important and a valuable tool to spread the word.
I think that overall Fort Worth has a decent track record.
I think this survey has made me more aware that I do not know much about fair housing laws, I think its time to learn more about it. Thank you for the opportunity to express some concerns. I hope it will be helpful in the future,
I'am disabled and worry about having to relocate again because I report issues such as being a target for racial harassment from residents kids and unresolved property safety issues that management can't handle
I'm not familiar with what is going on in the Ft. Worth area. All my experience was in El Paso, TX.
It is my opinion that the vast majority of persons involved in the real estate industry do not illegally discriminate in housing.
It seems that particular ethnic or racial groups live in areas, such as Como or Stop Six for example, that appear generally low-income areas. Poverty ties into the issue of fair housing. I have lived in this city for 36 years and recall what I believe was equal opportunity housing opening near Stonegate on Hulen Street. There was lots of negative publicity surrounding that project when it opened, but I have not heard anything negative since. I am not aware of other efforts to offer fair housing in higher income areas. I would like more education about what the city is doing to address fair housing. My dream would be of living in a city with more diverse, integrated neighborhoods.
It will never be truly fair in any city, has not in the past either. A person in the mid range of finances are never eligible for programs, help or assistance. Money , or lots of it will always talk.
looks like the city is going to have to hire lots of people to keep up with all the proposed rules
Low income housing is being concentrated in already struggling neighborhoods making it difficult for all concerned.
My thoughts for increasing homeownership, (my area is the lending industry) would be to develop and assist first-time homebuyers with monies, (down payment assistance) to help secure a home purchase for older homes, or homes that may need repairs. Our current market show a decrease in the inventory of available homes, and provide assistance to help with minor, (or major) repairs could provide increased economic development, jobs, and affordable housing. Loan programs from the private sector such as FHA's 203K streamline, (203K may also be an alternative), and Fannie Mae's Home Path, can be utilized to assist in this effort.
n/a
N/A
Need more affordable clean safe housing in under-serve areas. Also renovate and tear down old apartments and houses build new ones to make the city look more liveable.
No blue paint and no bright yellow, orange or red painted houses. This is not the Pacific coast immigrants.
Obviously, I don't know much about it. :(
Our neighborhood is diverse and welcoming other than that I am not sure how the rest of the city is doing>
Per my responses, my household (my spouse and I) are unfamiliar with fair housing developments in and around Fort Worth. While have heard no complaints regarding discrimination of any kind, it is still interesting that the subject has never been raised to us previously.
Please don't spend additional tax payer dollars on initiatives based on a few exceptions, rather than the general rule.
Thank you for seeking our input!
The questions ask "are you aware" and then offer "No" and "Don't Know" as options, which seem to be so similar in context as to be confusing.
These last questions seem to be a rehash of earlier questions.
This is a wasteful effort. As soon as the policies destroy one neighborhood the good neighbors move on to a better neighborhood. You can not legislate equity. There is nothing mentioning "fair" in the US Constitution on freedom so individuals can pursue happiness.
This is much more than a fair housing questionnaire. It is about how this City functions, or doesn't function, with regard to affordable housing, job access, public transportation, services, etc. All areas the City needs to concentrate on and doesn't, IMHO.
This survey has been enlightening. Offering presentations to inform volunteers on various city commissions and boards about the Fair Housing Plan would be a valuable contribution.

What ever your motives are; your questions presumes matters that aren't factual. Your questions are loaded and biased. Let people work hard, save their money and then when they by a home it will have real value and meaning. Where you go you leave drugs, gangs, and devastation.

You are so obsessed with doing good that you don't see the harm you leave in you wake. With all your good intentions you destroy neighborhoods.

FAIR HOUSING IN THE PRIVATE SECTOR

Table B.5
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
ability to consistently pay even with programs.
application fees and other upfront fees charged the homeless virtually guarantee that they cannot obtain housing.
Arbitrary management decisions regarding non-renewals and evictions
Being asked about housing voucher status prior answering questions about available units and being shown units
Bigotry, racism, Section 8 isn
City ordinances
Color is an obvious factor in this area if the metrics are evaluated into city sectors
criminal background, low income
Gated apartment complexes that raise rent when showing to a couple than when showing to a unmarried fellow with kids.
I do not live in an area that would give me any insight to bad practices
I have had landlords tell me they did not want to rent to me because they prefer a married couple and I have a roommate (friend, not partner).
I have heard people say "I won't rent to -----?" While the owners think this may is their "God given right to rent to whomever I choose," this allows discrimination based on personal bias rather than objective decision-making.
I have heard there are areas in the city that do not allow minorities to live in the neighborhoods, but have not experienced it personally.
I heard that young adults may/should be a protected class. I don't think that there should be any age discrimination. If someone meets the financial requirements and abides by the ordinances, they should be able to own or rent anywhere.
I know about a persons rights when refused rental assistance concerning discrimination because of their race, religion, and age which applies the same to texas employment
I was impressed that, for my own apartment building, the staff were obviously well trained to avoid answering my question that might have put them in a position to be perceived as discriminatory.
i'm sure there are other reasons, but don't know what they are
If LGBT is covered, once I was told by my new landlady that she was glad I came along so she wouldn't have to rent to "that alternative lifestyle" couple. She was referring to a gay male couple she had shown the duplex to just before me. Apparently she assumed I wasn't gay.
In our neighborhood I have often heard (from homeowners who have garage apts. as rental property) that they do not advertise their property as being available because they "might have to rent to a black person."
income and race or closely related; housing for minorities is generally segregated to certain communities
Increasing the wait list to house lower functioning homeless people and families.
It's not fair to give 50% of the market to investment buyers - local families should be given more % access to the market.
Lack of adequate supply
Landlords overlook potential renters, because of race, disability, etc.
Newspaper articles have identified instances where Blacks are told housing was rented when whites are told it is available to rent.
No direct, personal evidence, but frequently heard anecdotes.
Not enough affordable housing
Notice in up scale apartments.....Black are in the rear of the apartments,
People evicted because woman abused by partner in the house; family size has determined rent history;
Private landlords decide that they have no openings when they find out you have a Section 8 voucher.
Private owners charging a premium to illegal immigrants
Refusal to rent to minorities
Refusing to rent based on race.
Rental unit prices are more expensive than housing voucher allowances
Residents oppose the rezoning or construction of apartment complexes which would provide affordable housing to folk
seems like some discrimination based on criminal history
Shortage of available affordable housing.
SOME apartment complexes have refused to rent to homeless persons due to the potential risk. Also many apartment complexes that are affordable to low income individuals are located in high crime areas with disproportionate numbers of minorities.
Spanish language training, information to renters
Sure West Fort Worth has passed all the people they choose not to live by to East Fort Worth for over 60 years I know of and continue to do so, and I will venture to say it will not change.
Sycamore Center Villa.
the city has intentionally created a ghetto on the east side by ignoring the impact of multiple homeless shelters in the same

neighborhood.
The City of Fort Worth
The home I purchased in The City of Fort Worth as a disabled veteran should not have been sold to a dog. All of the professional documentation says so. The Defibulator implants we each had to have because the house was killing us, Then the insurance refuse to pay and the VA turned it's back, The apartment we rented after the third fire that destroyed the house, black balled me so I couldn't rent another apartment. So "GOD" blessed with another house.(In the Midths).
The State of Texas, in its Consolidated Plan, certifies to the U.S. Department of Housing and Urban Development (HUD) that it will affirmatively further fair housing. TDHCA, as the lead affordable housing agency for the State of Texas, periodically prepares an Analysis of Impediments to Fair Housing Choice (AI) for submission to HUD.
Too much racial discrimination in city.
Unable to descriminate duento color an religion
Understandably so, there are great barriers for renters with blemishes on their rental history. Most of whom can't afford to pay double deposits.

Table B.6
Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
Adult communities
Asking about children before showing homes in downtown areas.
Century 21 and Remax
Citizenship
Community organizers and city councilmen who prevent building plans to house homeless women and children
Depending on income and maybe some other factors, more families are shown areas that are considered undesirable.
ediscrimination on the basis of irrelevant criminal background
Evictions of woman & children because of partner abuse; family size;
I believe the roanoke area is targeting an older generation only.
I hear of realtor seeking married clientele because they want to sell to double income clients, higher priced home, higher commission.
If that is true, I don't see anything wrong with it. Who wants a bunch of screaming kids next door.
In looking for a house, we were initially only shown houses in particular areas of Fort Worth/northeast Tarrant. Only when we pushed the real estate agent were our options broadened.
Industry tends to base perception of income based on appearance and possibly race/gender. Limits potential homeowner to certain areas of town and or housing structures based on perception of income.
Institutional racism. Often agents will show homes in particular areas based on their race or color. The agents are not intentionally discriminating, but feel they are being helpful finding a protected"good fit" for their client.
No direct, personal evidence, but frequently heard anecdotes.
not considering someone who has part time jobs, even with longevity, to be reasonable 'risk' for getting a home loan to buy not enough affordable housing
Not the real estate industry but Catholic Charities
Often, I find that the inclusion of down payment assistance programs, and Public Assistance clients have a difficult time in securing a real estate contract to purchase a home due to the lack of understanding of such programs from real estate professionals and the clients they represent.
Only selling properties used for renting in Stop Six community.
People need the availability to housing they choose not the choice of someone else, though I know that is not a reality. People with money and a snobbish attitude control their surroundings.
Real estate brokers do the same thing as landlords, and show preference to certain classes of people.
Same
See above
some property owners make limited repairs to properties in certain communities where there is a high number of children; these circumstances do not promote a safe environment for children.
the city has intentionally created a ghetto on the east side by ignoring the impact of multiple homeless shelters in the same neighborhood. Residents, who are primarily black, are trapped in deteriorating homes because the neighborhood values continue to decline instead of increasing.
The home I purchased in The City of Fort Worth as a disabled veteran should not have been sold to a dog. All of the professional documentation says so. The Defibulator implants we each had to have because the house was killing us, Then the insurance refuse to pay and the VA turned it's back, The apartment we rented after the third fire that destroyed the house, black balled me so I couldn't rent another apartment. So "GOD" blessed with another house.(In the Midths).
The main barrier is the level of education of realtors. My impression is that they don't get a lot of fair housing training, or else it doesn't stick.
This is where I feel that the testing is flawed. A client will ask for an area with good schools, lots of parks and rec center and HUD is spending money to find out if Realtors are giving the family opportunity to see the same areas as a single person that says I want to be close to the night life and easy access to the freeways Realtors show them the properties in the area they ask for.
Too many to list.
When information is requested about crime or "gay friendly" it is very difficult to respond as a Realtor, I am bound by Code of Ethics.
When my partner was selling her house, her real estate agent said she often has to tell sellers she can't discriminate for them by

finding only straight buyers.

Table B.7
Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
Bank of America and Countrywide paid a huge settlement for this
Bank of America, Chase, Wells Fargo
Bank of America, Wells Fargo
Basing mortgage interest rates on sex or race should be illegal; basing it on on your payment history or credit score should be fine.
Delays take place when hispanic women apply versus other individuals
different standards or priorities discriminating against women, disabled, seniors
Further to that, it's about creditworthiness and the ability to repay, regardless of race or gender.
Gender and racial biases
Higher rates for immigrants
I am trying to get an equity loan with good credit and I can't find one. I only owe approx 7,000 on my home and I have a good job. I am a single woman. I don't know if there's a racial issue. I hope not, anyway.
I do think (perception - not experience) banks are looking at single women purchasers and requiring more financial documentation than they do of married couples
I have a 7.6 percent loan. Never missed a payment never been late. Still can't get a lower rate. The model used to evaluate my house was wrong and about \$50,000.00 less than the value of my house.
I have found many mortgage lenders that offer higher rates when targeting the "hispanic market." Some pretend to help but only max out client budgets instead of adequately providing housing advice.
I have heard of these things happening but have not experienced them personally.
I HOPE THERE IS NO GENDER OR RACIAL DISCRIMINATION in lending.
I know from United Way's Community Assessment (2013 Update) that Texas ranks low in the nation in terms of cost of mortgages/home ownership, even though housing is affordable here. I also know that 50% of Tarrant County renters are more likely than home-owners to be "cost burdened" (paying more than 30% of their income for housing-related expenses.)
if they are a higher risk with bad credit or etc,i see nothing wrong with it.
It appears that women and minorities are offered and are paying higher interest rates
Minorities are approved for fewer loans, and have experienced a greater number of predatory loans
Miss use of credit score rating to determine interest rates for minorities. And for some just by being a minority period, interest rates are higher.
Mortgage rates, predatory lending
No direct, personal evidence, but frequently heard anecdotes.
not considering someone who has part time jobs, even with longevity, to be reasonable 'risk' for getting a home loan to buy
not enough mixed income areas
Not lending to potential homebuyers interested in homeownership in Stop Six community.
Offering higher interest rates to business owners and existing property owners is a form of extortion as there is a myth that these people can afford to pay more.
Offering higher interest rates to women or racial minorities. Refuse to lend to the economically disadvantaged.
Often, minorities are faced with higher interest rates ... resulting in a higher loan in the end.
Personal experience in dealing with some banking representatives (not all)
Racism
Rates for mortgages may appear to be biased against low income or minority borrowers but as a former banker I understand risk based lending and agree with the practice of charging higher interest for loans that have a higher propensity for default
Really you don't know?? Banking in this country is incredibly discriminatory on many levels
Recent study from Rugh & Massey showed housing crisis and unethical lending practices disproportionately targeted lower income minorities.
selling home mortgages on the secondary market has destroyed any flexibility in responding to changed homeowner needs. outsourcing the servicing of home loans to companies that have no relationship with the homeowners is also destroying home ownership. People's homes should not be 'investments' for other people to make money. A good start would be to prohibit selling home mortgages and requiring local lenders to keep the loans and keep the servicing at the originating institution. Some things are just to important to be placed in the free market structure of dog-eat-dog.
Sometimes lenders or sellers make assumptions about a buyer's financial ability based on race or marital status
The home I purchased in The City of Fort Worth as a disabled veteran should not have been sold to a dog. All of the professional documentation says so. The Defibulator implants we each had to have because the house was killing us, Then the insurance refuse to pay and the VA turned it's back, The apartment we rented after the third fire that destroyed the house, black balled me so I couldn't rent another apartment. So "GOD" blessed with another house.(In the Midths).
We cannot get a mortgage loan because my husband lost his job several years ago, but has been full time employed for 6 years

now, but that is not considered...only the past issue.
Woman have always been discriminated against buying an renting
Won't lend money in the low income areas so homes can be built.

Table B.8
Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
All types of handicap access are sorely missing from all of the newer apartments being built in the urban city area. This lack of access includes narrow doorways, electronic door openings to buildings AND to all restrooms, roll-in showers for wheelchair accessibility is non-existent. Ramps with railings are missing, too.
also every building has to have wheelchair access and handicap signs for all dwelling buildings
Assisted living facilities that are built with only one elevator that makes it hard for people who need wheelchair access when the elevator is out of service. These facilities should have a service elevator and not all of them do.
Builders don't want to restrict their sales, so doorway widths should be fine. Stairs, on the other hand, represent a problem to the handicapped.
city committeea are involved in working on housing design.
equal access
good rule
Handicap accessibility to all levels of a building.
I assumed most new construction was required to have a percentage of units be accessible to people with physical disabilities (i.e., wheelchair accessible).
I have seen the problem, but generally in older buildings that predate the regulations.
I know there a many older apartments that don't address the problems that people with accessibility
Investors including City of Fort Worth not interested in construction of quality housing designs specifically for potential homebuyers in the Stop Six community.
Many new homes are built with inadequate bathroom doors that allow access to wheelchairs. The doors are fairly small and guests in wheelchairs can't use the bathroom in many of these houses.
Minority communities are building "cracker box" houses with high market prices
More homes need to built with wider doors and something other than carpet should be offered to a wheelchair consumer versus paying extra money for wood flooring.
need more handicap apts
need more handicap apts and make doorways wider
New rental complexes built with narrow doorways that do not allow wheelchair accessibility
Only because of poor building construction techniques due to lack of trained, high integrity inspectors
People just don't think is the problem and then they don't care. And, if they can save a buck, they try to.
People of privilege often, often do not want anyone different from them around
persons with disabilities are not always considered in construction repairs for rental properties; homes are not always conveniently updated to assist physically disabled persons.
State Disiability and ADA do not allow for this.
The home I purchased in The City of Forth Worth as a disabled veteran should not have been sold to a dog. All of the professional documentation says so. The Defibulator implants we each had to have because the house was killing us, Then the insurance refuse to pay and the VA turned it's back, The apartment we rented after the third fire that destroyed the house, black balled me so I couldn't rent another apartment. So "GOD" blessed with another house.(In the Midths).
This is a ridiculous question. City of Ft Worth building codes have requirements on minimum width of doorways and corridors which mirror the requirements of the ADA. Additionally, plans for a multi-unit apartment complex requires the seal of a registered architect. As such, state law requires these plans to be submitted for accessibility review within 30 days of issue. ADA requires a certain number of units to be designed for accessibility, similar to the munber of spaces in a parking lot that must be designated for accessible parking. These laws do not apply to single family or duplex residences.
Too much Government
Truly accessible housing is difficult to find in all areas. A friend with an SCI had to build their own home to have access to needed accommodations
unaffordable designs
Wheelchair accessibility

Table B.9
Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:

Discriminatory red-lining type practices
I don't know but would not be surprised if the insurance industry had practices that are discriminatory.
I think the home insurance is very unfair, you can not get a quote that compares apples to apples every company offers something different and some insurance companies will not give you a quote if you know too much about the insurance industries...example when I have asked for the company to reduce the amount of coverage they said no that's all we offer.....that is not true
If you are a racial minority in Texas - you probably have less money to pay for insurance & fewer options for paying.
Insurance rates are higher and comprehensive coverage is not affordable.
Limiting policies and coverages for racial minorities
No direct, personal evidence, but frequently heard anecdotes.
Not to mention many other issues with the outlandish rate hikes allowed insurance providers, adding policies automatically, etc.
Offering higher premium rates to business owners and existing property owners is a form of extortion as there is a myth that these people can afford to pay more.
only if the home does not meet city codes. race has nothing to do with it
Racism
Redlining by banks giving rise to subprime lenders. Need I say more?
State Farm, All State
The home I purchased in The City of Fort Worth as a disabled veteran should not have been sold to a dog. All of the professional documentation says so. The Defibulator implants we each had to have because the house was killing us, Then the insurance refuse to pay and the VA turned it's back, The apartment we rented after the third fire that destroyed the house, black balled me so I couldn't rent another apartment. So "GOD" blessed with another house.(In the Midlands).
zip codes tend to show where there is a greater concentration of minorities and insurance rates are higher in these areas.

Table B.10
Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
Appraisal values are based on race composition of neighborhood and the lace of valuation and investment exhibited by the City of Fort Worth's City Council and especially the City's Housing Department.
Appraisers have no idea what they are doing these days and pretty much lump the pricing in based on their own view of the make up of the neighborhood, often times skewing the MLS facts to what they personally think.
Areas with a higher number of minorities have lower home values.
Aren't we all aware of that
Basing home values on the ethnic composition of neighborhoods
Charge more to some races.
Currently live in similar area.
East Fort Worth is predominately minority. Our home values are much less than those in other parts of the city
Experience this practice in my neighborhood.
Face the facts. Gang activity is associated with certain neighborhoods and ethnic groups. If gang graffiti is evident in a neighborhood values will be negatively impacted. Properly parent children and many of these issues go away.
Gentrification is forcing seniors out of their neighborhoods
Have heard our clients and re professionals imply that they feel this is sometimes an issue.
Homes should be appraised on their value, not the neighborhood. There's a huge difference between the east and west sides of town.
I feel this is sometimes done but that often housing in depressed areas for lower income persons historically occurs
I know this occurs when criminal activity in nearby areas affect the values of other homes in the area. I personally saw this happen after the relocation of residents to the Stonegate Villas area of Fort Worth after the teardown of Ripley Arnold.
Inflated appraisals in low-income neighborhoods
lower values
My home has dropped a lot in value and it is only because of the race of my neighborhood
No direct, personal evidence, but frequently heard anecdotes.
Particurlly if you live in a low income area. Appraisal's are different.
People often want to move where they are different to make a statement, not because they really want to be there.
Racism
Skewed property values and undervaluation
Some areas are valued more than areas that have the same size lots or sqft size.
The home I purchased in The City of Fort Worth as a disabled veteran should not have been sold to a dog. All of the professional documentation says so. The Defibulator implants we each had to have because the house was killing us, Then the insurance refuse to pay and the VA turned it's back, The apartment we rented after the third fire that destroyed the house, black balled me so I couldn't rent another apartment. So "GOD" blessed with another house.(In the Midlands).

They are too unregulated to comment on.
this area is very discriminatory an should be illegal
This is fairly obvious, with homes in white neighborhoods being valued more highly than in areas with high racial-ethnic populations.
This seems to be a common practice. it can prevent a mortgage loan from going through. Part of this is due to appraisal guidelines being much tougher now than several years ago.
Well I have just noticed that the more ethnic neighborhoods are valued much less than white neighborhoods. I think this is important to the economic development for entrapranuears though because its this cheap housing that will appreciate the most in twenty years. I believe in the ethnic composition of appraising.

Table B.11
Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
Additional barriers include the arrogant mentality of City of Fort Worth's housing department staff and their lack of inclusion of key community stakeholders when it comes to development and implementation of housing strategies for the Stop Six Community.
Allowing housing problems to go unattended (i.e., water getting turned off, door locks not working) for people who depend on housing vouchers
If anything we have gone too far in "Fair Housing". It now feels discriminatory against hard working families who have done it on their own. I private property owner should be free to sell or rent to whoever he pleases. I don't see the government helping to clean up messes left by bad renters.
Is there any way we can pass and ordinance to discourage illegal immigrants from painting all houses and businesses with blue paint.
Landlords routinely raise their rates with the FMR, and they have made it very difficult for those individuals receiving disability to be able to afford housing.
Neighborhood opposition to change in zoning for apartments to provide affordable housing and City zoning commissioners and City council denial of changes as a result of the neighborhood opposition is a major impediment or barrier to the ability to provide such housing.
Real estate service providers- agents and brokers seem to steer minorities in areas where they will not have the best quality of life for the sake of a commission. This is the new way of steering.
Section 8 housing located in prominent areas presents a huge issue for home buyers.
See number 1.
should have a service whose sole agenda is to cut taxes. such as having all city employees pay for their insurance and retirement. wow wouldn't that be good for the tax payer. teachers included
The home I purchased in The City of Forth Worth as a disabled veteran should not have been sold to a dog. All of the professional documentation says so. The Defibulator implants we each had to have because the house was killing us, Then the insurance refuse to pay and the VA turned it's back, The apartment we rented after the third fire that destroyed the house, black balled me so I couldn't rent another apartment. So "GOD" blessed with another house.(In the Midths).
There are no integrated disability transportation and housing services for the homeless nor for the disabled.

FAIR HOUSING IN THE PUBLIC SECTOR

Table B.12
Are you aware of any questionable practices or barriers to fair housing choice in land use policies?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
Affordable housing units are built in low-moderate income minority communities. Many times against the wishes of the community.
AFFORDABLE multi-family housing has been routinely prevented on the near West side close to the downtown area.
again, the city has created a ghetto by congregating all the homeless shelters in one area, which hurts all residents of that neighborhood, who are primarily black. Home values are depressed well below the rest of the market and continue to decline while the rest of the area enjoys rising values.
Allowing tracking to occur near public housing
Apartment dwellers have no say in how the minerals below their homes that they have legally rented are put at risk by 'fracking'. I believe that the population of a complex should have a voice as well as the generally corporate owners of the complex
Creating large apartment complexes just creates a future slum. Smaller complexes would integrate better.
Discriminatory zoning decisions
Do recall publicity in the past related to neighborhoods objecting to affordable housing projects. Does not seem to be as much of an issue today due to success of more recent projects.
Feel developers have tended in Fort Worth to concentrate muti family developments in cocentrated areas causing devaluation and depreciated property values and unfourtunately increase of crime believed to follow

For better or worse, zoning, by its very nature, imposes limits. The Mixed Use districts have mitigated the situation to some extent.
higher income neighborhoods do not have housing options for low income people
homeowners associations should be outlawed. this is the lowest form of Nazi government. HOA's foreclose on individuals and, in my experience as a consumer finance attorney absolutely refuse to have any flexibility. The ability of HOA's to foreclose should be eliminated. in addition, all subdivisions should be required to offer a variety of sizes of homes to prevent the development of income-segregated neighborhoods.
I am aware that a certain piece of property was purchased by a church group because the word was that the city was planning on building low-income housing there and this group wanted to prevent that.
I assume zoning policies delineate locations where multi-family housing is allowed.
I don't know the actual policies, but it seems that an awful lot of assisted living homes and Section 8 housing winds up in the same neighborhoods.
I know there are zoning laws that dictate such things
It is not "policies" that may concentrate multi-family housing, it is zoning ordinances.
Just look at where assisted housing is concentrated in this City. Also, the inability of the City Council to do the right thing vis-a-vis neighborhood opposition, which is generally localized and biased.
lack of policies that require affordable units in every community
Looking at existing land use, looks like multi-family has historically been concentrated in certain areas (I-30 and Woodhaven is a good example)
low income housing east of south freeway only!
Low income housing seems to be located in various run-down neighborhoods - even newer construction seems to go in these areas.
Many apartments in Southeast Fort Worth
Newer, more affluent neighborhoods refuse to have such erected in close proximity to theirs.
Not certain if this qualifies; but, there don't seem to be many smaller homes or options for those living alone such as empty nesters, young professionals, singles, etc.
only in designated areas set aside by non city employees
overbuilding of large apt complexes in certain locales; also, allowing complexes too large to care for or offer adequate security
Policies that concentrate multi-family housing in limited areas.
Policies that limit the participation and direct involvement of key stakeholders and potential homebuyers.
Question is not clearly defined
Restricting multi-family units
rezone to introduce more apartments into areas of apartment saturation.
see previous answer
Seems strange that FW only approves public housing in way out areas
seems that east Fort Worth has a higher concentration of multi-family living for lower incomes than southwest Fort Worth does
The city should stay out of this.
The government created problems in our cities by creating too many multi-family units. Now I fear they want to do it again. Just look at East Fort Worth and what bad politicians created.
Usually in lower income areas, perceived appropriate areas- east Fort Worth
Yes. Multi-family concentrated in north part of Fort Worth.
Zoning and council initiated rezoning away from multifamily to commerical or single-family. Set backs, density, etc.

Table B.13

Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?

City of Fort Worth
2013 Fair Housing Survey Data

Comments:
again, lower income, perceived appropriate areas- east Fort Worth
Again, these are zoning ordinances and are appropriate. A half-way house for released inmates or group home for the mentally ill has no place on a block with only single family residences. Mixed use and multi-family - fine, single family - no.
Allowing multiple group homes in the same neighborhood is just wrong
And this needs to continue, sorry. In neighborhoods, historic or otherwise, predators buying a house cheap and then tearing it down to build multi family units, solely for self profit, ruins neighborhoods, preys on the poor, and is not community minded
City councils make decisions denying changes in zoning for affordable housing because the neighborhood voters voice strident opposition. Homes/apartments for groups or affordable housing should be permitted in any residential zoning district. This would require a statute or regulation under federal supremacy.
Couldn't buy a property because it was a duplex in an area that was refined single family - added 30K to down payment because underwriter would not write the loan on a cheap 80K house. Walked away from that deal.
Council responding to neighborhoods to deny group housing when permitted by ordinance
Failure of the City of Fort Worth to enforce Zoning Ordinances and Design Guidelines specifically in the Stop Six Community.
For better or worse, zoning, by its very nature, imposes limits. The Mixed Use districts have mitigated the situation to some extent. Any proposed residential use that is not "by right" is subject to whims of the political process.
Group homes are allowed in low-moderate income neighborhoods- seldom in higher income areas.

Group homes are not licensed and charge FMV rents to low income people in need and to veterans.
group homes should be encouraged. there are many individuals who are not capable of living on their own who could live in a supervised home and become productive and loving neighbors.
Have seen this happen in Fort Worth zoning cases
I know that zoning keeps apartment complexes out of my neighborhood.
I'm not aware of specific zoning laws related to group home placement, but would not be surprised, due to the need to address traffic flow, parking requirements, etc.
It seems that law does not protect low income area or restricts zoning to low income areas which allow group homes to be established.
lack of policies that support mixed income housing
Laws that restrict placement of group homes.
My son is in a group home, and has been transferred to several of them. They all seem to be in the same general area, and in the same kind of neighborhood, but I do not know why, other than for the convenience of the company running the homes.
no options for access to public transportation, affordable grocery shopping
None, but our neighborhood requested and was granted single family home zoning. mult-family units were a source of crime in our neighborhood, thank God the city granted.
not a barrier but a good thing
Per newspaper articles. several attempts to locate halfway houses were thwarted by local neighborhood activists.
Residents that pay alot on their mortgage, diffently don't want group homes in their area. Simply because they are threatened.
see above
See above
See above.
see nothing wrong with group homes in limited areas
Single family zoning
The "tiny home" movement is not allowed in the city. these are homes that are less than 400sqft
The areas of town that are inhabited by wealthier people have the resources to battle placement of group homes in their neighborhoods whereas poorer areas do not.
They are not enforced.
We have group home in our neighborhood. There is one close and I know the residents protested and the home was not allowed
What is meant by "group homes". Is that referring to, for example, several mentally handicapped sharing a home with one caretaker? If so, all of them should be stopped! I have heard of caretakers mentally and physically hurting the mentally handicapped. it would be smarter to have a handicapped "orphanage" or "assisted living apartment" where there are multiple workers watching each other as well as those in need.
Yes, I have seen lawsuits about this
Zoning and council initiated rezoning away from multifamily to commerical or single-family
Zoning laws and real estate covenants

Table B.14
Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
again, lower income, perceived appropriate areas- east Fort Worth
Aged houses are being painted over and offered to immigrants instead of being torn down as needed
As a leader, I have noticed over and over that code laws are not enforced in our community. Right across the river, at Crestwood they are enforced right down to the letter of the law. I am having issues with Hispanic landlords exploiting Hispanic families. Code Compliance is worthless.
City codes are not enforced in inter-city neighborhoods.
Code Compliance and Building Codes are being inadequately enforced specifically in the Stop Six community.
Code Compliance is more strictly enforced in some communities in Fort Worth than others.
Code Compliance is not especially proactive, and I suspect that it is understaffed, as well. I am not a member of any of the typical "minorities" but it takes a long time for Code to address problems in my neighborhood. At time, I wonder if their available remedies are potent enough.
Codes being inadequately enforced in immigrant communities. There are too many renters renting garages as living accommodations to illegal immigrants in the south side.
Excessive Number of people allowed to live in rented properties
Fort worth has no way of protecting citizens from houses that have known mold problems or landlords who do not maintain or repair property to assure a healthy environment. No health std for mold.
good idea, but who is going to enforce it. look at college students moving in and ruining the neighborhoods.
Group homes are the worst! The landlords put locks on the refrigerators, pantries, etc. The emergency shelters have locked doors and no exits in some sleep areas making this a complete violation of health and safety codes.
Have seen apartments that would not pass code

Homes and rental properties are of poor quality. Law not adequately enforced.
I have seen where there is more enforcement in newer neighborhoods.
I my neighborhood the people from Mexico rent a house and the next thing you know there are sometimes 7 people living in a small 2 bedroom home. There doesn't appear to be a standard.
I think we should allow individuals to rent out rooms in their houses. as the economy gets tougher and tougher, there is a need for this on the part of the homeowner to in order to stay in their home financially and on the part of the renter who needs an affordable place to stay
If this is happening it is an issue to be addressed within the City Code Enforcement Dept.
Impossible to get our city to issue citations!! We have had issues with garbage, rat/raccoon infested properties, open sewage, etc. And it takes a call to a city councilman to get them to even investigate
In commercial properties where the tenants are immigrants or of a certain ethnic background many health and safety codes are either ignored or not enforced.
Inadequate code enforcement for low-income or housing voucher residents
increased safety risks for homes in low income communities; rarely enforce ordinances
Latino code officers are sometimes too lenient with Latino households regarding Code compliance.
many substandard apartments in low income areas, takes many complaints to get investigated
maximum number of people in a house. Safety issue.
Multiple families are living in one apartment.
Poor code enforcement in minority communities.
recently annexed property in the far north near Jacksboro Hwy
Rental houses, duplexes where the # living in are over the limit
tax dollars collected in poorer areas limit resources that can be devoted to non-violent, largely an intangible economic loss
the city code enforcement on the east side is weak. Many buildings need to be condemned and demolished.
The neighborhood agreed to accept limited multi-family housing if the buildings met code. They did not, and we withheld support for the petition for limited rezoning.
There are a lot of families who pay high rent for low quality homes. There doesn't seem to be enough enforcement requiring landlords to bring homes up to code.
too few code officers to address the problem so why bother in the "bad" neighborhoods
What code enforcement??? Not being done
Yes, code enforcement does not appear to be uniform across the city.
Yes, codes inadequately enforced among large Hispanic populations in neighborhood. Regularly housing too many residents for "single-family" homes. As many as 7 cars parked on street for one home. Individuals marketing food w/o permit (hand carts.) Junk cars kept on premises in violation of storage ordinances. Non-registered or inspected cars parked in drive-ways, side of house, or back yards. Parking on grass. Parking on street facing the "wrong" way. Too many dogs. Dogs left unrestrained. Dogs tethered in back yards. Dogs allowed to run loose.

Table B.15
Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
accessibility, safety incentives would create more diversity in the community, better access by disabled and seniors
Depending on the disability of the person(s). As to how the policy is worded.
Failure of City of Fort Worth to encourage and support participation in tax incentives for Black Historic Districts in the Stop Six community.
Hundreds of miles of roads with public transportation stops have no sidewalks preventing handicap access.
I think the property tax is crazy, I don't think that it is a fair process, If I move to a neighborhood that is more in the color of race that I want then property taxes are very high, the value of my home would go up, but it does depend on race as to whether you pay higher or lower.....Honestly I think it's all over priced as it is and would like to see it be reduced, funds spent wisely, and a better quality of living for people that have a job pay our taxes. Too many times I see immigrants getting federal funding dollars, living off of hard working, tax paying citizens, case in point yesterday I was shopping for school clothes in Hollister and see a lady that cleans our office, she is shopping there too with her kids, and I know for a fact that she is getting federal assistance, as a matter of fact she told me of a story where one relative from Mexico was pregnant she came here received some prenatal care, found out that the child has down syndrome went back to Mexico, then came back to the US just in time to have her child her. So now our tax dollars are taking care of the child and the mother gets to come live in the US.....But I have been a single mother of two boys, I work have a good job, make way more money than I would to qualify for federal assistance, but not as much as it cost to send my boys to college. I budget my money, I would like to see this country change its policies. Stop helping people take advantage of the people who work. They know the system and they know how to work it.... People are so bold, that they put up YouTube videos of how to work the system. It is a shame! Help those who help themselves.
I'm not aware of any tax incentives for making reasonable accommodations or modifications for the disabled.
If there are incentives for making modifications to accommodate the disabled I am not aware of them. I am not going to spend money at my rental property to build ramps and accessible bathrooms.
lack of incentives for affordable housing, especially small projects

Narrow example: If a responsible organization wants to erect an exterior handicapped ramp for a person who uses a wheelchair, the City's various requirements (permits, inspections, possibly variances) could cost more than the materials for the ramp (build with volunteer labor). This is a classic political problem (in the best sense of the word): How to reconcile the need for standards with the desire to help needy, handicapped persons. There's probably a win-win idea somewhere, but I expect that each "side" is entrenched.
Overvaluation in areas in need revitalization
should be left up to the owners of some rental properties such as single family rental property
Taxes are way too high in many minority neighborhoods. Too many slum lords.
Taxing business owners and existing property owners higher and not offering the same exemptions to lower income property owners.
The PHYSICALLY handicapped are forgotten. Especially "partially" handicapped. NEED Transportation !!!!!
The taxes are too high for everyone, particularly older citizens who live on a fixed income.
there are no meaningful incentives for locating a business or housing development on the east side.
We have issues in general, and I have heard of cases where city drastically increases assessments right before a homestead or owner turns 65. Sounds like age discrimination to me

Table B.16
Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
Alternate languages is not the problem. Financial literacy is. I learned Spanish so I could explain the mortgage process to potential Hispanic borrowers. In many cases, even though we were speaking in their mother tongue, the concepts of financial responsibility and literacy were not clearly understood.
English is the language of government. Just ask the IRS! you can get instructions in other languages but all government forms are filed in English
English only.
Failure of City of Fort Worth to require and issue permits for building construction activity. Lack of enforcement/education of requirements, standards, and policies that impact orderly development.
I don't know for sure, but I doubt that we offer all documents in Spanish, and probably very few in Vietnamese. It's hard to know how far to go, but I don't subscribe to the English-only mentality.
If you want to live some where you need to be willing to be like the area not expect the area to change to be like the area you wanted to leave.
In our neighborhood we don't request any building permits to build buildings so no issue here. When reported Code doesn't enforce it. I had an entire house built on Inez st without a single permit--code lady didn't care, she told them next time to file a permit.
Sorry, this is America...everything in English
The permit process should be simplified.
Why would a landlord have to present papers with alternate languages, if the landlord cannot speak the alternate language? Why would a landlord have to rent to a person he cannot carry on a conversation with? If they cannot tell him/her of issues with the house, his property could be ruined.
Yes, I strongly feel the planning and permitting process is a bewildering jungle to anyone outside of the design and construction community. The city needs to make it much easier for first time developers and property owners to conduct business with the city. I am strongly in favor of development ambassadors to work with people who may have limited resources.

Table B.17
Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
Constructors are building too many cheap "cracker box" houses
English only before giving a building permit
Failure of City of Fort Worth to follow, and enforce existing design guidelines specifically in Black Historic Neighborhoods. Specifically, in the Stop Six Community.
How about the run around between Community and Economic Development, Development and Planning, Zoning Board, and the City Council.
I don't know for sure, but I doubt that we offer all documents in Spanish, and probably very few in Vietnamese. It's hard to know how far to go, but I don't subscribe to the English-only mentality.
lack of support and incentives for rehab of existing properties
Making a home seller spend thousands to bring housing up to current code raises the price for the poor and handicapped.
Sometimes the latest "fads" in construction are poorly thought out. As an example, San Francisco was one of the 1st cities requiring

low flush toilets and now requires fire hoses to be hooked up the the sewers to push the waste through because of inadequate water.
The ADA codes are poorly written and confusing. There are even ADA experts which make their living giving ADA advice. The laws should be simplified.
The building code is the code, use it
The regulations are very confusing.
The rules change too often and communities often have to make costly changes too often.
There is neither a lack of guidelines nor are they confusing as applied to multi-family housing. I do not think it appropriate that a private developer be required to build a certain number of single family homes in a housing development or sub-division that are designated for disabled people only. A developer may choose to build accessible homes as the market demands but they should be free to sell them to non-disabled persons if they wish. It would be appropriate to designate a certain number of publicly funded single family housing for disabled only.
Yes, accelerating adoption of the latest and greatest building code drive up construction cost exponentially and kill many deals in historically disadvantaged neighborhoods. Stricter codes that are a minor cost on West 7th for could be extremely cost prohibitive in other areas of the city . These discourage re-development and new development of affordable housing.

Table B.18
Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
Again fear of low income housing development in established neighborhoods will create declining property value and future crime problems. Again unfortunately this has historic reality.
Again, looking at current development in Fort Worth. All attention seems focused on West, far North and Southside. Nothing East. anything that is to be built should go before the neighborhood assoc. of some kind.
Ban HOA's.
City spending exorbitant sums in "preferred" areas such as Magnolia Street corridor, near South side, Fairmount, Hospital district, Rosedale throughway.
Don't pretend the moneyed areas don't do this..
Existing policies in place are not enforced, and policies recommended by community stakeholders are not supported by the Fort Worth City Council.
Failure to maintain streets or follow the long term plan to build streets creates transportation difficulties. Allowing construction while exempting the builder from following city codes.
Fair housing ought to be called that thing that destroys neighborhoods
Fort Worth has several empowerment zones, so I believe they are moving in the right direction. Other areas don't seem to be getting any attention, though.
Fort Worth is allowing traditional neighborhoods of single story small houses to be taken gentrified with new construction unlike existing houses, also overshadowing existing houses; large complexes overshadowing housing (TCU area). Shameful. This further limits accessibility & available housing on bus lines
I see where this is very unfair. All neighborhood are not treated the same. We have lights going in on all the new roads on Bryant Irving, Hulen area but the Como neighborhood has no lights, run down homes that need to be demolished
I wouldn't want to negate progress in urban villages or in-fill development that's cheaper for the city (vs. suburban sprawl), but these could be construed as barriers in some minds.
It seems that there are areas where the houses are trashed and dilapidated and nothing is done, but if these same conditions or violations existed in other areas of the city the homeowners would be fined.
Lack of community development east of south freeway.
lack of incentives for redevelopment of infill or older properties
More incentives are offered to developers in already fast developing areas than in areas in need of redevelopment
No coordinated city and county effort
Not aware of any policies but as before, seems strange where the new housing has been built in recent years. Coincidence??
Not willing to allow other community development to be involved in development housing in the underserve communities. The same developers are giving funds and building smaller multi-family dwellings.
O
only the newer areas of town are considered for new development old neighborhoods are ignored by the city for development projects
Overly restrictive zoning
P
Racism
Really not seeing affordable housing mixed in with higher end housing so there is a true mix of housing in the city.
see 1 & 4 above. The city's "development policy" has been to force all the undesirable activities into a single ghetto.
See above.
See answer written above
see comments above

The absence of policy that prohibits neighborhood organizations from advocating against disenfranchised populations from moving into their neighborhood (e.g., the formerly homeless and disabled)
The City of FW partners with local development organizations on very limited basis to achieve this goal.
The comprehensive plan should alleviate this problem
The quote "poor or minority" neighborhoods receive more favorable treatment than a normal neighborhood. Favorable development policies in "low income" neighborhoods.
There appears to be a lack of political will to support permanent supportive housing outside of the E. Lancaster Ave. area.
We need more senior centers in north Fort Worth there none north of 820.
What is the question? Are you asking can a minimum wage, young, teenage mom, ..wild example ...be given special "money" to build a home in an affluen neighborhood. I think people should buy affordable homes to meet their income. My mother is poor and would never take free handouts. different generation.

Table B.19
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

City of Fort Worth
 2013 Fair Housing Survey Data

Comments:
Absence of public transportation outside Loop I-820
Access to public transportation in the southwest sector of Fort Worth has been impeded in the past and is not currently supported by our City Council representative.
Access to and availability of public transportation
All city services should be available online or via telephone. However, many are not. This is hard on out of town businesses with huge resources. I imagine it is even harder on those that are disabled or lack transportation
Believe city tries to provide a lot of access to those in low income status for employment.
Both of these items aren't offered in alot of area's where isn't any Public Transportation.
Bus service is poor, few employment services
bus services are inadequate - trips require hours that would take only 30 minutes by car
Bus system is mediocre at best.
certain neighborhoods difficult to access via public transportation so some residents may not be able to live there
Currently transportation continues to be a barrier for low income residents which increases concentrated poverty making it difficult to create multi income family housing.
Fort Worth have limited bus service for employment service for Alliance, Grapevine, Westlake Ronake where the jobs are located.
FW has a transportation system???
handicap \ disability
I am only aware of 2 apartment complexes that allowed government services to enter and provide assistance to residents. 1 of 2 was a Section 8 apartment complex and the other non-profit agency that didn't allow vouchers. The Section 8 complex was their first experience to allow government employment services to provide information on employment resources, workforce centers, vocational education, and job opportunities.
I don't think public transportation is not available all over the city.
I think Fort Worth has a serious lack of public transportation. Also have not heard of any workforce development programs.
If a person is trying to attend a vocational school , and not employed at the time there is no housing available especially if that person is male with children.
If they went as far as to provide for all as they do for the under performing it would be a better world for all of us.
If you are in need of services you must either live on the east side or travel to it to access services.
If you count two police officers patrolling 400 square miles at night and it taking forever for response....duh!
If you get a job like at Alliance Airport, not having public transportation. Or anywhere else like this, then you already know that you won't be able to get there.
In the Cavile, Stop 6 area, the roads and public transportation is extremely restrictive of movement and access to public transportation.
Lack of adequate public transportation is a huge barrier for many low-to moderate -income families living in areas w/affordable housing.
Lack of basic city services such as Code Enforcement for the Stop Six community.
Lack of evening and weekend accessibility as most gov. offices are closed at that time; this is particularly difficult when some forms or processes (such as getting water turned on) can only be done in office, not online.
Lack of mass transit such as busses and trains. My son has a problem because the bus will not stop for him at his day hab which is located just off of hwy 80, but considered Benbrook. Such things could affect where he might live and work.
Lack of public transit to educational institutions.
Lack of public transportation to certain areas where jobs are
Lack of reliable, accessible public transportation a regional problem. No healthcare plan sends all indigent to JPS Hospital.
Lack of sidewalks preventing access to bus stops. Lack of transportation services (bus/train) to large areas of Fort Worth.
Lack of transportation assistance for those who are unemployed and can't afford public or private transportation.
Lack of transportation is huge for the homeless population and extremely costly for the disabled for good service. The local city-funded bus service for the disabled as well as the general bus system is very, very unreliable and costly for the homeless or

indigent.
Limited public transportation is a major issue in Fort Worth.
Many barriers exist - limited number of government office locations; certain offices handling only one type of application and the need to go to multiple locations, etc. However, 2-1-1 serves as a telephone portal to multiple state/federal benefits and the 2 Tarrant county Aging & Disability Resource Centers (ADRCs) - accessible by walk-in or phone - can help people navigate services. Low-income working families using United Way's Volunteer Income Tax Assistance (VITA) sites are asked about their need for services, but I'm not sure whether the contractors (Catholic Charities and others) follow up with all these families to assist them to apply.
Many city bus routes exclude outlying counties or cities that are out in the country. Folks often live in the country because its more affordable. I think that the city bus lines should service country roads as well.
Most areas of fort wrth an surrounding areas
need more bus services north of 820 and 35 so people can get to work
need more buses for wheelchair
new employers to the area are locating in areas of the city that do not have public transportation. As a result, persons who need jobs are unable to get there.
No light rail
no signage describing the bus system at bus stops or central areas as in Europe.
nothing more less that are already in place by cities
Poor transit system
Public transportation is limited in Fort Worth and really inadequate
public transit access is insufficient
Public transit in FW is terrible, so yes, this affects citizens' housing choices.
public transportation not available in many neighborhoods or where there are job opportunities for people to access
Public transport is often difficult in Fort Worth. It's not a barrier as such, but a bit of an impediment. The buses in DC run all day long every 15 minutes or so. In Fort Worth, you can wait 45 minutes to an hour for the next bus. Hard to get to work or to assistance offices.
Public transportation could be improved
Public transportation in the City borders on the non-existent. Many City offices are centralized.
Public transportation is abysmal
Public transportation system in Fort Worth is mediocre at best.
The bus service is abysmal. It can take a person half a day to get from their homes to services and back. There really needs to be a better transit system in Fort Worth and the County in general.
the bus system needs to be expanded in Fort Worth. and Arlington should stop living in fear and get public transportation
The City of Fort Worth is a complete scam, municipal court and the police dept same thing. Complete scams. The City is real busy as is criminal defense lawyers using the PD as a money making scam.
The city of Ft. Worth does not provide public transportation in the far north region (Alliance area). Additionally, the surface roads are inadequate to support the populations in the same area. These issues provide barriers to people who depend in whole or part for public transportation services for employment, shopping or other activities.
The entire city suffers from a lack of public transport but I am not certain the demand is there for expansion. Disabled persons already have access to MITS which provides doorside pickup. However I do not know the cost, if any, associated with this service.
The location of homelessness service providers in a dense region that is bound by interstates and lack of bus passes available to people who want to leave the area to search for employment
The mass transit system in the area is very poor which restricts where some people can live if they do not have their own transportation
The T does not have buses north of 820.
the T system limits access to areas of employment throughout Tarrant County
The transit system is subpar and does not appear to be getting better.
There are not buses that run in the outlying areas of the city
There are parts of the city which have no bus service, making it impossible for people who don't own their own cars to reside there: they wouldn't be able to get to and from work.
There is a lack of affordable transportation for seniors and disabled individuals.
There is absolutely no public transportation north of loop 820
There is not good public transportation ANYWHERE in Fort Worth--it is a joke... And the walking and biking is difficult, disjointed, and dangerous
Toll Roads..... are you serious??? This is crazy why should we have to pay money to drive on a road that our government should have put in place a long time ago... this country over taxes us...we pay federal tax, property tax, sales tax, I just paid 62.75 for the tags on my car.....I am thankful for the new road on I20 but it is long over due, and the toll road from Cleburne to Ft Worth but it should not be a toll road. Also why do I have to pay extra to mail in my tags, and if I want to pay for my tags with a debit card they are going to charge me 2.50Wasting money again
Transportation
transportation is a difficult barrier, including time frames from point a to point b
Transportation is difficult for those in poverty. Getting questions answered is also a problem for those without a permanent telephone. Messages left for government services are not always answered in a timely manner.
Transportation needs to be upgraded. Bus service is inadequate.
Try riding the T yourself. It can take up to 2 hours to get downtown to do anything if you live outside the core and have to change buses. The T is awful for a major city. And, since most of the job growth is in the Alliance airport area and most of the poor live in

the center city, how do they get to the jobs?
We have more than enough buses. We should remove some of the buses and create Commuter direct buses to create employment opportunities. For example commuters won't stop at 30 stops on the way to work, but if we have buses that run from S and N Fort Worth to downtown at 7:15am and return at 5:15pm we can run buses that create economic benefits for everyone.
When current buses become obsolete, increase the number of buses and reduce the size of the buses by half. Increase the number of bus stops to make the walk accomindating for handicapped as well as rich and poor. If the bus stop is convenient, the elderly would not worry about dogs, thuds, etc.. Create bus stops next to busy streets attractive so that customers feel "special" instead of sittin out in the spotlight. Instead of a single bench in the sun, make them cute, gazebo style

Table B.20

Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?

City of Fort Worth
2013 Fair Housing Survey Data

Comments:
Apt complexes refusing to give back deposits to applicants if their credit report is declined.
Clients seeking housing assistance is limited since Section 8 assistance is limited.
Code Compliance
Design standards essentially eliminate building homes for lower income people. Using the design/building standard the city has put in place essentially make it impossible to build any new home for less than \$70,000 cost. How many homes in Stop 6 are \$70,000+ homes? Therefore there will continue to be vacant lots. There should be creative solutions for this problem.
don't know of any, but probably should be more in some areas and less in others set up by the neighborhood assoc.
employment
Excessive taxation and regulation hurts the jobs market and forces poverty on more people, thereby limiting their ability to improve their housing.
FWHA is inaccessible due to attitude and prejudice. Staff do not answer questions fully, do not offer options, do not clarify
How about a sound economic policy shift where workers have more options....ie jobs.
I'm not sure if there are barriers but would like to know when it comes to a Fort Worth Human Relation Commission investigator that did a poor job when investigating my 2011 complaint, I suspect it may be a conflict of interest since Tarrant County Housing still hires Pace Realty and owns the property where I use to reside. I would like someone to contact me so I can expand to discuss the incident
My only area of concern, is the income calculation of the Mortgage Credit Certificate, (an unrealized benefit) being included as an "offset" to the PITI for the City of Fort Worth's HAP DPA program in the ratio calculation. This is a future benefit, a "tax credit", and may penalize a potential homebuyer in its current administrative application, which in detrimental to its intended use.
People with a criminal background, in particular felony charges, are often disqualified from housing assistance programs.
Perceive that it is difficult to keep up with demand due to the fast pace of growth and development in FW and north Texas.
See answers 1, 3, 4, 7 and 8 above
The continued lack of investment and revitalization in the Stop Six community.
The lack of code enforcement and police protection
Too numerous to list here...
we should have more online interaction and not be charged extra.
What I notice is private homes being sold without any signs going up.
Zoning ordinances

C. ADDITIONAL HMDA DATA

Table C.1
Owner-Occupied Home Purchase Loan Applications by Loan Type

City of Fort Worth
2004–2011 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
Conventional	23,379	32,000	36,310	27,678	11,350	7,522	5,938	5,561	149,738
FHA - Insured	8,720	7,365	6,600	7,436	11,373	11,619	10,201	8,860	72,174
VA - Guaranteed	1,263	1,236	1,281	1,262	1,675	1,807	1,633	1,624	11,781
Rural Housing Service or Farm Service Agency	6	2	4	13	34	168	318	240	785
Total	33,368	40,603	44,195	36,389	24,432	21,116	18,090	16,285	234,478

Table C.2
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant

City of Fort Worth
2004–2011 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Originated	129	143	146	96	52	53	56	43	718
	Denied	52	50	48	34	20	18	15	16	253
	Denial Rate	28.7%	25.9%	24.7%	26.2%	27.8%	21.1%	21.1%	27.1%	26.1%
Asian	Originated	549	672	675	554	353	301	277	249	3,630
	Denied	92	147	140	121	97	89	77	55	818
	Denial Rate	14.4%	17.9%	17.2%	17.9%	21.6%	22.8%	21.8%	18.1%	18.4%
Black	Originated	1,608	2,110	2,269	1,482	832	622	654	488	10,065
	Denied	656	987	913	689	369	291	223	168	4,296
	Denial Rate	29.0%	31.9%	28.7%	31.7%	30.7%	31.9%	25.4%	25.6%	29.9%
White	Originated	10,850	13,846	14,617	12,255	8,608	6,868	6,111	5,533	78,688
	Denied	2,139	2,596	2,398	2,031	1,422	1,016	1,134	884	13,620
	Denial Rate	16.5%	15.8%	14.1%	14.2%	14.2%	12.9%	15.7%	13.8%	14.8%
Not Available	Originated	2,246	2,215	2,610	1,675	1,040	809	723	701	12,019
	Denied	824	784	849	545	285	246	243	255	4,031
	Denial Rate	26.8%	26.1%	24.5%	24.5%	21.5%	23.3%	25.2%	26.7%	25.1%
Not Applicable	Originated	153	27	4	3	4	1	2	0	194
	Denied	32	1	1	0	1	1	0	1	37
	Denial Rate	26.8%	26.1%	24.5%	24.5%	21.5%	23.3%	25.2%	26.7%	16.0%
Total	Originated	15,535	19,013	20,321	16,065	10,889	8,654	7,823	7,014	105,314
	Denied	3,795	4,565	4,349	3,420	2,194	1,661	1,692	1,379	23,055
	Denial Rate	19.6%	19.4%	17.6%	17.6%	16.8%	16.1%	17.8%	16.4%	18.0%
Non-Hispanic	Originated	9,764	13,687	14,380	11,710	8,150	6,602	5,924	5,362	75,579
	Denied	2,157	2,836	2,590	2,139	1,370	1,050	1,059	835	14,036
	Denial Rate	18.1%	17.2%	15.3%	15.4%	14.4%	13.7%	15.2%	13.5%	15.7%
Hispanic	Originated	2,530	3,198	3,661	2,831	1,747	1,246	1,201	1,041	17,455
	Denied	762	970	1,056	814	574	372	396	303	5,247
	Denial Rate	23.1%	23.3%	22.4%	22.3%	24.7%	23.0%	24.8%	22.5%	23.1%

Table C.3
Loan Applications by Selected Action Taken by Gender of Applicant

City of Fort Worth
2004–2011 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	Total
Male	Originated	10,229	12,285	12,934	10,539	7,397	5,755	5,138	4,766	69,043
	Denied	2,229	2,670	2,496	1,959	1,358	1,011	1,017	809	13,549
	Denial Rate	17.9%	17.9%	16.2%	15.7%	15.5%	14.9%	16.5%	14.5%	16.4%
Female	Originated	4,616	5,900	6,355	4,780	2,923	2,476	2,250	1,882	31,182
	Denied	1,305	1,561	1,448	1,222	692	519	551	447	7,745
	Denial Rate	22.0%	20.9%	18.6%	20.4%	19.1%	17.3%	19.7%	19.2%	19.9%
Not Available	Originated	688	809	1,028	743	543	417	432	366	5,026
	Denied	257	333	404	239	136	129	123	122	1,743
	Denial Rate	27.2%	29.2%	28.2%	24.3%	20.0%	23.6%	22.2%	25.0%	25.7%
Not Applicable	Originated	2	19	4	3	26	6	3	0	63
	Denied	4	1	1	0	8	2	1	1	18
	Denial Rate	66.7%	5.0%	20.0%	.0%	23.5%	25.0%	25.0%	100.0%	22.2%
Total	Originated	15,535	19,013	20,321	16,065	10,889	8,654	7,823	7,014	105,314
	Denied	3,795	4,565	4,349	3,420	2,194	1,661	1,692	1,379	23,055
	Denial Rate	19.6%	19.4%	17.6%	17.6%	16.8%	16.1%	17.8%	16.4%	18.0%

Table C.4
Loan Applications by Income of Applicant: Originated and Denied

City of Fort Worth
2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Loan Originated	70	53	54	42	26	20	17	16	298
	Application Denied	89	76	54	50	30	29	38	12	378
	Denial Rate	56.0%	58.9%	50.0%	54.3%	53.6%	59.2%	69.1%	42.9%	55.9%
\$15,001–\$30,000	Loan Originated	1,385	1,372	1,183	1,134	654	605	622	487	7,442
	Application Denied	711	734	544	505	355	253	331	228	3,661
	Denial Rate	33.9%	34.9%	31.5%	30.8%	35.2%	29.5%	34.7%	31.9%	33.0%
\$30,001–\$45,000	Loan Originated	3,389	3,653	3,665	2,733	1,798	1,717	1,400	1,179	19,534
	Application Denied	1,010	1,045	1,060	773	502	409	399	333	5,531
	Denial Rate	23.0%	22.2%	22.4%	22.0%	21.8%	19.2%	22.2%	22.0%	22.1%
\$45,001–\$60,000	Loan Originated	3,425	4,225	4,142	3,216	2,157	1,880	1,635	1,406	22,086
	Application Denied	848	1,014	967	706	443	345	301	263	4,887
	Denial Rate	19.8%	19.4%	18.9%	18.0%	17.0%	15.5%	15.5%	15.8%	18.1%
\$60,001–\$75,000	Loan Originated	2,399	3,081	3,167	2,381	1,740	1,265	1,144	1,010	16,187
	Application Denied	433	552	541	388	270	193	187	186	2,750
	Denial Rate	15.3%	15.2%	14.6%	14.0%	13.4%	13.2%	14.0%	15.6%	14.5%
Above \$75,000	Loan Originated	4,493	6,029	7,213	6,152	4,380	3,084	2,945	2,853	37,149
	Application Denied	605	969	1,045	880	549	383	391	322	5,144
	Denial Rate	11.9%	13.8%	12.7%	12.5%	11.1%	11.0%	11.7%	10.1%	12.2%
Data Missing	Loan Originated	374	600	897	407	134	83	60	63	2,618
	Application Denied	99	175	138	118	45	49	45	35	704
	Denial Rate	20.9%	22.6%	13.3%	22.5%	25.1%	37.1%	42.9%	35.7%	21.2%
Total	Loan Originated	15,535	19,013	20,321	16,065	10,889	8,654	7,823	7,014	105,314
	Application Denied	3,795	4,565	4,349	3,420	2,194	1,661	1,692	1,379	23,055
	Denial Rate	19.6%	19.4%	17.6%	17.6%	16.8%	16.1%	17.8%	16.4%	18.0%

Table C.5
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied

City of Fort Worth
 2004–2011 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	4	58	133	161	108	229	25	718
	Application Denied	2	53	71	55	26	42	4	253
	Denial Rate	33.3%	47.7%	34.8%	25.5%	19.4%	15.5%	13.8%	26.1%
Asian	Loan Originated	13	234	732	831	556	1,138	126	3,630
	Application Denied	15	120	174	171	73	235	30	818
	Denial Rate	53.6%	33.9%	19.2%	17.1%	11.6%	17.1%	19.2%	18.4%
Black	Loan Originated	29	781	2,549	2,616	1,652	2,283	155	10,065
	Application Denied	48	746	1,164	1,000	520	711	107	4,296
	Denial Rate	62.3%	48.9%	31.3%	27.7%	23.9%	23.7%	40.8%	29.9%
White	Loan Originated	215	5,788	14,056	16,016	11,805	29,013	1,795	78,688
	Application Denied	245	2,146	3,184	2,792	1,658	3,262	333	13,620
	Denial Rate	53.3%	27.0%	18.5%	14.8%	12.3%	10.1%	15.6%	14.8%
Not Available	Loan Originated	37	555	2,027	2,434	2,025	4,458	483	12,019
	Application Denied	68	590	932	857	468	889	227	4,031
	Denial Rate	64.8%	51.5%	31.5%	26.0%	18.8%	16.6%	32.0%	25.1%
Not Applicable	Loan Originated	0	26	37	28	41	28	34	194
	Application Denied	0	6	6	12	5	5	3	37
	Denial Rate	%	18.8%	14.0%	30.0%	10.9%	15.2%	8.1%	16.0%
Total	Loan Originated	298	7,442	19,534	22,086	16,187	37,149	2,618	105,314
	Application Denied	378	3,661	5,531	4,887	2,750	5,144	704	23,055
	Denial Rate	55.9%	33.0%	22.1%	18.1%	14.5%	12.2%	21.2%	18.0%
Non-Hispanic	Loan Originated	150	3,152	12,425	16,055	12,159	30,002	1,636	75,579
	Application Denied	173	1,743	3,140	3,086	1,848	3,688	358	14,036
	Denial Rate	53.6%	35.6%	20.2%	16.1%	13.2%	10.9%	18.0%	15.7%
Hispanic	Loan Originated	110	3,747	5,035	3,536	1,917	2,576	534	17,455
	Application Denied	144	1,384	1,536	1,035	455	566	127	5,247
	Denial Rate	56.7%	27.0%	23.4%	22.6%	19.2%	18.0%	19.2%	23.1%

Table C.6
Loans by Loan Purpose by HAL Status

City of Fort Worth
 2004–2011 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	Total
Home Purchase	Other	12,933	13,445	14,847	13,824	9,699	8,088	7,636	6,776	87,248
	HAL	2,602	5,568	5,474	2,241	1,190	566	187	238	18,066
	Percent HAL	16.7%	29.3%	26.9%	13.9%	10.9%	6.5%	2.4%	3.4%	17.2%
Home Improvement	Other	1,034	1,070	1,215	1,345	928	450	457	451	6,950
	HAL	200	293	306	235	194	120	63	51	1,462
	Percent HAL	16.2%	21.5%	20.1%	14.9%	17.3%	21.1%	12.1%	10.2%	17.4%
Refinancing	Other	7,684	4,678	2,563	3,154	3,228	7,689	6,442	6,649	42,087
	HAL	1,826	2,011	1,703	1,102	648	498	89	62	7,939
	Percent HAL	19.2%	30.1%	39.9%	25.9%	16.7%	6.1%	1.4%	.9%	15.9%
Total	Other	21,651	19,193	18,625	18,323	13,855	16,227	14,535	13,876	136,285
	HAL	4,628	7,872	7,483	3,578	1,190	566	187	238	27,467
	Percent HAL	17.6%	29.1%	28.7%	16.3%	12.8%	6.8%	2.3%	2.5%	16.8%

Table C.7
Loans by HAL Status by Race/Ethnicity of Borrower

City of Fort Worth
 2004–2011 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	Total
American Indian	Other	105	104	103	78	51	50	55	42	588
	HAL	24	39	43	18	1	3	1	1	130
	Percent HAL	18.6%	27.3%	29.5%	18.8%	1.9%	5.7%	1.8%	2.3%	18.1%
Asian	Other	485	531	541	506	328	290	270	247	3,198
	HAL	64	141	134	48	25	11	7	2	432
	Percent HAL	11.7%	21.0%	19.9%	8.7%	7.1%	3.7%	2.5%	.8%	11.9%
Black	Other	1,133	960	1,126	1,110	687	583	652	484	6,735
	HAL	475	1,150	1,143	372	145	39	2	4	3,330
	Percent HAL	29.5%	54.5%	50.4%	25.1%	17.4%	6.3%	.3%	.8%	33.1%
White	Other	9,196	10,293	11,218	10,687	7,691	6,394	5,946	5,317	66,742
	HAL	1,654	3,553	3,399	1,568	917	474	165	216	11,946
	Percent HAL	15.2%	25.7%	23.3%	12.8%	10.7%	6.9%	02.7%	03.9%	15.2%
Not Available	Other	1,891	1,532	1,856	1,442	938	770	711	686	9,826
	HAL	355	683	754	233	102	39	12	15	2,193
	Percent HAL	15.8%	30.8%	28.9%	13.9%	9.8%	4.8%	1.7%	2.1%	18.2%
Not Applicable	Other	123	25	3	1	4	1	2	2	159
	HAL	30	2	1	2	0	0	0	0	35
	Percent HAL	19.6%	7.4%	25.0%	66.7%	.0%	.0%	.0%	%	18.0%
Total	Other	12,933	13,445	14,847	13,824	9,699	8,088	7,636	6,776	87,248
	HAL	2,602	5,568	5,474	2,241	1,190	566	187	238	18,066
	Percent HAL	16.7%	29.3%	26.9%	13.9%	10.9%	6.5%	2.4%	3.4%	17.2%
Non-Hispanic	Other	8,204	9,942	10,891	10,270	7,423	6,234	5,793	5,233	63,990
	HAL	1,560	3,745	3,489	1,440	727	368	131	129	11,589
	Percent HAL	16.0%	27.4%	24.3%	12.3%	8.9%	5.6%	2.2%	2.4%	15.3%
Hispanic	Other	1,844	1,980	2,345	2,231	1,383	1,085	1,154	944	12,966
	HAL	686	1,218	1,316	600	364	161	47	97	4,489
	Percent HAL	27.1%	38.1%	35.9%	21.2%	20.8%	12.9%	3.9%	9.3%	25.7%

Table C.8
Rates of HALs by Income of Borrower

City of Fort Worth
 2004–2011 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	Average
\$15,000 or Below	38.6%	37.7%	35.2%	16.7%	30.8%	25.0%	5.9%	012.5%	29.9%
\$15,001–\$30,000	25.3%	38.2%	36.6%	21.6%	27.2%	11.7%	3.9%	9.4%	25.1%
\$30,001–\$45,000	20.5%	34.7%	31.8%	17.1%	14.6%	6.6%	1.9%	3.8%	20.7%
\$45,001 –\$60,000	17.3%	33.9%	30.5%	14.8%	11.1%	5.2%	.9%	2.9%	18.8%
\$60,001–\$75,000	16.1%	28.3%	25.5%	12.7%	9.5%	5.5%	1.5%	1.1%	16.3%
Above \$75,000	11.2%	21.5%	20.4%	9.9%	7.5%	6.7%	3.5%	3.3%	12.4%
Data Missing	12.8%	25.8%	34.4%	32.4%	5.2%	1.2%	0.0%	0.0%	24.9%
Average	16.7%	29.3%	26.9%	13.9%	10.9%	6.5%	02.4%	03.4%	17.2%

Table C.9
Loans by HAL Status by Income of Borrower

City of Fort Worth
 2004–2011 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	Total
\$15,000 or Below	Other	43	33	35	35	18	15	16	14	209
	HAL	27	20	19	7	8	5	1	2	89
	Percent HAL	38.6%	37.7%	35.2%	16.7%	30.8%	25.0%	5.9%	012.5%	29.9%
\$15,001–\$30,000	Other	1,035	848	750	889	476	534	598	441	5,571
	HAL	350	524	433	245	178	71	24	46	1,871
	Percent HAL	25.3%	38.2%	36.6%	21.6%	27.2%	11.7%	3.9%	9.4%	25.1%
\$30,001–\$45,000	Other	2,695	2,385	2,498	2,265	1,536	1,603	1,373	1,134	15,489
	HAL	694	1,268	1,167	468	262	114	27	45	4,045
	Percent HAL	20.5%	34.7%	31.8%	17.1%	14.6%	6.6%	1.9%	3.8%	20.7%
\$45,001 – \$60,000	Other	2,832	2,794	2,878	2,739	1,918	1,782	1,621	1,365	17,929
	HAL	593	1,431	1,264	477	239	98	14	41	4,157
	Percent HAL	17.3%	33.9%	30.5%	14.8%	11.1%	5.2%	.9%	2.9%	18.8%
\$60,001–\$75,000	Other	2,013	2,210	2,358	2,079	1,574	1,196	1,127	999	13,556
	HAL	386	871	809	302	166	69	17	11	2,631
	Percent HAL	16.1%	28.3%	25.5%	12.7%	9.5%	5.5%	01.5%	1.1%	16.3%
Above \$75,000	Other	3,989	4,730	5,740	5,542	4,050	2,876	2,841	2,760	32,528
	HAL	504	1,299	1,473	610	330	208	104	93	4,621
	Percent HAL	11.2%	21.5%	20.4%	9.9%	7.5%	6.7%	3.5%	3.3%	12.4%
Data Missing	Other	326	445	588	275	127	82	60	63	1,966
	HAL	48	155	309	132	7	1	0	0	652
	Percent HAL	12.8%	25.8%	34.4%	32.4%	5.2%	1.2%	0.0%	.0%	24.9%
Total	Other	12,933	13,445	14,847	13,824	9,699	8,088	7,636	6,776	87,248
	HAL	2,602	5,568	5,474	2,241	1,190	566	187	238	18,066
	Percent HAL	16.7%	29.3%	26.9%	13.9%	10.9%	6.5%	2.4%	3.4%	17.2%

D. CRA DATA FOR THE CITY OF FORT WORTH

Table D.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI

City of Fort Worth

2000 - 2011 Community Reinvestment Act Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	1,631	2,372	2,688	1,692	0	8,383
2001	2,217	3,323	3,636	2,020	0	11,196
2002	1,956	3,315	3,522	2,218	0	11,011
2003	1,033	5,047	4,354	3,117	0	13,551
2004	989	5,077	4,588	3,312	0	13,966
2005	1,045	4,761	4,794	3,759	0	14,359
2006	1,550	7,194	7,834	6,378	0	22,956
2007	1,721	7,600	9,037	7,378	0	25,736
2008	1,258	5,910	6,838	6,014	0	20,020
2009	716	3,462	2,938	2,470	0	9,586
2010	467	2,366	2,732	2,405	0	7,970
2011	673	2,844	3,399	3,123	0	10,039
Total	15,256	53,271	56,360	43,886	0	168,773
Loan Amount (\$1,000s)						
2000	21,804	26,746	27,915	19,830	0	96,295
2001	24,621	31,872	29,998	19,910	0	106,401
2002	23,417	32,205	29,144	22,173	0	106,939
2003	11,263	60,105	40,767	30,907	0	143,042
2004	11,951	63,701	48,849	36,870	0	161,371
2005	13,334	62,637	51,760	44,790	0	172,521
2006	15,859	76,501	75,690	65,011	0	233,061
2007	19,518	94,291	93,417	83,581	0	290,807
2008	14,825	74,303	73,210	65,566	0	227,904
2009	8,512	44,584	35,912	33,133	0	122,141
2010	7,027	36,740	34,932	31,112	0	109,811
2011	10,959	43,009	39,437	37,106	0	130,511
Total	183,090	646,694	581,031	489,989	0	1,900,804

Table D.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI

City of Fort Worth
 2000 - 2011 Community Reinvestment Act Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	78	55	58	51	0	242
2001	83	82	53	71	0	289
2002	94	70	60	62	0	286
2003	30	174	93	90	0	387
2004	27	169	96	96	0	388
2005	29	187	101	76	0	393
2006	28	173	125	75	0	401
2007	33	221	118	115	0	487
2008	31	221	103	103	0	458
2009	28	176	95	72	0	371
2010	25	177	95	89	0	386
2011	27	165	97	84	0	373
Total	513	1,870	1,094	984	0	4,461
Loan Amount (\$1,000s)						
2000	15,019	9,507	9,584	9,161	0	43,271
2001	15,394	13,699	9,347	12,696	0	51,136
2002	16,740	11,465	10,404	10,702	0	49,311
2003	5,207	31,501	16,743	15,716	0	69,167
2004	4,860	30,481	16,849	17,274	0	69,464
2005	5,260	34,209	18,848	13,104	0	71,421
2006	4,962	31,705	21,476	12,552	0	70,695
2007	5,634	39,177	20,543	19,381	0	84,735
2008	5,813	39,247	18,541	18,118	0	81,719
2009	5,134	32,241	16,992	12,640	0	67,007
2010	4,428	32,493	16,650	15,346	0	68,917
2011	4,795	29,871	16,533	14,180	0	65,379
Total	93,246	335,596	192,510	170,870	0	792,222

Table D.3
Small Business Loans Originated: More than \$250,000 by Tract MFI

City of Fort Worth
 2000 - 2011 Community Reinvestment Act Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	91	49	48	26	0	214
2001	94	72	47	46	0	259
2002	96	64	59	43	0	262
2003	37	162	80	66	0	345
2004	27	207	103	77	0	414
2005	35	210	116	80	0	441
2006	23	201	97	76	0	397
2007	41	285	132	113	0	571
2008	38	268	130	96	0	532
2009	27	207	122	78	0	434
2010	21	235	104	89	0	449
2011	22	227	115	85	0	449
Total	552	2,187	1,153	875	0	4,767
Loan Amount (\$1,000s)						
2000	57,080	28,753	25,267	12,467	0	123,567
2001	55,820	38,132	25,289	24,595	0	143,836
2002	55,262	33,510	34,699	20,856	0	144,327
2003	19,628	85,949	44,137	35,829	0	185,543
2004	12,658	111,129	52,800	42,373	0	218,960
2005	18,751	117,092	63,683	42,568	0	242,094
2006	12,091	110,256	50,985	41,127	0	214,459
2007	21,523	154,612	79,456	59,236	0	314,827
2008	22,006	147,332	75,746	51,184	0	296,268
2009	14,862	120,462	70,387	45,252	0	250,963
2010	12,151	133,299	57,555	48,239	0	251,244
2011	12,549	129,881	65,852	46,722	0	255,004
Total	314,381	1,210,407	645,856	470,448	0	2,641,092

Table D.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than \$1 Million by Tract MFI

City of Fort Worth

2000 - 2011 Community Reinvestment Act Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	571	719	1,002	714	0	3,006
2001	1,008	1,240	1,808	1,019	0	5,075
2002	571	775	996	710	0	3,052
2003	340	1,707	1,640	1,286	0	4,973
2004	317	1,642	1,628	1,268	0	4,855
2005	437	2,038	2,315	1,900	0	6,690
2006	554	2,555	3,248	2,717	0	9,074
2007	579	2,915	3,827	3,064	0	10,385
2008	390	1,845	2,341	2,083	0	6,659
2009	262	1,206	1,172	964	0	3,604
2010	199	997	1,238	1,076	0	3,510
2011	364	1,288	1,701	1,636	0	4,989
Total	5,592	18,927	22,916	18,437	0	65,872
Loan Amount (\$1,000s)						
2000	25,928	22,534	31,841	20,492	0	100,795
2001	30,497	27,982	34,580	33,218	0	126,277
2002	26,304	26,375	30,362	23,404	0	106,445
2003	12,751	63,866	43,879	40,766	0	161,262
2004	11,812	66,146	48,653	39,303	0	165,914
2005	14,808	70,268	58,358	44,832	0	188,266
2006	10,715	79,544	68,174	59,928	0	218,361
2007	14,893	87,869	75,352	68,681	0	246,795
2008	14,866	74,906	63,481	55,721	0	208,974
2009	9,438	54,844	48,114	40,531	0	152,927
2010	8,836	54,309	42,945	40,388	0	146,478
2011	10,251	61,082	47,213	42,411	0	160,957
Total	191,099	689,725	592,952	509,675	0	1,983,451

E. FOCUS GROUP MINUTES

DEVELOPMENT PROCESS

(Introductions)

(Presentation)

Comment 1: I am involved in the inner city urban area that was completely derelict. Twenty years ago the city and the hospital, which is a major employer in the area decided to do something about it. When I first got there, we were still identifying crack houses and prostitutes. We are actually trying to gentrify the area. You could say that what it is resulting in is Black persons and Hispanics moving out. We would like an integrated result, but the difficulty we face is what it is like to replace truly substandard housing with quality housing that can be affordable across several economic levels. That is the difficulty I face. To me a part of the problem is I do not want to be building tomorrows ghettos today. I actually avoid development projects for first time home buyer project homes, which are basically tomorrow's ghettos today. I don't have any interest in that. So, another difficulty I face is how do I provide quality housing? Again quality housing meaning insulation systems that are really good insulation systems, tankless hot water heaters where the end result is that those things cost more in the short term, but there is a long term advantage to them in and the savings for the resident in terms of lower utility bills and being more energy efficient.

Comment 2: What price point are you at?

Comment 3: Well I would, like in the near Southside we have all the C class housing we need. Another difficulty I face when doing a project is if I go into a bank and they do a market analysis and I am showing that we can get rents for \$1.25 a foot and they are saying that the only rents you have in your area are 85 cents a foot. So we are not going to lend you the money. So there is another development difficulty. Now every project that I have ever done where we put in that was above or beyond the existing market it either sold or rented before we were done, but you can't tell that to a bank. That is another issue.

Comment 4: When I look at the maps what would be good would be to see income. Why are racial groups staying in the same place? Their incomes have not really changed over that ten year time period. So that is what they can afford. I don't think we live in a society today where there is going to be a lot of subsidized housing in North Fort Worth. That is all going to be higher income housing. You have income issues and with income issues come transportation issues. People do not have good transportation, so they can't live so far out.

Comment 5: I think too that with many of the groups there is community identification. So, they want to stay in the neighborhood where they were reared and they are connected to that neighborhood then some other groups. They tend to stay in that area. Not because they are forced to stay there, but because they want to. I don't think that is a negative at all. The community connection is a very good thing.

Comment 6: I would like to see the income levels that go back to the 60's and see what your map shows. I think it would be different if you had a 1960 map of the white persons. You would see a more inner city darker color. I think over time that they moved out. I don't think it is that the community wants to stay where they are at. I think it goes more to your point of is that the only thing they can afford to live? That is a big impediment for folks to move out of the Southeast side. It is because when you move up north and you get up there it is harder to move

around if you do not have a vehicle. There is not a lot of mass transit up there. I think it is a combination. I think there is something to people wanting to stay because that is where they grew up, but if that is the case that's Southeast side. I always hear stories that used to be a thriving mostly all Anglo neighborhood. It is not anymore. So they moved for some reason.

Comment 7: I am thinking of Como the Northside. Como is predominately ethnic, but folks they want to go back to that community and live there. That is where they grew up. That is where they were raised.

Comment 8: Unfortunately, poverty is not a particular class. When you look at fair housing and you can't bring the economics into it. Unfortunately, there is a direct correlation between poverty and ethnicity. So there are a lot of clearly economic policies that exist and have an impact on the values of houses and rents that exist that impact the choice. I think the market have but is related to an economic issue. It goes back to affordability and quality of houses. Also, there is another correlation of a higher percentage of population in multifamily developments of minority verses single family. So, when you have restrictions with both zoning and political pressure where multifamily goes that has an impact on ethnic minorities having free choice of where to live. Right now I guess the largest source of equity for multifamily is tax credits. We have a qualified action plan by the state that profits tax credits being used in certain areas. There is a whole gamut of things that are economically driven but cannot be traced back to a discriminatory practice against ethnic minorities or gender, but it had the same effect.

Rob Gaudin: I want to emphasize this Analysis of Impediments (AI) can get your arm around the certification that greater than violations to fair housing law. It is that consideration about the spirit of affirmatively furthering fair housing. So please, tell me more about the economic policies that are causing disproportionate burden on some groups more than others.

Comment 9: The state of Texas allocation of tax credits and right now you are limited to a 9 percent allocation if the neighborhood supports that project or that development. If you can't get the neighborhood to support it you are not going to get a tax credit allocation. So any affordable multifamily development is going to get knocked down if the neighborhood doesn't want it. Most neighborhoods in Fort Worth will oppose multifamily being developed, much less an affordable multifamily development in their neighborhood. So the policy that the state has is that it is ok if the neighborhood doesn't want it we are not going to give it to you. I can go over and over the times that applications have been made for tax credits to provide for affordable housing development and it gets knocked down.

Rob Gaudin: Is there adequate zoning for multifamily?

Comment 10: There is lot of multifamily zoning. I do not have the numbers or figures to say what percentage of our city has multifamily zoning. I can get that information for you.

Rob Gaudin: But as far as developable vacant land?

Comment 11: There is a lot of vacant land in the city of Fort Worth. It is not a problem.

Rob Gaudin: So it is zoned?

Comment 12: But if you can't get to finance it, no matter if you own it and get it zoned. If you can't get to financing to construct quality affordable units, you are not going to get it done. If the biggest source of equity for affordable housing is controlled by neighborhoods and their ability to oppose an application, it has an impact on it. Also, I am getting concerned that the city of Fort Worth is working on developing rail service hopefully from Southwest Fort Worth

to the airport. I am hearing discussion of some neighborhoods not wanting multifamily development around the train stations. Well, my understanding of development is that you want high density residential development. That will spur retail development also and have people to walk to those train stations to utilize public transportation, but there is opposition in neighborhoods that we do not want residential development around these train stations.

Comment 13: A lot of the current rails along the southern portion around these areas we just rezoned certain areas for multifamily and mixed uses, denser uses. So from the Summer Creek station to Granbury to Berry stations we have already started the process of rezoning to high density multifamily and mixed uses.

Comment 14: There is opposition from the neighborhood at the Granbury Station.

Comment 15: The zoning is already in place. There was opposition.

Comment 16: There is opposition and politically it may be zoned and permitted there. That is the fact of the political state.

Rob Gaudin: Let me understand this correctly. The Transportation Oriented Development Board (TOD) has higher density allowed along the transportation corridor and it is becoming zoned properly. To what extent would the neighborhood be able to block development in a properly zoned?

Comment 17: I will give you an example. There has been a developer who wanted the Quarles Lumber site which is on Park Place; it is a three acre tract. There is a future proposed station 500 feet to the north. It falls within the near Southside zoning. It falls within the tax increment funding district. The budding neighborhood, actually they are on the other side of the railroad tract, is Berkeley Heights and even though the zoning was in place up to five or six stories, actually they could have gone to ten, the Berkeley Height neighbor association said that we will absolutely, any board member voting funds for that project would be severely opposed for the next election. That is how they did it. They were making phone calls to every TIF board member and they are very organized. It was a significant amount of TIF funds that were necessary for the project because there was infrastructure. TIF funds can only be used to improve public roadway improvement.

Comment 18: They can be used for affordable housing.

Comment 19: Correct. Look at Canby. It can be used only for public right of way infrastructure type improvements. The city is like ok; yes you need to put in two 10 by 10 double box culverts from 8th Avenue from here. It should be an infrastructure issue to begin with, but they used the TIF. The city says that you have TIF money so you can use your TIF funds and without that being done then the project couldn't go forward. Berkeley neighborhood blocked it until they got certain concession like height restrictions, type of materials, quality. "You don't want those people living here."

Comment 20: Who are those?

Comment 21: You know people who rent.

Comment 22: It seems like the impediment from these examples is that the lack of political will plays a big role in Fort Worth.

Rob Gaudin: Those who rent. Who are those?

Comment 23: We tried to demonstrate and what is amazing in Fort Worth is I have been involved in projects where they wanted to get some sort of economic assistance from the city

and we were told that we had to put in 20 percent affordable. The two top tiers; the top 10 percent top tier affordable and then 10 percent the second tier. What is amazing about that is market-rate in our area that would have meant a fireman, a policeman, a nurse. They would have all qualified for the affordable in these projects. They rent so they are those people. That is what we hear.

Rob Gaudin: You had mentioned a minute ago tomorrow's ghettos being constructed today. Where are those being constructed?

Comment 24: To me that is anywhere you are putting up a building. I don't consider myself a developer. This is my third career, my sunset career. I am doing this because I can make a decent enough living and do something that is socially responsible. Most developers do not get their numbers to work in such a way as where they cut the corners is in the quality of construction. West 7th looks great today, but what is that going to look like ten years from now? West 7th is between downtown and the Museum District with all warehouses and ACME Brink had its warehouse there. The some Dallas developers came in and they put in a development out of an instant development. That is what I call it. Add water to development and boom there it is. How many units are there now? 800?

Comment 25: There is not affordable in that area.

Comment 26: They have affordable. All the units that leased up first were affordable units. The top two tiers, but the quality of construction, what is it going to look like ten years from now? Is it going to hold up? We can see another thing. In the near Southside we are pushing for smaller boutique developments and the project that I am doing is 12 units. No, you will not get a swimming pool and no, you will not get a gym, but you will have a place that is quality construction and it won't look like a ghetto ten years or 20 years or 30 years from now. That is my soap box. Sorry.

Roe Gaudin: It sounds like a nice soap box. In your particular situation you are redeveloping and I am assuming that a portion of the buildings were occupied affordable. Where do those folks then move to?

Comment 27: I have more vacant land then we have. There is a little bit of demolition going on, but we have vacant land. If you look at, see where Route 30 and 35 intersect on that map? The near Southside is that left quadrant on the lower left. When you have the whole history of the urban flight to the suburbs, this was the suburbs that everybody from up there moved to and just north of 20. It all began in the 50's when white people started moving to South Hills and then this area right here by the 60's. Another difference I see and I am just talking in general, if you look at between Berry and Seminary which is down in this direction, it is a very Hispanic neighborhood. The difference between that Hispanic neighborhood and let's say north of Berry to like 30 which is the near Southside area, the difference is homeownership. There are more Hispanic people who own their own single family homes south of Berry than north. You just have landlords north of Berry and that is another difference. Homeownership makes a difference.

Rob Gaudin: I have here where the concentration of rentals are. Where do you see future changes?

Comment 28: I think they will be evening out a little bit if we are going to survive the population growth in this area.

Rob Gaudin: This homeownership you will see it dissipating in the north?

Comment 29: We are always going to have people move to suburbia.

Comment 30: What was your method for coming up with that? Right there on that Northeast, north of 30 and right there on 820?

Rob Gaudin: This is all census data.

Comment 31: This says we have no apartments or rentals ten years ago?

Rob Gaudin: The share of households. When I was talking about poverty and disproportionate share, the color scheme in all these maps is the same. The jurisdictions average is 44 percent of all households are renter households. It has gone down a little bit to 40 percent, roughly 41 percent, but 99 percent of all households in these census tracts are renters. Over here it is 99.9. These tracts that are this color can be almost all.

Comment 32: I think the difference between those two maps is not that there is less rental units in 2010 than 2000 is that during that decade there were more single family being built. All those neighborhoods north of that Post Oak Boulevard, there were more single family houses built and the same number of multifamily stayed the same. So the percentage of multifamily decreased, but the number of multifamily did not decrease.

Rob Gaudin: Actually the number of rentals increased by 21,000.

Comment 33: But the number of...

Comment 34: Are you talking about that in one location?

Comment 35: In the city, 6,000 to 7,000.

Comment 36: You can see that.

Comment 37: But the number of single family neighborhoods that developed up in that area in the last ten years.

Comment 38: My point is that we do not have less homes. That brings up your point of what is 7th Street going to look like in 20 or 30 years. To me it is always said is the number of units. There was a council person who used to beat me up about that saying that it was Section 8 and all the problems were with Section 8. At the most were having 7 percent Housing Choice Vouchers. We had no public housing. It was all 7 percent. The problem was they built 4,500 units in one footprint and it couldn't sustain overtime. I have always advocated the way to really get it back to the way that it needs to be is to really tear down 1,500 of them. I bet you could sustain 3,000 there based on their vacancy/occupancy there. So in fact I always look at 7th Street and think what is that going to look like. There has to be ordinances and someone smarter than me to figure out what is going to be the footprint. What is the number that needs to think about 20 years from now to hold it here? It is really going to be a problem because somebody built somewhere else and they all leave and then they have to reduce their rents to get anybody in there. Then they lower their standards and they do not do their maintenance. Then you have a possible Woodhaven situation on your hands. The other thing we talked about earlier was the political will. We don't have it. A blind person can see that we don't have it. When it comes to the neighborhoods coming and saying that we do not want this in our backyard, we have seen it over and over. There is something on east side on Biggs Street recently six months ago where the neighborhood said hey everybody builds on the east side and we don't want that. They are going to rehab an old nursing home and put some homeless or affordable housing in there. The neighborhood gave them hell, so the city council didn't support it. It seems like to me that we ought to have a map like this but only highlight the areas

where we need affordable housing and take and not put them in the lower income areas even though that is not protected class. We don't need, we probably need affordable housing everywhere, but the priority should not be in southeast Fort Worth. The priority should be in other areas. Areas where they are going to come out, where did you say that group that area, Berkeley? That is probably where we ought to start and other areas. What happens is you give those low-income folks a better shot at living the American Dream if you will, with better schools and that kind of thing.

Comment 39: The history of the Berkeley Heights Neighborhood Association was that they were founded in the 1960's. This was a 1920's neighborhood. They actually became a neighborhood association in the 60's and their sole purpose was to prevent multifamily housing in the area.

Comment 40: They are a strong group, but there are a lot of reasons we could argue, but there ought to be more affordable housing, rental or whatever in that location.

Comment 41: Are there a lot of vacant tracts in that area or is it primarily single family?

Comment 42: Berkeley Heights in the 1920's suburban neighborhood and it has never seen an economic decline. It was always a nice quality.

Comment 43: When did Lincoln, it may not be right at Berkeley, but right near that area. That surprised everybody, that there was that much property and someone else built some homes towards TCU right behind that church.

Comment 44: That was one estate there.

Comment 45: We were sad that we couldn't find that. We thought we could never find that property. If you look, you can come up with a property, but I do not think that any developer would try.

Comment 46: Then you get into the price of land.

Comment 47: It is not affordable. That is.

Comment 48: Midtown is an example. The city chooses that property and opted to look at affordable housing there. It is Forrest Park and Rosedale.

Comment 49: Well Berkeley would have never allowed that.

Comment 50: It is a successful development right now, high end development. Part of it could have been parceled out for affordable housing.

Comment 51: I don't think it has a multifamily component. It just has a couple of hotels.

Comment 52: It could have, right.

Comment 53: That was a botched deal in so many ways.

Comment 54: There is opportunity. My opinion is that what is lacking, the biggest impediment is the lack of a good fair housing plan for the city of Fort Worth. There isn't one. A few years ago the mayor appointed an Affordable Housing Task Force, which Alex chaired and it met for a year and a half. The results were stashed away.

Comment 55: You mean the mayor's commission on Affordable Housing and quality affordable assessed plots.

Comment 56: Yes.

Comment 57: I think I said in a group the other day and just to give our consultant context. What happened is our primary source of funding is from HUD and we ran across all sorts of compliance issues and our funding was at risk. I think one of the things that happened was that the whole orientation of the program became we need to follow HUD rules.

Comment 58: We need a plan.

Comment 59: I am just trying to put it in context. I am not saying that you are wrong, but if somebody is trying to take your money away completely. I am sorry to be defensive.

Comment 60: When you deal with HUD and I was chair of the Housing Authority, I used to tell people that if you have an idea and it makes a lot of sense and it is logical and it is a damn good idea, there is a rule against it.

(Laughter)

Comment 61: When I got home and talked about shop I was a VP at TCU and I heard from the housing Authority was you can't do that. You can't do that. Why can't we do it?

Rob Gaudin: I want to emphasis something here; we are confusing a little bit of housing affordability and plan for production that is different than a fair housing plan.

Comment 62: But I stated there is a correlation between all those rules of forward economics and fair housing because of the number, the percentage of ethnic minorities and females who are on the lower side of the economic scale. So all those economic policy has an impact on those protected classes. Classical one can defend it by saying that it is an economic decision, not a racial decision.

Rob Gaudin: Unless there is disparate impact.

Comment 63: Are you saying there is a difference verses affordable housing?

Rob Gaudin: Income or source of income is not protected. So, some economic decisions can be made exactly as you suggest.

Comment 64: That is where experts like you are needed to help us identify.

Rob Gaudin: We do need to consider actions, omissions, or decisions that affect or have the effect of restricting housing choice. These things you are talking about have the effect. This not against the law, but how is it effect affirmatively furthering fair housing. It is a larger subject. For example I have here Community Reinvestment Act Data.

(Presentation)

Comment 65: What are the dots, the purple dots?

Rob Gaudin: These are employment training centers. They are correlated somewhat more with higher incidences of poverty.

(Presentation)

Comment 66: I was saying about HUD, The Housing Authority owns a 10 story building downtown. It used to be a 225 housing unit for elderly and disabled. It was vacated four years ago due to an infestation of bedbugs. All the renters were located to locations of their choice with vouchers and so the Housing Authority was left with what do we do with this building? So a plan was developed to do a mixed income development and then build it, 70 percent affordable and 30 percent market-rate. It took us two years to convince HUD that it was a good idea. Two years. That is an impediment with HUD policies.

Rob Gaudin: You are not the first to say that.

Comment 67: I know. It took both of our congressional people to call HUD before we got their attention. We have got to come up with a solution.

Comment 68: The Housing Authority, we will stick to it. We will keep hammering away. We have to figure out how to do it and we would. It would take forever, but we would stay with it, because we didn't have anywhere else to go. The developer is not going to do that. They can't afford it. We can't afford it either, but we were volunteers or we were working at it. There is a whole, like the Ripley Autumn. Do you know where Ripley Autumn was?

Comment 69: I have been living in Fort Worth for 15 years and I am pretty blinded to...

Comment 70: You know that Radio Shack campus? That was Ripley Autumn. What we had to do, the Housing Authority and this is what they are doing now for Cavile in East Fort Worth and that is why I support that. We had to come up with a development plan to present to HUD if we could sell Ripley. So we developed it. We had to have meetings like this. We had to have stakeholders and we spent like \$300,000 to get that done. We had all kinds of experts look at that. We threw in their Hunter, Ripley, and Cavile that if we sold any one of these three that we would disperse and replace every one of those units, but in different locations in the city. We got that approved and it took us at least two years to go through that process. It may have taken three accounting the time it took HUD to give us the approval. It took three. Then we got the approval that we could sell any of those three because HUD owned the property and we couldn't sell it without their approval. That is when Radio Shack, we got their approval in February and Radio Shack came to us and said that they would like to purchase that property. If we had not had that plan we would have had to say could you wait three years so we can go through this process, but we had it done. Now they are doing the same thing with Cavile and we need to do that. When we developed that plan we had no idea that if we would ever sell one or implement that plan.

Comment 71: You guys went through Hecht in relocating folks because it was classic NIMBYism.

Comment 72: I wanted to lay that foundation for you because we fought for properties and we were doing real well until which property?

Comment 73: Stonegate.

Comment 74: Stonegate Apartments and that was the only one that we had bought out right without using tax credits. We didn't even have to have a public hearing, but we were going to have them. We bought it and there were 31 people that bid on that property, but we weren't the high bidder. We weren't even in the top five. I remember it came back telling us that we don't have it and we probably won't get it because we are not I the top five. I said go back and tell them that we will give them \$300,000 firm money. Hard money and then 30 days later they came back to us and said if you are still interested because the other guys fell out. We said Hecht yeah. It was a Hecht of a deal for us. They had a confidentially agreement. Do you remember?

Comment 75: Yes.

Comment 75: They said they you cannot tell anybody that we are selling you this property. We talked to some of the council people and this is what we are doing, but you can't tell anybody. We have this confidentially agreement and we do not want to lose this property. It is a good

deal for us. Then I don't know how the word leaked out, but it leaked out. The reason, I don't know if you remember any of that?

Comment 76: But I do know.

Comment 77: You remember the hearings and they were so made, but the council did not have the loan on that. We did, the board did. There were some nervous sleepless nights that we had during that time period, but we knew it was a good deal. We knew it would work out. So, we stayed with it and we bought the property and now it is working. My point to that is the will, if the council gets what would they have done.

Comment 78: They would have backed off in a heartbeat.

Comment 79: They would have let it go; we do not need this property. I think that the plan that he refers to, that has got to be part of the plan. You have to take that political pressure off of those officials somehow. You have to do it. There is a way to do it. My plan about highlighting the areas of priority where fair housing or affordable housing could go and this is kind of like our ten year plan, then that is the way to do it. It had input from all the communities, like the Berkeley's of the world and say that this area is an area where we can put housing or multifamily house, but it has to get to that point.

Comment 80: I think that there is part of what you are hearing as an outside consultant and I am a damn Yankee and I moved from the Northeast in 77 to Dallas and lived in Dallas for 30 years.

Comment 81: Two strokes.

(Laughter)

Comment 82: And 15 years ago when I moved here. One of the interesting things that I learned about Fort Worth is there is this interesting dichotomy at one hand and we special thing in the city. You have some of the most progressive forward thinking urban planning people in the country. I mean Fernando Costa and that list. You have some very progressive stuff going on there. On the other hand this is the largest city in Texas that did not vote for Obama, every other large city in Texas. It didn't carry the state, but Fort Worth was the largest city to go for the other guys. You also get this thing where with the urban corridor, we are doing like a road diet and putting in bike lanes and things. So, you have this huge demand for that and we now have bike share stations. So, you get this progressive thing going on the one hand and then you get a neighborhood that they want to restripe Forest Park Boulevard. It is not going to force any cars into this particular neighborhood, but it is going to make their drive to downtown three minutes longer. So you get this uproar. There is this dichotomy between future Fort Worth and old Fort Worth is how I would put it. So when you talk about political will you have some very progressive stuff going on and a desire for that and on the other hand this is a very politically red place.

Rob Gaudin: I am getting the notion that we have a plan of action laid out. It takes a longer period of time and the likelihood of obtaining those goals is significantly increased.

Comment 83: I would think so and more effective than flying on the seat of our pants. If a developer comes up with an idea or a location that it is ok and do it there with seeing if it fits into our overall plan. So yes, having a long range plan type to follow, you may need to modify it along the way, but at least have a roadmap for us to follow.

Comment 84: What does the Comprehensive Plan say about any of this?

Comment 85: Probably the plan checks all of the boxes.

Comment 86: It is the basic.

Comment 87: It checks all of the boxes, but it doesn't do a real road map to provide affordable housing in effective locations.

Comment 88: The plan to me is you have to almost spell out the locations and you have to have criteria and standards for the developers. You have to have people that are going to stay with that facility. That is part of the problem with Woodhaven. They flipped those so many times that I don't know if anyone in Texas owns them. I always strongly say that this is going to work with Stonegate and everything because I knew that the Housing Authority was going to be the owner for the next 50 years. I knew it would work. We have to be careful that we do not have that kind of plan that any developer could develop. Especially if one is going to try to flip it and get their fees out of it and move on. There has to be some criteria along that line, I think.

Rob Gaudin: So there is like a certification process.

Comment 89: Something like that where. In tax credits they have to own them for ten years?

Comment 90: With tax credits the developer is coming in for the quick profit. They want to get the developer fee and the profit on the construction. That happens in the first three to four years and they are ready to flip the property. My experience would be 15 or 30 years extended. That developer will be gone in two to three years with a pocket full of money and they don't care about the property after that. So it is the tax credit lender and investor that are left holding the bag. The Housing Authority has had to step in with four or five properties like that to bail out the development and to bring in some stability to that development because the developer had skipped town with the money.

Comment 91: Just to clarify it has always been properties they have looked at that they thought would work.

Comment 92: The city has a big hand in whose gets those tax credits. You have to have public financing to score well and guess who they go to? They go to the city for financing with a public contribution. So the city and the neighborhood controls who gets the tax credits.

Rob Gaudin: But the state agency...

Comment 93: The state agency administrators it.

(Presentation)

Comment 94: I think the exact location needs to be looked at very carefully. It is not necessarily the area. For instance a private developer who gets a tax credit is going to look for the cheapest land that is going to increase profit. He is not going to look at the residential amenities that I believe are important to support a good project like public transportation, employment opportunities, and retail. All of those amenities are important. The developer is going to be looking at where am I going to make the most money and where is the cheapest land.

Rob Gaudin: Wouldn't that be in the Qualified Allocation Plan that the state has?

Comment 95: There are very very few points awarded to those categories.

Rob Gaudin: Add points for being in a low-income area?

Comment 96: Well in the new QAP you have to be a high opportunity area with good schools, hiring, and all that. The other amenities are very minor unfortunately. Your neighborhood carries a big stick that is 24 points out of 200. The cities participation is another 18. That is 42 points right there out of 200. That seals the deal, but I am just concerned that I have seen several of those tax credit development put in poor locations. The developer is not interested in the long run; the neighborhood amenities are not there that are key to making it a success; and they have poor management. They come in and they want to meet the lease up demand so they will run anyone in there. They do not want to evict anyone and so pretty soon in there or four years you are going to have a rundown property with lots of problems. They are looking to keep their occupancy up and keep a profit.

Rob Gaudin: Those would be tentatively located in what particular area?

Comment 97: You would find them pretty much everywhere where the land is cheap.

Comment 98: Are there examples of those site controls that we are alluding to in other cities that we may use in the plan?

Comment 99: I am not familiar.

Comment 100: We are saying that we need to do this and we need to do that, but what are other cities doing that we can use as a guide to help. No wonder neighborhoods are opposed to this. The developers are coming in and putting up these projects and running away three years later and the multifamily is degrading. So, what can we do to ensure and to show the neighborhoods this is what we are building and it is a good product and this is why you should support it.

Comment 101: Again, I think that is why you should look at what are the problems that some of these projects have incurred. At Colonial Park, which we took over last year, it was seven years old, it was gang infested, and the occupancy was 75 percent. When we took over that project we took it down to 50 percent because we took out all the undesirables, we did a facelift, and put tight management in there. Management is a key part of it. I don't think we need to go to any city to find out how they do it because we have smart enough people in Fort Worth to figure out.

Comment 102: We are just trying to figure out what is working and it is not working here.

Comment 103: Again, I think a focus group like this with the right people we could figure out what is working and what is not working.

Comment 104: Then maybe state law. Some additional criteria...

Comment 105: Absolutely right now the state is having public hearing on the QAP for next year. Is the city involved and do they have an input into the QAP?

Comment 106: I do not know.

Comment 107: I am just saying, because every year and every round they develop a new QAP, the rules and regulations. They have public hearings and everyone has an input. Two years ago we were very effective in changing the QAP because prior to that they were requiring, I believe 15 percent three bedrooms in every tax credit development. Well that doesn't make sense to have three bedrooms downtown. So we worked with downtown Fort Worth, we got the five largest cities to support an amendment to eliminate the requirement from downtown development. That is the type of proactive action that is needed to impact the state into what will work and what will not work.

Comment 108: The problem is making sure that they stay in compliance though.

Comment 109: You can put everything in the world in writing, but if you don't have someone staying on top of that. Ensuring compliance five years, ten years down the road, it doesn't matter.

Comment 110: The word out on the street in Fort Worth is you are not going to get support from a neighborhood for tax credit development unless it is for elderly. There will not be a support for family developments in most neighborhoods.

Comment 111: Maybe the compliance is can be achieved with the state working closely with the municipalities. The state doesn't have resources to enforce or inspect. We are in closer partnership with the city and the city may have those resources and the cities are closer to the projects.

Comment 112: I understand your concern with the examples I gave. I don't want a rundown multifamily next to my neighborhood. There is some education to be done. I think it goes back to the plans and say this is our standards, this is what was expected, and this is what we are going to get. When I started working with the Housing Authority years ago, council members were telling guys that we are not so sure that we want the Housing Authority coming in our neighborhood. Now we have council members calling us saying that there is a problem in an area with this development, can you take it over and turn this around? So it is a matter of credibility and education.

Comment 113: That was when I first got into the Housing Authority, we started to develop these plans that we were going to own market rate apartments. We had a staff that all their careers were in HUD. I knew they were brainwashed a little bit and I said that we have to buy one just to see if we could run it before we develop this. We bought on at Woodhaven and we got through the neighborhood association and they were just mad. We were going to be the best neighbor you ever had. We will show you the books. How many landlords have offered that? They wouldn't even return our call. I said that we are going to get this. We bought it. We watched it. We were learning, because no one had ever run a market-rate apartment complex. Back I forget how long it was, it was 60 percent occupancy was the average in Woodhaven with those 4,500 units. Sixty percent. Ours was 97 percent and it is because of the management team and the people we had running it. How they operated. We had the strictest application guidelines and one strike and you are out. We follow that. We are strict as Hecht about any property we own. We decided to sell that because when we bought that we put in no Section 8 or no public housing and that is not our mission. So we needed to sell it, use the money, and go buy somewhere where we could utilize our mission. They were madder then when we were selling, the neighborhood association was. They were saying don't do it. You are the best landlords. That is based on 12 or 14 years of doing what we said we were going to do. I think that is what you have to your point that it takes time to build that trust. Initially no one is going to trust you, but somehow you are going to have to force it with a plan to identify pockets where maybe you weigh then differently to give those people that are building in those pockets an advantage. If the city can do something like that and before you come up with a standard if you let the neighborhoods know that you are going to build multifamily here, because this is what we deem necessary for the future of Fort Worth, but we will limit the total number to this. Then there is the criteria of the developers that we will look at that they have to own it for Blah, blah, blah, but people like an individual says that they know who can come up with that criteria and then you take that vote out of the hands of the elected officials. You take that pressure out and how do I say it without sounding un-American, but you don't allow that

neighborhood to influence those pockets. I would suggest that you do one in every city council district. Say that these are our priorities. We are going to do this many so no one can say, everybody is in the same boat.

Rob Gaudin: This is all springing from your experience from having good samples to show the neighborhood and that is underscoring education and outreach. One of the things that we are doing with this Fair Housing Survey this is some preliminary results.

(Presentation)

Comment 114: The city with respect to land use polices has identified mixed use, so that is really along the city within the loop. I think we are cover there, but land use is not zoning. Therefore it doesn't have any authority. It is just a designation. The zoning has the authority. Maybe here in Texas and I am not up to speed with inclusionary zoning, so if you know the current status. Some years ago I heard inclusionary zoning here in Texas was something that was not in place at the state level. That means you would have zoning that would require an affordable housing component. We don't have that in Texas. We talked about TOD locations. We do have as he said; we are putting in place and some places already have the mixed use zoning, but that only gets you so far with the public.

Rob Gaudin: So Fort Worth doesn't have a mechanism to use inclusionary zoning?

Comment 115: I think it may be Texas.

Comment 116: It is limited by state law. Someone floated that idea around 10 or 15 years ago and I think it didn't go anywhere. You have to get permission on the state level. Each city is a subsidiary of the state.

Rob Gaudin: The example would be if you had 100 residential units and your inclusionary policy was 10 percent, then 10 would be developed as affordable. You can do it in a variety of ways depending on how zoning went. You could do it as size lot size or housing unit and stuff like that. There are also practices that encourage voluntary, which is an option. It is not used as often, but people do use voluntary inclusionary policies. You can give a developer in volunteering, to take on that and there would be rewards.

Comment 117: Something like that as a citizen I would be in favor. Typically I don't think that most developers, you have to put a carrot on the end of a stick.

Comment 118: Most developers, I don't have a lot of nice to say about most developers, to tell you the truth. I don't think they and it was like you were saying, is they come in the front and get the money as fast as they can.

Comment 119: The city council did adopt the Strategic Action Plan for downtown Fort Worth that did include a goal of 10 percent residential units at 60 percent or below AMI. That was progressive. It is just a plan. It is just a goal. It is not required. Again, downtown Fort Worth is embracing that we need affordable housing downtown. In tax abatement policy and any tax abatement that the city gives for residential development, you have to have at least 10 percent affordable at 80 percent of AMI for the period of the tax abatement. I think though looking at the policies that there is nothing there that the city has adopted and follows that is discriminatory or keeps us from doing the things that need to be done. I think it comes down to the political will. An example of a development that the Housing Authority wanted to do in this District was a nearly abandoned complex. I believe it was 15 percent occupied and nearly run down. We had all the money lined up to step in and knock it down and rebuild it as supportive housing and the night of the vote the council member would not support it and he

wouldn't now. The zoning was in place, the financing was in place, and it was just the political will not to do it.

Rob Gaudin: How do you overcome that?

Comment 120: You haven't because the councilman is still there. He is a good guy and he is a friend of mine, but on that case he just backed down. It was because of the calls that he got from his constituents was the reason. If you are an elected official and your desire to return back the next turn you are going to listen to your constituents.

Rob Gaudin: Usually politicians do.

Comment 121: Usually they do, but there are some few. I do not know of a policy or ordinance that I would point to and say that is discriminatory. We are beyond that.

Comment 122: Is a barrier to build the property.

Comment 123: Everything is in place.

Comment 124: It's just the resistance.

Comment 125: Don't you agree that everything is in place?

Comment 126: I think there are a lot of incentive programs, but I think there are some historical issues. You are right. I was at a lot of those meetings for the plan, the mayors Commission Plan and you have a limited staff and limited funds and it is very difficult to follow through.

Comment 127: Complaints will be a big issue with any plan because of staffing issues. Who are you going to get to go out and inspect these buildings? You have limited inspection, limited compliance. Who are going to be the people to oversee this program? So there are a lot of obstacles, but I think that there is potential in the proposed plan. I think it would be a good idea to have who is going to oversee it and watch over it so these people who are supposed to be taking care of it do not just cut and run. It is going to have to be a whole other branch.

Comment 128: I think that the city should not and cannot go at it alone. I think it has to be a consortium of other entities, the County, the Housing Authority, the city, and other nonprofits that would step up and private sector that would step up to the plate. Let's do it together. Let us jointly be responsible for the development and the implementation of this plan. You can bring the league of neighborhoods in and let them be at the table and you move forward with it. If the city doesn't, the private sector will say bureaucracy at work. How are we going to get around it? Bureaucracy is putting more cost on us and giving us things that we do not want, but if it is a collaborative effort then everyone has a part of it.

Comment 129: I know that it is hard with neighborhoods that oppose thing, but I know that something that we are going towards is empowering the neighborhoods that we are in that they police themselves. That they know they have a voice that goes on in their community and they police themselves in a good way and make sure that when a co-compliance office is not able to step in or when there is a disruption they know who to call and when to call and they will get a response. It is empowering the citizens.

Comment 130: Part of the success in the near Southside, it is at a huge, the success of that area phenomenal from what it was 15 or 20 years ago to what it is now. It occurred from what you are pointing to. There was a preexisting neighborhood association that already had a good strong foothold and that was the Fairmount District. There is an historic component to this neighborhood. They were already there and the other thing that the city did was they

established an organization near Fort Worth South. It is like a neighborhood association on steroids. The stakeholders in that were the hospitals, employees, and what have you. The city set that up and it is really like a neighborhood association on steroids. Membership dues are what keeps it going and they are not tremendously expensive for individual citizens and businesses. They administer a TIF so that is how the staff is paid, but we are always on top of our area. It is almost like a mini council district in a sense. It is a portion of District 9 that is focused on its area. It is larger than just a single neighborhood. It is probably like five or six neighborhoods and it has been extremely effective in terms of what you are both saying.

Comment 131: It was about 20 year's creation?

Comment 132: Yes, 20 years.

Comment 133: Very successful.

Comment 134: Hugely successful. When we first started the medical district, we don't call it the medical district anymore. That was one of the things that Fort Worth South did was we rebranded the area and the perspective of Fort Worth was that you didn't go there. You didn't go there after 5 o'clock at night and if you were there after 5 o'clock at night you made damn sure that your car doors were locked and you were leaving. Now it is rivaling downtown in terms of job growth, restaurants, housing development.

Comment 135: Parking problem.

Comment 136: It is true. There is a huge parking problem.

Comment 137: That is the best problem to have.

Comment 138: It is a way to self-regulate, to have the neighborhood or have an area be its own watch dog.

Rob Gaudin: Earlier you had talked about that that. You talked about that there was very little knowledge of a fair housing plan. That is one of the questions on our survey too. Most people do not know that it exists. What comes out of this AI is what steps need to be taken. So how should that be stated to the public? How do we wish to use this to educate the public?

Comment 139: I am not clear on what your question is.

Rob Gaudin: Since very few and even the stakeholders that were surveyed understand that there is actually a fair housing plan. It is not well known.

Comment 140: Fort Worth has one.

Comment 141: Are you talking about the prior AI?

Rob Gaudin: Yes.

Comment 142: We have an AI that has extremely outdated data, so you are right we do not publicize it.

Comment 143: Were any of those impediments addressed that they now are no longer impediments?

Comment 144: The primary area of impediments that were identified in the prior ones had to do with mortgage lending and those were address. There was a big settlement between some local banks and this was like 10 or 15 years ago and that both of the AI's, we had really emphasized that. They didn't go into some of the multifamily issues that clearly have been more recent and the affordability issues. The prior impediment analysis focused on the issues

that came up with the mortgage lender that came up in the late 90's. There was a lot of publicity at the time. Also, quite frankly speaking as a planner, their survey had 30 people. We hired a different consultant and we had a very small. Frankly I don't publicize it.

Comment 145: Could this group have a copy?

Comment 146: Sure I could provide one.

Comment 147: You wouldn't consider it a fair housing plan?

Comment 148: No, it was not a plan per se.

Comment 149: So, we do not have a fair housing plan?

Comment 150: No, we have a Consolidated Plan for use of Federal funds and we have the plan that the mayor's Commission on Assessable Housing plan created. It was not fully a document. It was a PowerPoint presentation that went to the city council and said that these are the key goals that we want to work towards and there is that AI. It is about four years old now and again the concern is that the information was quite outdated.

Rob Gaudin: What come out of this work and my obligation to the city is to identify the impediments, suggest actions to mitigate, and overcome the impediments as well as some better criteria. So that in and of itself lays out a plan. So the city needs to select something to put in its niche of Annual Action Plan. Something it can do and send the document to HUD. We have identified these impediments and these are the actions we are going to take. Then you report back these are the results of your action.

Comment 151: That is the only thing that gives it credibility. With the Housing Trust Fund and all the frustrations was that it never went to the next step and so none of us, we all have busy worlds and to sit on a task force and not have your suggestions mean or be acted upon.

Comment 152: I sat at those meetings and I understand. All I can say is if HUD is telling you that we will take away all of your money if you do not fix this and you have five years to fix it.

Comment 153: I am not throwing anybody under the bus as far as that goes. What I am saying is moving forward now. I don't know what happens next with this group or with what we say here and you recorded it and you are in big trouble.

(Laughter)

Comment 154: Let me clarify what the next steps are. The purpose of having three groups and we have had a homebuyer/homeowner group; we have had a renter issues group; and we have had this group there are to generate ideas and key issues. Mr. Gaudin will go back and consolidate the information and transcribe it as he says. We will be having a debriefing phone conference about it and he will probably be doing more research and analysis about it and some of the key things that have come up. We will be providing him with more information. There will be forums and there will be at least two where there will be a presentation made of a draft plan, a draft AI which will go through the data and the ideas that have come out, the findings of the survey, discussion of all of that. There will be opportunity and it will be out on the website because, this again we are following the citizens participation process so the whole plan will be on the cities website for anyone to comment and we will be sending out mass invitations to these forums. Then we will finalize the report, consolidate it, and try to come up with specific actionable steps that are part of the AI and put the final document out for public comment. So our goal is to get that done by the end of December. I am not sure if we see this as the same as an Affordable Housing Plan it is a little different than the narrow of focus.

Comment 155: I think you have to check the box for HUD to get your money and then by all means do that. You have to keep the money flowing so check the box. Aside from that I think the city should seriously consider developing a plan that can be implemented to address these issues that we have discussed. City wide. By all means check that box first.

Comment 156: Of this 314 is that all that is going to get the survey? Is that done?

Comment 157: No, it is not done.

Rob Gaudin: Actually as of last week before this presentation, that is how many that had applied by then. Now I think it is at around 350. I think we will probably keep that open until the close of October.

Comment 158: Has it been sent to folks on neighborhood associations that have rejected some housing developments?

Comment 159: The first list included a lot of neighborhood representatives. I am going back to find out, because I came into this a little, the process had been implemented and I came into it six weeks after it had been initiated. So I am verifying who that original list was. I was told it was a lot of neighborhood association representatives. It may not have been the presidents of each neighborhood association per se. That is where I need to get some clarification.

Comment 160: I would recommend that you try to identify some of the most vocal critic for multi-family, for fair housing, for affordable housing from these neighborhoods. The Samaritan House wanted to do a building on Beach and an individual and that group objected to that.

Comment 161: The more recent one in Meadowbrook?

Comment 162: On Beach just south of 30. It was somewhere along there, but I remember that is who killed it. That group and anybody in the recent past and the group that he talks about and that is in the last two to three years where they have come out against that property that they were going to rehab. I would send it to several of those folks. I would like to hear from the people from the critics. That is the most critical. I was raising money for the hospital one time and they all kept telling me that the doctors were the worst at giving to the foundation because they were always cracking about it. I said that I wanted to meet with them and they said you don't want to meet with them. They are outspoken and they are mad. I said that I do want to meet with them because you guys are happy and you all give money and I wanted to find out why they were mad. You know what it turns out to be mostly? Well, my wife wasn't invited to this party.

Rob Gaudin: It was all personal.

Comment 163: I said well why don't we have a party and we will invite her. Let's fix that real quick and I need some money. Well 100 percent of the doctors gave to that fund drive. I had to get up to the ER at four in the morning, but we need to hear and I hate to use an individual's name out loud, but that group is adamant against multifamily. They just hate it. We need to hear from them. Anybody who is against it, we need to hear from them. If there could be a little research done.

Rob Gaudin: Your point is really a great one.

Comment 164: Thank you. Let's find out. The other thing I think is lack of education on their part. They see. They have misconceptions. The problem was people would say Section 8. Only 7 percent of them were section 8. If I go now and she were to speak one day hosting at leadership Fort Worth and I was around a group and one of them was an attorney. He starts

talking about the negative stuff about public housing and the Housing Authority. I don't like deadbeats and I don't like that. It keeps people out of work. So I let him talk. When he finished I said well what would you say if you know that 80 percent of the folks that live in public housing or housing choice vouchers are female. Mostly single parents and what would you say if I told you that almost 50 percent of them are senior citizens and they did work, but they worked at mowing yards, maids, things that they are not going to get a retirement like I am going to or that you are probably going to get from your law firm. He said well I did not know that. Then what would you say now. I guess we do need some public housing and we do need affordable housing. To me the people that are so angry at Stonegate didn't really know the facts and it was a hard time to try to talk to them.

Rob Gaudin: Your point is absolutely right. Figuring out a way to try to use the end product that we produce here as an educational tool. That is part of what I am asking. How do we get the word out? How do we get the tool review? There is a public involvement process and I am hoping that all of you know community members and people who may sit on the other side of the table and you may be able to inform them of what is coming. You are absolutely right. If you are not going to listen that is one thing. If you are only going to talk and not hear is another thing. If we can at least get everyone around a table ten at least they can talk and listen.

Comment 165: Maybe have some data points that are true to affordable fair housing. This is the facts and I know a lot on the eastside. I live on the eastside and a lot of those folks always talk about how low the crime rate is. The numbers and I haven't look at them so I am assuming they are correct. If you should talk to anybody that doesn't live on the eastside, then that is the most dangerous place to go. So somewhere the truth lies, right. I do not know how you guys, but you have to bring the ones that are the most welcome critics. They are the ones to your point, the council person who backed off that rehab. I bet he only heard from 10 or 12 people and that was enough to sway him, so if he doesn't hear form those ten people then maybe he will grow a political will.

Comment 166: We are pretty fortunate in the city to have a strong neighborhood cohesive group of neighborhoods. I think that the neighborhood concerns are valid in some respects. Where just had a zoning case a couple of months ago where they do not want any more multifamily to be rezoned in that area because of the negative players and the negative aspects that have happened because of the multi-family. We are fortunate as a city, to have a cohesive group of neighborhoods that can come together and speak their mind. I think some of the low hanging fruit that we could take care of now is maybe an ordinance or something within the zoning ordinance that could give the carrots to the developers for having 10 percent affordable housing. There are other sites that allow additional density or other perks for the developers that by choice allow or provide affordable housing. So, there is some low hanging fruit that we can do in the next two or three years to address fair housing as far as affordable housing within the development community be offering them additional type development things i.e. additional density, parking, or something of that nature that will entice them to want to do a little bit more affordable housing. Then you get back to the economic aspects of it. So, maybe start with the ordinance aspect as far as the development of affordable housing. Education, I agree is huge. Now when people see fair housing blocks go up. We need to define it and educate our citizenry about what that means. I think that is really important.

Comment 167: I think my group would follow the incentive side of it. We are a for-profit builder and I know for us with the NEZ program and I work with an individual for that and setting that up. I had no experience with any of that type of program at all in homebuilding and just trying to learn everything we had to do to file and be a part of that program. Then trying to

go through all of our steps to get our plans approved and turn all of the paper work into the city and have all of that approved then to get through that. It was a huge incentive for us that to start a house in that neighborhood was going to cost us \$75 verses when I started a house a block down the road it cost me \$6,000. That is huge for a builder especially when you are trying to build affordable housing, because who does that expense get passed onto. If it cost me \$6,000 just to get a permit to build a house before any of my expense. My expense is \$90 to \$120 on a house depending on the square footage of it. That is huge and that is a huge savings for that buyer. Then you get into that community and you try to explain that to the buyers that have the tax abatement on that side of it too. There are still challenges once you get in there. The first four or five houses we built everything was stolen out of them. We were good to close and we were a week before closing and we are trying to get our final FHA inspection done, all the appliances were stolen. That for us is two more weeks we have to wait to get that all fixed and fix the repairs and rewire a house which costs us even more. We can't raise the price of the house now. We have already marketed that house. So there are a lot of challenges for a for-profit builder that wants to come into neighborhoods that does have affordable housing. We have houses that we can build for \$80,000 that we have sold to a lot of empty nesters, senior citizens that are people looking for that product. It is a great product. It is energy efficient and has everything that you would want in a house. It is just as good as a \$300,000 house, but for us to build in those areas and do that inevitably we have that issue where within being in that particular community for three months we had to go back to the developer. In that particular community we didn't develop the lots we combined with a builder. We have a shared responsibility here. We are going to have to put in a gated access because we can't keep every house we build. We can't keep having the house destroyed a week before close. That sets us back another month. Just like you were talking about with lenders, we have obligations to the bank. Each house is on a loan that we have to pay interest on and there starts to become no incentive for us to be in that because of that. Since we have done that and put the gate in and had to repair it four times, because people have run trucks through there to get into the neighborhood to do things. It has significantly decreased what we were seeing in there. It's by Arlington, it is water front. The price point around there is \$140,000 and up, but it is in an area in there where there is either million dollar houses on the one side and less desirable area on the other. We were having so many issues and it is a huge challenge when you are only building 60. We started in the market in 2009 and out first year we only built three houses. We are up to about last year doing 70 houses. When you are trying to get going and you only have so many funds for certain areas even when you have the product and you have the will it is difficult to do that.

Comment 168: And when you are the first person in you have crappy appraisals on top of that.

Comment 169: Exactly. So you can't get value and you have to decrease the prices of the house before you sell them. Again, we already have our cost in it. We are done. We are already out there. We are already exposed. We can't get there. I always express frustrations and there is on the permitting side of the city, not on the NEZ program, but then you wait for six to eight weeks to get a permit to build a house. Then you have turned in a ridiculous amount of paper work and have done all you are supposed to do and you are told that your permit is sitting on hold because we do not have this on an approved list or it is not master planned. You can't get anywhere. Anything and as for-profit builder in the city of Fort Worth you wait a lot of time and you have buyers walk away because they can't wait for the permits. They get frustrated and they don't see movement. It is hard enough for them to get a loan. Loans are still a huge challenge. They jumped through a million hoops to afford that house. We are in it for-

profit, but there is nothing more satisfying than it is for a single family mom and you are building them the house that they are going to live in. That is not a car. They are not going to drive it for a little while. It is a house that they are going to live in their everyday life. It gets discouraging when you hit so many road blocks with what you are trying to do. It is not just that it is EPA sides and everything you have to do to be a builder.

Comment 170: Even if there is a fast tract permitting process for those who do 10 percent or 5 percent affordable housing. That is an incentive that will lead people to want to provide affordable housing without telling them 10 percent they have to provide it.

Comment 171: Even our stuff that is in the NEZ and even though we have master planned all of the plans and it cost a lot of money for a builder to go out and get the plans mastered. We have to get all of the wind bracing done on it and are not 100 percent sure why we are doing wind bracing stuff in the city of Fort Worth, but we have that extra expense. Then we go through all of these steps to get it master planned because we think that that is going to fast track the permit when it goes in. Our NEZ permits are taking longer for us to get back than a regular permit that we have filed. So it is like why did we spend all of that extra money and all of that extra time up front time of every plan that we are going to build to get it mastered, because we thought that this was going to expedite the process to get our houses on the ground faster and it has done nothing. It hasn't helped me at all.

Comment 172: Who is your primary contact for development?

Comment 173: Not for the developments. We work with the NEZ with an individual who is amazing because even the last three permits we did the plans were mastered planned and they said that we do not even have a record that you have even done this. We have built that plan three times already. It is the model that we have. How can you not approve it? If we did not have her over there to help us, we would probable still be sitting here and not have a permit for it. That kind of thing happens on a regular basis. Really most for-profit builders use a third party.

Comment 174: What I do is for-profit, but I do not have to generate the same kind of margins that you do. It is for-profit. I have a mortgage. I understand there are issues. You have that kind of issue. I think the City of Fort Worth staff is great. You have to spend a little bit of time knowing who to call and making the calls. Half the times I end up with is projects that they look at and go yet again you are doing something that we have never had to permit before. I am doing urban renewal, old lots. The one I have in there right now. I just set up meetings with all of the development people and they said that you are right. We are not sure exactly. I think that the city is pretty good. You just have to know who to call and be willing to be patient on that.

HOMEOWNERSHIP FOCUS GROUP

(Introductions)

(Presentations)

Comment 1: So what I am trying to gather my thoughts on is from 2000 to 2011 was there much change or was it pretty much the same?

Rob Gaudin: There was some increasing level, like this jurisdiction average was 15.9 percent, so over the entire city had a higher poverty rate at 18 percent.

Comment 2: So it was worse in 2011 than it was in 2000. That is what I am trying to get to.

Rob Gaudin: And we see that there are more areas where there is more poverty.

Comment 3: What are some of the indicators that lead us to that determination? How did we arrive there?

Rob Gaudin: That is what we are here to talk about. Part of what this is is to review those that are in protected classes and how do they face their housing choice.

(Presentation)

Comment 4: I am looking at and that is an interesting statics on the Asian persons and certainly now I think it is more culturally impacted than anything else. From my experience the Asian persons seem to do more to get together as a community and they help each other more to achieve whatever it is and to get over whatever obstacle there may be. They also have a small percentage of population and they tend to migrate together. Now as far as the African Americans are concerned here when we look at this, I am also going back maybe more than most people in the room can go back. I think jobs, where jobs are has a lot to do with where black persons seem to migrate and move. I think that is the way it has always been. Where jobs are and really a lot of the blue collar and now some of the white collar jobs, you will find a large percentage of African Americans. Where there is transportation. When I look at the map and it looks like over here in this pocket, it is the southeastern sector. It looks like it improved from 2000 to 2010, but then it looks like and in my mind I am thinking what jobs in particular may have caused the migration of that population and therefore it may have also caused an impact. We have all experienced this situation with unemployment being as high as it is in the last few years. So, people may have moved with the job and as some life change occurred when they moved to those locations, jobs may have had something to do with it.

Comment 5: This is the poverty indicator, right?

Rob Gaudin: This particular thing, this scale is the concentration of the black persons. This is the Census Bureau terminology. It is just a concentration by census tract. We do see the population extending out to the east here and having over concentrations in this particular area.

Comment 6: This is just as far as ethnicity, but not poverty?

Rob Gaudin: Poverty, this is the same thing the concentration of the people. This is poverty. We don't see necessarily the poverty out here, but we do see concentrated correlating with where the black persons are residing. So the question is why is that?

Comment 7: I think one of the reasons that it has spread since 2000, the lines have spread out because the overall population has increased in Fort Worth and the County by probably like

200,000 to 300,000 people. That is probably why the lines have spread more from the concentrated area out to other areas.

Rob Gaudin: The black persons have increased 18.9 percent.

Comment 8: The Asian persons, I saw a study probably four months ago that talks about the Asian populations. Although it is small it is more professional and educated group with a much higher income than all the other ethnic groups, because...

Rob Gaudin: I want to make sure that we understand this distinction correctly. Asian is a race just like black and white, Hawaiian. Ethnic is Hispanic and you can be Hispanic or Non-Hispanic. You can be Hispanic of any race or not Hispanic of any race. So, they are two separate categories.

(Presentation)

Comment 9: It is cultural.

Comment 10: I mean that is not the, but it is a big part of it. I grew up in the Northside of Fort Worth and to this day if you go to buy a house over there they are hard to find. They want to live there. It is a lifestyle. It is like a small city within a city. You can live there and get by there and not know a word of English from buying groceries to buying a car to whatever you need. It is all right there. So they are higher cashed based society. So I would imagine that the numbers you get on the census. I do not know how accurate they are and I am sure there is a lot of poverty, but they deal with a lot in cash. We run into this, I am sure that you have seen this as lenders with verifying income. It is just a whole different lifestyle and they just like living there.

Comment 11: I would like to add that what we see is not just with families that we have been approved, but families that are interested in our program. If they have family members in a certain area of town, they very much want to be as close to them as possible. Especially families with children so that a younger family can have the grandparents help with babysitting. These families really rely on each other for assistance in child rearing. It is also not unusual to see a young family with maybe an uncle or an aunt to maybe a grandparent, where you see these generations in the same household. It is the idea that the family stays together and if they do end up moving, they try not to move too far apart from each other. That is what we have seen.

Comment 12: I think that is very similar to what the black community was experiencing 50 some odd years ago. We were trying to do that very same thing. I think as a result of Civil Rights legislation and that whole era, a lot of that changed and we were able to start integrating neighborhoods. So we were in essence moving toward employment. We were given opportunities for better jobs and so we were moving where the jobs were moving and we were able to integrate into the communities. So, we were moving away. Just the opposite of where you are today with what you are saying. You have groups not that are now coming around that cycle is coming back around again. So when you look at some of the communities, where in the 50's and this area here in the City of Fort Worth in the late 50's is when we really started integrating our communities and a lot of white persons were moving out and black persons were moving in until maybe another 30 years when other groups starting moving in after the African Americans. So, now what you have in a lot of these old communities, like Southside and on the Northside as an example, you have a lot of your older African Americans and your older Hispanics that may live in a community and they are there and their income hasn't increased. Then you have their children and grandchildren and so forth that come and visit them and who may be able to leave their children there for day care, but do not necessarily

live in those communities. Then when you find perhaps a young African American or a young Hispanic may be who is trying to move through the process and have a better way of life. The homes that are left because they have been neglected are not safe environment to move into. So they tend to move in other areas, but they have that relationship back to that old neighborhood, but they do not necessarily move mom and dad or grandpa out of there, because of some of the things that you mentioned. They are comfortable there. Their church is there. Their grocery store is there. Their friend is there that they have known for 40 or 50 years and they really don't want to move. Yes, they may really be living in poverty, but I also think to your point with the Hispanics. I know that it is a large cash society, but over the last 15 years or so we have seen more and more of them engaging into banking and mainstream types of things. I think it also may be a cultural issue as we pointed out generations of people living in the same house. Just how factual is the information? When back in the 50's as African Americas, we were uncomfortable when the census takers came to give them what they asked for. We are still uncomfortable. We have gotten better where we will be more honest, but we were really not honest with how many people lived in the house and how much money really came into the house and that type of thing. I think that even though the data is probably very valid. I think that some of it is skewed which you have no control over how population is given to begin with. I am not going to tell you that I live with my mother and I work at a major corporation making \$100,000 a year and maybe I live on the Southside and I am giving my mother money and have paid for remodeling of the house and whatever. I am not going to tell you that. It is just not going to come out.

Rob Gaudin: When I see this where the concentrations are. It kind of looks a little bit segregated to me. Could you explain that?

Comment 13: Are those also poverty level areas?

Comment 14: That is just communities.

Rob Gaudin: None of these. It is just the concentration of race or ethnicity.

Comment 15: I think some of it has to do with school systems. If you look at the west you are talking about people that could be in the Aledo School System. Down south there is Crowley, you have Eagle Mountain-Saginaw, and Northwest. Those are the desirable schools.

Comment 16: I think that you hit it on the school thing. The number one request I hear as a real estate broker is schools. The comment that I hear most often and Fort Worth ISD should listen is anywhere but Fort Worth ISD.

Comment 17: That is true.

Comment 18: It is sad to say, but that's Crowley. I sell a lot of homes out here in 76123, 133 areas. Crowley great, but Fort Worth ISD I am sorry. That is definitely the number one thing. The other is just simply a fact that no matter how much you promote equality and what not, people still prefer to live in a similar cultural environment and there is no getting around that.

Rob Gaudin: So does that trump schools.

Comment 19: No.

Comment 20: Look at you maps, it is a clear indication of white flight. As you see it starts off closer to the middle and as you see as more of the other groups move in, they move further and further out as the other groups move in. That is just the way that it has happened. It is a clear indication to me that where ever the protected groups go they want to go further away and that is what the maps look like to me. They want to move further out into the suburbs and

further out into, as we move into the inner city and be close to the city. That is what the maps look like to me.

Rob Gaudin: What do you experience in the real estate industry?

Comment 21: Well, to his point just based on how the city and the building is going, you have the school districts has a factor, but for somebody at my age who may still want to buy a house and school district is not a factor there are other cultural norms that come in and are an issue. So what I see happening is a lot of white persons coming back into the inner city community and reclaiming neighborhoods. That is what I see.

(Agreement from other group members)

Comment 22: That is the cycle for regentrification that is taking place all over America, because the cycle is closing. They are tired of the suburban commute and coming back into town to do everything. So now you look at your amenities. Where you have mixed use communities; where you have the store; the retail; the lofts and the nice restaurants. So people are coming back into the communities and they are reclaiming. I think that is driving the city to take some action on some things like zoning issues and code enforcement issues and so forth and tax issues where people have been delinquent on their taxes. A lot of the young white persons are moving back into those old communities that maybe were three generations before them where their great great grandparents live. They are moving back and it is just like it was before when it was applied to your point. When I was a youngster we were moving out to the jobs and following where the jobs were. Now everything is coming back in.

Comment 23: You have the next generation coming back. There is mixing and the crossover.

Comment 24: They are more tolerant.

Comment 25: They are coming back into the community where the older went out as far as they could get out. As the other ones get better educated, they are getting more comfortable with the mixing with other groups. They are coming back in and mixing with the group.

Comment 26: Some of it is integrated and some of it isn't. I think of the Mistletoe Heights area and over off of Magnolia that is still to some degree a Hispanic population. A very small poor black population over there and what I call the young and up and coming white persons that are professionals, doctors, and lawyers and so forth that are moving back over. It is not your average Joe that is moving back into your communities, but it is happening. So from a standpoint of how it is happening, I think employment and money and we know that money rules America. It has a lot to do with it and also just our normal cycle. I mean 40 years ago there were very few white persons along the Northside, but you look now and you see them moving back. They may not be a resident yet, but they are buying property because they are preparing. Then now what you see is a large increase of Hispanics on the Southside. I am talking about the Southside, not Southeast where Poly is right there off of that 35 Rosedale Quarter. A lot of that has to do with what the Consolidated and Master Plans says about here things are going and that is where some people can afford and are preparing 10 years from now, 20 years from now to be.

Comment 27: What you are saying is happening when they are moving back in is that those property values are going back up as opposed to as when the other groups where there. Now they are renovating and increasing the property values. Eventually they will regain the inner cities because of the value.

Comment 28: I think another thing is you look at the increase in the population in Fort Worth and a lot of it has to do with the people that are moving in here. If somebody moves in from Chicago the neighborhoods they know may be Mistletoe Heights, Berkeley, TCU and that is what is appealing to them. Other people and I have clients who love West Fort Worth because it is wide open and they can build a new house. I will submit that a lot of that is new housing, 30 years old or less.

Rob Gaudin: This group is growing 42 percent.

Comment 29: Where there is land the builders have not stopped. Now where we are is if people want houses we do not have houses to sell them which is giving the builder more ammunition to keep building further and further out.

Comment 30: North like in the Alliance area.

Comment 31: With the exception of the Hospital District which is the largest concentration of low to moderate income employees in the city.

Comment 32: If you look at the housing around. The housing for now and that is my point of the gentrification of the neighborhoods coming back. You are right that is one of our major employers the Medical District. We know those people start out making little, but we know their growth potential is great. If you look at the housing, they have to select it from right there in the Medical District, Mistletoe and over in there. They can find a beautiful home, but if they come to the other side of 35.

Comment 33: That is exactly right.

Comment 34: If they come on the other side of 35, then what I am saying is happening is they know they can't buy that half a million dollar house off of 5th Avenue in Rosedale, but they can come and buy one of those. They buy a \$1,500 or \$1,000 lot and find them a builder to build a house for \$100,000 and in ten or 15 years the house is going to be worth half a million, because everybody else is going to start doing that too. The city has already laid the infrastructure and this is my opinion, where they are putting money into that other side of 35 all the way out to 820. So, you are going to have sidewalks, you are going to have walkable communities and they are foreclosing on properties for taxes and they are tearing down the rest of them so people will be able to come in. I serve as a Building Plan Commissioner so I am not being negative; I am just saying that this is really what happens. They give you so long and you have to pay those taxes. They are going to foreclose on that builders and the rest of them they are going to tear them down because the property heirs are not doing anything with it. That opens up opportunities for the people to move in from the Medical District and say that this is a 55/100 lot and I will buy two of them for \$2,000 and I will build a 7,000 square foot house and I will go down and petition the city and all of my neighbors and we will get a gate around it. That is just what we do.

Comment 35: Let me ask you this. Is the purpose of this focus group to get information and what will you do with this information? What are you looking to do?

Rob Gaudin: Well what I am hearing you say is a lot of cultural issues. I really am not hearing you say that there are financing problems.

(Presentation)

Comment 36: First of all with the Hispanics, you see that a lot of them get denied simply because of their cultural belief in their finances and the way that they do things and the guidelines do to exactly fit the Hispanic Culture and how they save money. A lot of them and

you can correct me if I am wrong are not real big into institutions. We run into that when you are lending and you have to prove and to source your income and source your assets and all of that is when we run into difficulties. A lot of them we run into, they do not have the necessary paper work needed to get the loan approved. Black persons on the other hand it is usually credit issues. There are a lot of credit issues. A lot of abuse of credit and that has been in the past. I am seeing a lot of better applicants now. I do not know how long ago that is. From 2004 to 2011, we are seeing a lot and now with the guidelines as strict as they are it is difficult.

Comment 37: One thing is education about credit is an issue.

Comment 38: That is what I was thinking. If there is something that you could do to pour more money into; literacy and organizations like Housing Partnership. That one class a month?

Comment 39: Two, but they fill up fast.

Comment 40: Credit is a big issue and the abuse of credit. A lot of the time in the black community you have family members that are letting other family members use their credit. That is where you get a lot of the abuse from. It is family and you are taught this is your family and you will let one use your credit and you suffer the consequences for it. Educate on credit. I think it should be taught in school. It should be taught in school, because when a child turns 18 they get a mailbox full of pre-approved credit card applications and all of that. Then they think that they have won the lottery, but no one ever taught them that they have to repay it. I think that credit should be taught in school your senior year or at least by your senior year. That is the issue you have in the black community and really any community. We see just as many non-Hispanic people and the group that you are speaking of come in and are not really sure of how this whole thing works. So when they come in and get citizenship they should be taught how this process works here in America and how credit impacts what they are going to be doing in the future. I think it is a huge class that needs to be taught to a lot of people.

Comment 41: I just want to add, I think with the education is very very true. I will talk to clients and they are thinking they pulled my credit two years ago and it was 500 and that sticks with them. We know that by working at it you can get it high in a few months. I think that education and understanding how the system works.

Comment 42: At back to buying a home, it could be that I had one thing that happened to me. So I am not going to try to buy and they do not realized that it can be fixed, but not knowing and not educated enough to know the process of how credit works. Then they are not even going to make that attempt.

Rob Gaudin: So it is the consumers fault?

Comment 43: The literacy is really important in the African American it goes deep, because when I was a little girl that is what your parent taught you was that your credit was your credit and your health and you didn't have anything left. Now, we didn't have any literacy classes and we were not going over to any of the counseling agencies and learning stuff. It was something that was taught to you in your family. It was a value that was taught in the family. So, whether it is in the family or some responsibility for the schools, I ultimately believe that the family needs to be responsible for a lot more than what we give ourselves responsibility for. We are turning our responsibilities for raising our children over to everybody except the family. We are letting everybody else teach our children. A lot of it has to do with other social factors too that come in and take advantage of poor neighborhoods. Several years ago we had the issue of the billboards and the alcohol.

Rob Gaudin: I think you are absolutely right. The reason I selected 2004 was because the recording system in the HDMA made some changes in recording the Hispanic and they called them race before that. They also began recording some outcomes of those loans that are originated.

(Presentation)

Comment 44: That sounds like predatory lending.

Rob Gaudin: That is exactly right. That is predatory lending.

Comment 45: Again, this goes back to me with education because the fact that you have predatory lending going there. That is just a way of life. How many of these title loans stores? They are at every corner of these communities. The interest rates that those people charge is criminal. You might as well go to the mob. I have known people who get those loans and you cannot get out of it. At 30 percent per month and that is the rate and it compounds.

Comment 46: When they attack the mortgage industry about it and everybody is foreclosing on their homes. Look at credit reports. Those payday loans are the biggest rip-offs.

Comment 47: They are criminal.

Comment 49: The choice of a 30 percent interest rate is ridiculous.

Rob Gaudin: What should the city do about that?

Comment 50: They need to have more control on the types of organizations and businesses that can move into the communities where there are poor people. I see it from both sides because there are still some issues with poor people and I do not care what color they are. If they are poor of any color and they can only live within a certain means, those are the ones that the tigers come out. So where those communities are and they know poor people live that is where they will put their company. If someone is going to give you \$500 and you are going to have to pay 30 percent interest on it and you are in an emergency situation, because you are already poor and your spouse just lost their job and you know you have to get some food for the children and it is not time for the food stamp card to come in. You have to make decisions and I am not saying that they are all bad.

Comment 51: They provide a service.

Comment 52: They provide a service and I would say that in a lot of those instances people realize the high risk, but they have to make a decision about their finances. I would dare say that some those people who get those payday loans and those title loans so that they can go out to the mall and have a good time. A lot of it is just to survive. They are going from one payday to the next and paying a portion to just eat, try to pay rent, try to buy clothes for the kid, try to buy medicine. It has become a way of life. Yes, it is a much needed service, but I think there needs to be some regulation.

Rob Gaudin: It is a matter of opinion if it is a much needed service. I do want to point out where denial rates are occurring and where the predatory-style loans occurred. You do not see it on the Westside. They are targeting particular areas. What can we do about it?

Comment 53: Regulate. Regulate and enforce.

Comment 54: Again, it is like when you focus on regulation. It is kind of like the drug war. I promise you 20 to 50 years from now we will still be talking about drug war. All you do is

enforce punishment. You have to get to the root of the problem instead of treating the symptom.

Comment 55: Big companies make too much money. If they would legalize marijuana, for goodness sake. I don't know why we are still having this argument.

Comment 56: I think that what everybody would agree on here would be education and catching the problem on the front end.

Comment 57: What about the parents and grandparents who are raising these young generations. How do you reach them? They are not going to sit up in any stupid training session to do credit.

Comment 58: Let's not call it stupid.

Comment 59: No, that is what they would say.

Comment 60: It's not like flipping on a switch and fixing it tomorrow. It is going to be a slow process and it may take generations, but if we do not start now we will not get the second and third generation and we will still be talking about the problem.

Rob Gaudin: What exactly?

Comment 61: Education, more and more money into education. Pour more money into education. They need to start with the high schools.

Comment 62: I think they need to start with the grade schools.

Comment 63: A public awareness campaign. For me as a Realtor® the key issues that no one has really talked about is different ethnic groups not really wanting to live where other ethnic groups are. I hear repeatedly, well I saw a lot of this kind of people here and I would really rather be over there. It is different.

Comment 64: We continue to think that we have and that everything in America is OK.

Comment 65: So, there is still that and the awareness to me and it really needs to be exposed. To have these kinds of numbers out there and that the information or the feedback that I get from clients that talk that way is that they equate living with certain ethnicity groups as two things: safety: the equate some ethnic groups with crime and low property values. Therefore they want to be in different areas.

Comment 66: That has been historically what has happened with some groups. We have had lower appraised values and that is what I was talking about with the gentrification. We had a house that is sitting there with no value and about to fall down, but if someone comes in and starts building and the values go up, but the people that are still residents there, they do not understand that their values go up and your property taxes are going to go up. That becomes an issue to even through that gentrification process to educate further.

Comment 67: What he was saying in terms of the values and safety mechanisms that go into these communities in order to change you have to start with the communities themselves. When they are selling those houses and the people already in the community, what is going to cause the property values to go down is the lack of maintenance and keeping the house up and the curb appeal. So, when you are selling the house and making sure that they understand the importance and that goes back to education and home buying. The importance of owning this investment and it is an investment to you and keeping it up and that is what is going to keep your property values up. Sometimes they do not connect those two.

Comment 68: I think we do. Relatively speaking. I think we talk about that, but again you can't force the people.

Comment 69: No you can't. It is all about education. Everything is tied back to education.

Comment 70: I think there is a generational issue there. A lot of Hispanics and African Americans are still first time homebuyers in their families. So they haven't had the example. Nobody has shown them how to take care of a home and when the trashman comes on Monday, the trashcan doesn't stay out till Friday. Little simple things like that.

Comment 71: Back in the day that was part of the first time homebuyer counseling that we used to have. Certification back then was to teach them how to become a homeowner as a first time homebuyer.

Comment 72: We still do.

Rob Gaudin: If I may interject here we are trying to advise the city department with who get CDBG and HOME, how can they make a contribution. This is really for them. What can they do?

Comment 73: What Mr. Gaudin is getting toward is we have to write a grant application every year in order to get our CDBG and HOME for downpayment assistance. We certify every year that we are affirmatively furthering fair housing. We, just this past week had a monitoring visit from HUD on civil rights and accessibility issues and they are checking to see if we are meeting our certification. So for me as the compliance person, I am looking for some widgets that I can measure and count. Specific things that I can have and do annually every year that is saying this is what we are doing. I think that is what Mr. Gaudin is trying to get toward. We currently fund housing counseling programs and we do the Downpayment Assistance Program, but I think he is getting at those kinds of things and this is a great discussion. I do want you all go where you want to go, but I guess we are trying to get towards something in order to meet the HUD requirements. Operationalize and make it done into a...

Comment 74: You want some nuts and bolts.

Comment 75: Yes.

Comment 76: I'll give you some nuts and bolts. I guarantee you one of the reasons you do not see more of the Downpayment Assistance deal in these so called poverty type neighborhoods, because if you go like the Northside, Southeast side, they are old frame houses. If you try to go in there the electrical, plumbing and what have you. I as a Realtor®, I will tell the people that this thing is hard enough as it is, but with an older house like this there is no telling what we are going to come up with when we do the inspection. So, I advise them that when we put a house under contract that you have to put down a certain amount of money. You are going to invest at least \$300 or so for an inspection and then only to find out that you may need to cancel this deal.

Comment 77: Because of what you mentioned the Downpayment Assistance Program does not include rehab.

Comment 78: Maybe that is one of the changes that could be. If you buy a house in a certain zip code there would be a certain amount of dollars set aside for rehabbing because your lender isn't going to let you do any escrow or holdbacks. Those days are over. If the program itself allows for a certain amount of money set aside for some rehabilitation and work with the lender in terms of getting those guidelines in place and sharing what the guidelines are for those funds and what is required to be fixed on the house in order to make it in the first 60

days. For the lender in order to lend against it you have to make it habitable somewhat. Not a 203(k) not just 203(k) per se because those monies...

Comment 79: That is not what I was about to say. What I was about to say is to your point about some of the older homes. I am working a project right now and some of it has to do with being selected and identifying the ones that still have the good bones that are in the neighborhoods poverty zones. Where you can get the Downpayment Assistance money and you can use a lender that will do a rehab loan.

Comment 80: 203(k) and that is the only rehab loan out there.

Comment 81: I am not disputing that, but I am saying to the point of how do you get more people who are interested in affordable housing. When you are in the old neighborhoods than that is affordable housing. Talk about predatory lending, sometimes the new first time homebuyer has to go somewhere else because they do not know about the opportunity to be in the neighborhood empowerment zones, to get a rehab type loan, to go get that house with the beautiful wrap around porch that needs some work on it because no one has explained the value of moving into those old inner city or central cities communities any more. So they think that they have to go north.

Comment 82: They have to go through counseling before they receive the funds.

Comment 83: They can't talk about any lender.

Comment 84: No they can't, but they can talk about what is available and what is available to them if they did do certain things.

Rob Gaudin: If the city were to implement some policies what would those be?

Comment 85: One thing I am thinking about is getting new homeowners in neighborhoods, but also I feel that we talked about the curb appeal. The investment and I know you have had the homeowner rehab program in the past, but it might be a good thing to bring back because we are helping the neighborhood. Then you see values going up. So now you have private capital coming in and investors.

Comment 86: People back into the neighborhood where they do have pride of ownership rather than the investors.

Comment 87: Curb appeal makes it look better. Then prices go up and people want to move into those areas.

Comment 88: I think that one thing that maybe the city should consider, if you are not already doing it, is maybe partner with some of the organizations in the neighborhood to get the word out. Check out in certain neighborhoods, who is the driving organization. Maybe it is a church or social organization or a civic organization, but to partner with some of those organizations and do some training to get the word out. The only way to do that is through education. That is the only way that you are going to draw them back in and really do what you are going to need to do. You have to get them educated and you are going to have to start within the neighborhood; whatever the driving force in the neighborhood.

Comment 89: I would say that if you are going to mount any kind of an effort for greater awareness or education you need to put in to backend support. If you are going to drum up a bunch of business and...

Comment 90: That is why a lot of lenders come and steer them away from those community programs.

Comment 91: What I am saying though is if you suddenly launch this campaign and the phone starts ringing off the wall and you double the number coming in and stuff.

Comment 92: Remember that those people have to be approved by a lender before it goes to the city. I have been doing this for 25 years and six years ago we saw a whole bunch of folks that were predatory lenders. Most of those people are gone and they are not gone because it wasn't good business. They are gone because they can't sell their loans to the big banks. Dodd-Frank has changed a lot of that. We do not see as much outright predatory lending as we used to, but on the other hand and I would argue this with anybody, it is much harder to get a loan now. That is why those figures when you go from 04 to 11 you are talking about the damn breaking in 2008. It is much harder for people to get a loan. Whether you are moving into an inner city neighborhood or you are moving on the Westside. It is much harder to get a loan.

Comment 93: It is just as hard for the white persons and the Asian persons to have gone through that same period, but they are more credit savvy. That is the thing.

Comment 94: Well and there is more cash.

Comment 95: I want to share some things with you and probably if they come to pass will affect the housing market period. There is a movement to make FHA only available for first time home buyers period. There is also a movement to do away with and completely shut down Freddie and Fannie. There are only two countries in the world that still have 30 year loans and that is the United States and Denmark. The rest of them have five year or usually ten year at the most. We are the only two countries left that still do it and there is a movement afoot to get rid of that. So that is going to affect the future and anything that we are talking about today. So you need to stay on top of your congressional representative and your senators to make sure that they don't do that. Some of them think that it is ok to do it. To get rid of it.

Comment 96: We have a policy statement on our website about what we know.

Comment 97: Can we make it a requirement for everybody sitting at this table to say something?

(Laughter)

Comment 98: As a lender what do you think?

Comment 99: I disagree with what you said. I have a few loans that have failed to fund due to inspections and these are qualified buyers. They have good credit. They are first time home buyers. They have everything that is lined up and they are good to go. It is just at the end we tell them the only way we could do your loan is if you don't go through the downpayment assistance. It is a shame to have to go to a buyer as a lender, because you are there to help.

Comment 100: What was it you said the inspections?

Comment 101: The inspections. They want to be done with it. They want it closed. That is what I mean. I agree with it. As a loan officer I have a lot of Hispanic first time homebuyers and that is the bulk of my business. I do take the time to sit down with my buyers and educate them and walk them through. We are there to help. That is what I am always telling them is that we are there to help. It is a shame to go back to the buyer and say never mind you are going to have to consider whether you want to buy a house with the Downpayment Assistance Program or not. The problem is that a lot of these buyers do not qualify for much, maybe \$60,000. So they qualify for very little and they are restricted to certain areas. So you have for example a \$60,000 per qualification and they want the downpayment assistance.

Comment 102: Right now I work with a lot of folks who go through the Fort Worth Housing Authority Section 8 Voucher Program and I have we can't find them a house. In this market if you try to find a house on say Westside or north part of Fort Worth. Those maps, the way you see them break out is they are newer construction. So we always go for the new construction low maintenance homes especially when I have a single mom. I ask where do you want to be and my recommendation is let us get you a newer home if possible. The school district is always a priority. So we always end up north of 820, Westside or 76123 or 76133. I show them what they can get in the city as a whole, but the problem is Meadowbrook. Great homes. The only problem is that these homes were built in 1950's, 1965 and there is no telling what we are going to find when we do the inspection. Do you want to burn \$300 on an inspection and go through all of that time and process and maybe cancel the deal? No way, beside I don't want to be in that deep.

Comment 103: We have run into the problem with older homes that the insurance has really knocked their ratios out of whack and if that house had any water claims then you really have difficulty finding any insurance. So we run into that problem.

Comment 104: So it is a complex thing. You have economics, you have age of the properties, and you have cultural things.

Comment 105: What I am hearing you say and just to summarize the sense of the group is it would increase fair housing choice for all populations and allow for more dispersion of the population if the HAP program had a component like the old NSP program did, which was the stimulus which was the \$5,000 for repairs. So that would be a widget. I am not saying that my boss will buy it, but...

Comment 106: I work with a lot of people trying to go through the NSP program. You take an old house that is affordable and \$5,000 doesn't even scratch the surface.

Comment 107: But what was going to go with it?

Comment 108: \$5,000 is all I have is a minimum of \$2,000 to put in there.

Comment 109: You can get the major things that are keeping them from being repaired.

Comment 110: I would respectively disagree with that. I have seen it too many times.

Comment 111: The real bad house...

Comment 112: That is not the point. If you don't have it, you don't have it. I mean that program when it was launched, we had a ton of people and you probably did too. They came in there and it was all great except the two things that didn't work. The houses that were in good shape they were bidding against the population of Wauhatchie and they would lose. The houses that were not in good shape, they didn't have the money. The \$5,000 didn't even scratch the surface in terms of taking care of them. The average house in Fort Worth that is foreclosed on right now and I do not have figures to dispute this. I'll bet you the average house that is being foreclosed somebody has missed six to eight payments at least. So there is no maintenance done.

Comment 113: I agree. I know one where they missed 36 months and they were just foreclosed on last month.

Comment 114: I think the \$5,000 and I am basing it on our experience. \$5,000 is better than nothing if I win a lottery ticket and if I get \$5,000 instead of the Powerball, but if I have \$5,000 and it is going to take \$15,000 or \$20,000 to get the house to the point...

Rob Gaudin: I want to ask you. The city can change any of its policies. Any of these questions would have any effect on what you are suggesting? Maybe we need higher density. Can we make some changes? A lot of the people from the survey talked about code compliance problems and certain areas of town where there is none. There are parts of town here where there are lots. Is there anything about this that could change this?

Comment 115: I think property tax policies could be changed. We pay very high property taxes. Fort Worth has one of the highest urban property tax rates in the state. We just in Texas pay high property tax because we do not have a state income tax.

Comment 116: The only thing that I see also if you want widgets is sometimes the lender is willing to make the deal work is go to 43 percent, you have a great deal otherwise. Shot down at 41 period.

Comment 117: They can't do that with the HAP program though.

Comment 118: Most lenders are using 45.

Comment 119: What I mean is the HAP said that is the standard for the front end and the backend.

Comment 120: If the lender is willing to do it.

Comment 121: The lenders are willing to go to 45. So the program and that is the problem that I have run into. We will approve the loan to 45. Then we can only go to 41 or 42 with the other program. That is a hindrance. That would probably help to use the program before and the speed as you mentioned before.

Comment 123: Requirement is 34 or 45 and the foreclosures not higher.

Comment 124: You have to look at the economic base in Arlington. Are you talking about those people moving into those areas? Big bucks.

Comment 125: What I am about to say is probably going to come across as ridiculous but what...

Comment 126: It won't be the first time.

(Laughter)

Comment 127: I say ridiculous things all the time, but as far as the city property tax. If you look at a person who is going through the First Time Homebuyer Program, how about cutting them some slack on the city property taxes? They do it for big business to get them to move in.

Comment 128: Or redevelopment.

Comment 129: You might run into some issues on the lenders side.

Comment 130: Cut some slack on the property tax and you give them a five year reduction and then it wouldn't automatically jump up to where it should be, but it's gradual after that I don't think you would run into a lender...

Comment 131: You can attach MCC credit to...

Comment 132: That might help.

(Inaudible)

Comment 133: I can't imagine doing that in Ridglea Hills for instance, but I could see that working in certain zip codes.

Comment 134: We are talking about residential. I don't know if you have another focus group for commercial?

Rob Gaudin: It is all about the residential housing.

Comment 135: I think commercial has an impact on residential or a lack thereof. Some people will say that if you build the houses the businesses will come. Well the Renaissance Square redevelopment project out on 287 is a perfect example where it is in an inner city neighborhood and you have some commercial building and that is another thing in terms of what people are looking for and they are going north or south. They want great shopping. They want parks. They want convenient banks. They want grocery stores. They want those things that are convenient and for the most part you don't have those and that is another negative in some of our affordable communities.

(Presentation)

Comment 136: To bring people back into the city?

Rob Gaudin: Areas of opportunity. We are present those kinds of concepts where we have good schools, grocery stores nearby and things like that. Open to people who might not have access to these areas of opportunity. What I am asking you is to what extent could we modify or what ways could we change?

Comment 137: I think the zoning becomes an issue in terms of what you can and cannot do. In an inner city neighborhood it seems like every time we get new city council people it seems like we go back through the whole process of rezoning in their areas and particularly in the inner city areas that they council over. If we could look at the zoning laws to attract small business owners to build or have their businesses in the community again you are talking about conveniences. I am talking about businesses like pharmacies and doctors' offices. Things that we used to have in a community you had bakery, a cleaners, everything wasn't so commercial. Some of those small businesses that could be in a community that provides the same service. People are going back to. They do not like necessarily going to the big Wal-Mart's. They want the boutique places to go and get those specialty drinks and specialty items and so I think there would be an incentive offer to business owners to maybe come into some of these areas.

Rob Gaudin: You have mentioned zoning. What did you have in mind?

Comment 138: Well in some areas you can't have certain types of uses for commercial and residential you can't have a duplex in certain areas of town anymore. You can't have mixed use in certain areas. You can't have a high-rise in certain areas. Those are things that people want. So when they are restricted from being in that neighborhood except those that are grandfathered and about to fall down. Lofts are downtown, but young professionals that are going to be working for another 30 or 40 years they like that. They really like those lofts and so in certain neighborhoods you are restricted from building commercial types of industrial...

Rob Gaudin: Mixed use density.

Comment 139: Those are ways that I think could attract people, a different population of people and making businesses more attractive.

Rob Gaudin: What about accessible housing? What do you see in the real estate industry? Are there limits there?

Comment 140: Affordable housing is a big issue.

Rob Gaudin: Accessible.

Comment 141: What do you mean?

Comment 142: ADA compliant.

Comment 143: Physically accessible for persons with disabilities.

Comment 144: I think the builders are taking care of the most of it.

Comment 145: That comes into play more in the rental market. I very seldom run into a situation. If someone is going to buy a house they go in with the idea that they are going to modify it to their liking. Typically, when it is a rental property and that is an area and right now it is such a tight rental market. When you have people that, most management companies are going to require a credit check and a background check. I would imagine that is also the number one reason that people can't rent a house in a nice area. So, you go back and deal with a landlord that is willing to deal with cash or even take a tenant without ID. There are some people that will come and say listen here is my family, I have a carload of kids, and they need a place to live and they have cash in hand. I will rent you a place right now and how much do you want. Those are things that are out there.

Comment 146: You may not know, but at one time the city built a lot of houses mainly in the Stop Six area, Summit, Poly. What do we know about those buildings? That was what ten years ago?

Comment 147: It hasn't been that long.

Comment 148: I bet it has been eight or ten. What do we know about? That was done for all of the reasons that we said. We will build these houses in an area where nobody is building.

Comment 149: To try and create a market there. There was a big emphasis on that.

Comment 150: What was the result of that.

Comment 151: You mean institutionally or in the projects?

Comment 152: I guess one my problem is that in this city and it is true of all cities, we reinvent the wheel all the time. We have a project because there is government money and we build houses. Then eight years later somebody comes up with the idea to it. It just bothers me that we do not track that.

Comment 153: My understandings of the largest number of units that we constructed were through the Housing Finance Corporation. It is a legal entity and it is separate from the city and the largest numbers of units were actually in partnerships with developers. The city itself did not build the largest number of units.

Comment 154: I am just wondering what do we know about those properties?

Comment 155: There are a couple of things at hand based on my general knowledge. In some areas there was pushback from the neighborhoods, because they didn't like the types of homes that were built and in some areas the developers found that the market was not as strong. In some places it was and some places it wasn't as they had hoped. I think the other thing is that we went through some institutional changes, some changes in leadership, and a different focus. Frankly that is why I am a compliance manager. We had some compliance challenges and that become such that we were only able to leverage those things because the federal funds became at risk frankly. So we had to narrow our focus. I think that our director and our assistance director are always looking for those developer partnerships. I am familiar with ones that are talking and I can't disclose, but I know that they are looking for partnerships and are

always seeking those opportunities. I know that one of the things, the commercial developers you mentioned Renaissance Square and the Wal-Mart's and the West Rosedale area and the vast amount of funds the city has invested in that area. One of the things that my boss always hears is that we need the rooftops. Are you familiar with the Social Compact Study? That proved that there was the revenue and the money in those inner city areas that was going elsewhere. So that is where she is very correct about needed those small businesses. They blend with each other. So what I will say is that there is probably a lot more behind the scenes seeking those partnerships than maybe visible. She was saying the other day that is what they spend all of their time thinking about how can they make the private money come. We have about two-thirds of the federal money than when I came to this city nine years ago.

Comment 156: I guess that is one of the things that I am alluding to. Obviously any steps the city takes are going to be cash strapped steps. They are going to be more in the form of advocacy than cold hard cash.

Comment 157: We do fund Housing Council right now. We do have the Downpayment Assistance Program; we need to do things that are cost affective.

Comment 158: I am talking about things that spur...

Comment 159: It is all about partnerships. It is all about leverage. The efforts that our department is doing in terms of the real property, you mentioned the foreclosures and the demolitions and trying to turn around those properties and get those back on the market. There is really a strong emphasis on that. It takes time, but I think there is a lot more happening behind the scenes than you realize.

Comment 160: I think that is part of the problem. Why is it behind the scenes?

Comment 161: Because it is real estate. The very nature of real estate is...

Comment 162: I am talking concepts. You shared some things that I did not know that were going on.

Comment 163: I think that they have been public knowledge in terms of the head committee, the Housing and Economic Development Committee and City Council. So these kinds of concepts are brought to the city council. You are right. They are not in the newspaper, but I guess from my experience our department has had a very very strong compliance focus for the last few years because we were in serious trouble with HUD and the funding was at risk. Maybe I am being too honest. Those efforts are there, but I think that the leadership we have right now is very focused on partnerships with the private sector to do things like Renaissance Square, to finalize the investment with West Rosedale which are the kinds of things that Mr. Gaudin was talking about brining investment back to the central city. Does that help at all?

Comment 164: I want to go back and answer the question about some of the homes that were in Stop Six. Some of those homes were finished and a lot of those homes people moved into and they were happy. Some of them had predatory loans. That is reality. The other reality is that some of those homes had to be rented. So the properties were finished and they started to use them as homes with the Housing Authority and were able to get some of those are rentals for subsidized housing. So I know that in the Eastside that is what happened to some of them. After some of the issues started with HUD and some of those partnerships went away, the city or the partner or whoever was afraid to try anything different because it is like their head had been slapped and we can't do anything. I don't think that was the answer. I think the answer was that we need to do something differently, because we absolutely have an affordable

housing problem in the state of Texas, not just in Fort Worth. We have an affordable housing issue. Again, those inner city communities health and those communities that the city is foreclosing on for tax purposes. I am just being honest. That we keep for your friends that come down on the first Tuesday, I am just saying, that what we may need to do is to get those properties in the hands of first time homebuyer or a small business owner looking at zoning changes. Maybe that little house can be turned into a bakery or a barber shop or a cleaner if the zoning laws will allow it. Those are the types of things that I am saying. Instead of just selling it for a few thousand dollars, the city gets for future growth that goes in line with gentrification. I am saying look at possibly working with your colleges, your chambers of commerce to see what small businesses would like to stay in the community. There might be a doctor that wants to come in and set up a clinic in Poly or on the Northside. What is the benefit? We are getting rid of all of these houses or we are tearing them down or we are making sure that our friends are getting them. I am saying lets invest it back into the people.

Rob Gaudin: What is really an interesting focus here is acquisition and focus of production. I am going to be completely honest with you that is a small part of affirmatively furthering fair housing, but not the only piece. It is who gets the new production. Who gets the rehab and how those projects are distributed throughout the community. Who gets them and how poverty is dissipated and how you lower rates of ethnic concentrations. Fundamentally the challenges we figure are that there are pockets that have dilapidated housing and you have to figure out which ones are high grade. They might be worn out, but they were constructed with high quality materials. Those are all the challenges we face. I think we are spinning on the production thing. I want to thank all of you very much for coming. I want to focus our future on how we can improve access for those who might not have had as good of an experience through renting or buying. Education, historically however long there have been loans. Historically education is a function that we may be better to play a stronger role for our first time home buyers, but is there something else that we can do to help them in their choice so that they do not feel discriminated against or feel steered to a certain area only. I didn't really hear you talk too much about that.

Comment 165: That is what I am saying. Those are issues and it is definitely a cultural thing. I don't want to live here because I saw this kind of people here or there, but at the end of the day if I have someone that is looking for a \$70,000 house, I say here is where the \$70,000 houses are. They are not north of 820 for the most part or pretty much anywhere outside the loop. So the economic factor is a huge part of it. Then the school district is the other. One partnership that I would love to see the city of Fort Worth strongly go after is with Fort Worth ISD. Eagle Mountain-Saginaw, and Northwest ISD every year they put on a big luncheon and they specifically invite all the Realtors® and they do a very progressive and impressive PowerPoint presentation. Here is what we are doing as a school district; here is all kinds of variety. People love that. So Realtors®, so when someone asks up about Eagle Mountain-Saginaw we know what they offer, but with Fort Worth ISD all I hear is that we do not want to be there.

Comment 166: We have an already built in defense of Fort Worth ISD. A lot of the new build is going out to those school districts that were a part of the old Fort Worth, but there is still a lot of the new build going on around there. It is not as important to tell a person or a resident of Forest Hill or Rolling Hills or Ridglea Hills some of these older communities what is going on because nothing is going on. What is going on is in the outlying areas of those old inner city communities.

Comment 167: There are a lot of really good schools in the Fort Worth ISD.

Comment 168: I am not disputing that. I am saying to your point. I am a product of Fort Worth ISD and that is what I am saying in their defense. That those types of meetings that you are talking about would not necessarily be of much benefit because of the new stuff that a real estate professional would be concerned about would be on the outskirts.

Comment 169: What I am talking about with ISD itself working in conjunction with the city to promote a better image. To promote some of the good things that they have going on to get people to stay in Fort Worth and to stay in the inner cities.

Comment 170: They are doing that. The mayor has some company that works with ISD. The Realtors® have a group of folks that work with the ISD. There are several organizations that are working with the ISD that are getting information, providing information to help the ISD improve. I think the image has improved somewhat and a lot of it is perception. If you do not live here and I tell you the Fort Worth ISD is a lousy school district and you move here. You move here with that perception that it is a lousy school district and you don't bother to investigate it or bother to and do not what to hear anything about it. That is just the way that people are, but they are working in conjunction with the city and the real estate organizations to change that image. They are doing that and I think that eventually they will get there, but until that happens we just have to as real estate professional talk about the schools and whatever school there are going to be in find out about that particular school and provide that information to them. That is the only way that that is going to change. We just can't sit back and wait for the people that are buying to figure out, because they never will.

Comment 171: The builders are not exempt from this discussion either in terms of looking at how and where they are going. Certainty they are in the business of making a profit, but again all the new builds are going outside the city limits of Fort Worth or outside ISD. There has to be some discussion with the builders on redeveloping some of our inner city neighborhoods and giving them incentivizes as part of the same thing that we have done for developers in the past. Whatever that is abating their taxes to help redevelop some of these communities and also to work with the schools. Maybe some of that is you are building 15 houses or whatever in a small little area that has been cleared because all of the houses were demolished. Then we can help defray some of your taxes, but there is so much that you have to do with the PTA or whatever as a part of that. One other point that I want to bring up in terms of the Southside is we just had that project over in Terrell Heights. I think that those who know me in this room know that I was totally against it. That is where be built those 54 rentals and the people have the opportunity to live there for 15 years under the assumption that they will be able to purchase it in 15 years if they do not have any negative things on their credit or a criminal record in 15 years. Things like that when we agree to do things and convenience all of those people that we are going to improve their property value. What benefit did we just give to 54 families some of hope that in 15 years they are going to be homeowners? That is ludicrous. We need to really look at what we are doing. When you are looking at the professionals coming to the table and the residents in the community to really explain what is going on. I dare say that very few of those families will have issues that will determine whether they can buy that house. We went in hoodwinking that there is a great value at being a renter for 15 years. We know that is not true. We are professionals. That is not going to happen.

Comment 172: The idea is in 15 years that particular neighborhood, that the people that live there now will not be able to afford it.

Comment 173: That is correct. We know that that is a part of the gentrification process. We need to be honest. I know that is hard.

Comment 174: In a nutshell when you are talking about accessibility or discrimination or whatever you want to call it. There is some of that. It is human nature, cultural, whatever you want to call it. I think that the biggest deterrent that are in economics and being able to get a loan, how much money do you make, employment, credit and so how do you fix those?

Comment 175: Education.

Comment 176: That is a good place to start, but as for everything. I could even propose that people that are required to take the homebuyer class that they are required to take a class once or twice a year after the loan.

Comment 177: I was thinking the same thing.

Comment 178: There is one problem with that. You have absolutely no pressure to apply to them.

Comment 179: You could tie pressure to that. I guess I was like we are given the money for the downpayment and closing cost and they are required to do that pre-purchase. There may be some that you do something else in order to satisfy.

Comment 180: There is a five-year second lean and we are supposed to be doing and we follow up to verify ownership. This is pushing a button for me and marries it back to the follow up for ownership somehow.

Comment 181: Education after the sale is over should be required because they do have that second on their home to turn in a certificate in the next two or three years to show that you have taken a class and the next 24 months you have taken a course or you will be required to pay the money past the five years.

Comment 182: After the five years, they stay in there five years they do not owe that money anymore.

Comment 183: I just don't think. I have talked to too many people about post purchase. It is a wonderful idea and I would love to do it, but it is just not feasible. You can ask people to do this, but you are not going to get the city to foreclose on the Jones because they did not provide the certificate.

Comment 184: You wouldn't foreclose, but you could tie it too that lean.

Comment 185: How do you do that?

Comment 186: That is what we are going to try to figure out.

Comment 187: That is just a monitoring problem.

Comment 188: That is a monitoring problem, but there are ways to do it. You could extend their loan for a year or something. There are legal issues.

Comment 189: You say that if you take counseling you are forgiven in five years. If you do not take counseling it is a nine year or a ten year.

Comment 190: Would HUD allow you to do that?

Comment 191: I can see from a lenders perspective that that is a foreclosure prevention tool that makes your loans more secure.

Comment 192: The lender is going to sell the loan anyways. You have portfolio loans and you control those. They will sell. It could be sold five times in five years.

Comment 193: The city got paid back during that time. In that five year period that lean shows up on that title and it must be satisfied during that time if it has not meet that five year term. Even on our refund.

Comment 194: I think you would have to get that by HUD since that is federal money.

Comment 195: I think it has to do with how they write the grant.

Comment 196: It is worth a try. It is going to make a difference to a more solid homeowner and you are going to have a person that keeps the house longer. Plus it will help to prevent foreclosures, it is clear.

Comment 197: I don't know how you would address this, but I get this a lot where people call me wanting to buy a house. I talk to other real estate agents and they are like man you are doing a \$40,000 deal. Why? So, in other words if that is how you make your living as either a lender or a realtor, you have a chance to go after a \$125,000 or a \$150,000 sale or more and typically that kind of buyer is going to have electronic everything. Email you this. Email you that. Then you have your \$65,000 or \$70,000 buyer and you have to piece it together for them.

Comment 198: But they are so excited at the end.

Comment 199: I got a letter from this. What is it? A lot of these people just by virtue of the top economics and so a lot of Realtors® say that is just not their market.

Comment 200: I think you have a lot of folks who are in the business for all of the wrong reasons.

Comment 201: They are looking for a home and they do not want a but.

Comment 202: I don't blame them. It is there job. They are trying to feed their family. It is a business.

Comment 203: Here is what has always happened in my 46 years. Those folks that you see that will only look at \$150,000 when the market drops and all that is out there is the \$50,000, \$60,000, or \$70,000 you see signs for sale on property that you have never seen in your neighborhood before. A lot of people are in it for the wrong reasons. Everybody has to make a living, but you have to be...you have to love what you are doing and you want to help people.

Rob Gaudin: How do you teach your other peers in your industry to have that value system?

Comment 204: I think that is part of the education. Here is an example, there are a lot of agents out there and this is a sellers' market. There are a lot of agents that do not understand some of these programs. If you get an offer on it they do not know how to represent.

Comment 205: They will just tell you that their seller is not going to deal with it.

Comment 206: The reason the seller is not going to deal with it is because they do not know how to deal with it, the agent. That is a fact, if you submit one. You know it will take with the city. They need 30 days after they receive it from the lender to process it. So if you are actually 60 days in there for foreclosing and you explain to the agent when you get that contract back they are going to cross through that and they are going to cut it back to 30. They just do not know what they are doing and they do not listen.

Comment 207: In this market and you are a seller with a nice clean property like we all want and you get two offers and one says 60 days and one says 45 days.

Comment 208: I am taking the 45, if I am the seller. What I am saying is that the agent doesn't know how to explain the process even if it was a buyers' market. The agent still doesn't know how to explain it.

Comment 209: Let me be devil's advocate to your point. If it is a seller who is not in a rush and if it is a seller who also has some passion that they have discovered as your real estate professional; they may take that 60 day when they realize they are helping a first time homebuyer. Some of them will. My point is we were out at Colonial a few years ago when that came up and one of the agents was going on and on about the housing program being for poor people. Your \$200,000 property buyer can use this. What are you saying? So I absolutely agree with what you are saying. They see it as for poor people. It is not. It is very much in step with the HUD income limits. If you have a customer who wants to buy at \$225,000 and he can qualify for that I can still use the HUD program just like I can use it for the one that is \$60,000.

Comment 210: Depending on the housing size and the income.

Comment 211: Sure. I said if all those other things meet, but the idea that it is just for poor people is ludicrous. A lot of people equate that it is just for poor people.

Rob Gaudin: So it comes back to how do you inform your peers?

Comment 212: Marketing, marketing, marketing.

Comment 213: Everything comes back to education.

Comment 214: Does the Board of Realtors® need more information from the city. This is how our HAP program works.

Comment 215: If you want to with the HAP program that is definitely the way to do it.

Comment 216: I am wondering about the larger issue of deconcentration of protected classes and using the HAP program to do that and would this help at all. I understand your business comparative and I am wondering.

Comment 217: I think if we reached out to a lot of the small brokers that are hungry and want the knowledge and want to do these programs.

Comment 218: Brokers and lenders.

Comment 219: As supposed to some that are at very large firms who are maybe if they had one that was under \$150,000, they probably wouldn't think much of it and send it to somebody else. I think reaching out to the small brokers and lenders would help.

Comment 220: Also with community organizations that were mentioned earlier.

Comment 221: I think we used to do a lot more outreach, but with budget cuts we have not been able to. We use to have the whole Housing Counseling Program in house and now we contract it out and rely on them to do a lot of it. Again, they haven't been given a business model on housing counseling and there are probably some elements that are not done anymore because we do not do it in house. My boss sees the advantage of having more partnerships with Habitat and so on instead of doing it all in house. Our focus needs to be to ensure that the money keeps floating in and the compliance and not to spread ourselves too thin doing too many things. I am hearing that this might be an opportunity to address some gaps in information and figuring out how to do that.

Comment 222: You just need to make sure that you do not over sell.

Comment 223: Yes, we still have limited funds.

Comment 224: Other words target marketing is what you will have to do with the real estate professional. Lenders are...

Comment 225: Again, you said that the bigger picture here or the key point we are trying to hit is deconcentration.

Comment 226: OK, the larger issue is affirmatively furthering fair housing to the degree that people may be limited to their fair housing choice or they perceive themselves as limited that they cannot go over here. If they have a Realtor® that works with them that increases their options and their choice.

Comment 227: The real estate professional that understands.

Comment 228: Exactly. So the client doesn't experience the same limitations. The professional that is helping the client, the lender that is helping the client understands there are tools to help overcome any barriers. That is what we are regulatory and statute required to do is remove those barriers, reduce those impediments, and I guess I look at it as concentration. If you have concentrations of a minority populations and protected classes, we do not want to have any policies in place that are enforcing and encouraging that to happen. We want to have policies that encourage deconcentration or freedom of choice. More choices. If someone wants to buy in Northside great, but if somebody is not buying in a particular area because they feel like I am not welcome there or I can't get a down payment or whatever then that is the barrier that we want to try and move.

Comment 229: One of the points that I always try to make when they ask me if this is a safe neighborhood, like I am supposed to say that you will be totally safe here. I tell them that the best suggestion that I can make is I do not know if the police department has statics or...

Comment 230: It is on the website.

Comment 231: You can find the full report.

Comment 232: It gets you off the hook too. I tell them the exact same thing. Go and check with the local police, because I do not really know. It is just like they will ask me if this house has any issues. I do not know.

Comment 233: I wanted to mention something else on the rehab situation. I know we used to have trees and stuff that we gave out to certain communities and neighborhoods. That is another benefit of your existing homeowners particularly the poor. They just can't do anything a lot of the time. They become disabled or elderly. Try to work with them. Maybe go give them a new tree or use some of that rehab money to make sure that they know they can go get a new toilet that is energy efficient and maybe paint their porch. Little things like that help where there are other houses to increase interest in building in the inner city. If the neighbors' homes look ok or they may have some interest to a small developer to build on those three lots and put three more affordable homes over there if they can look over and see that it is not falling apart. Little things like that can be a very limited expense. It is not a part of the Housing Assistance Program, but we do have that program that we have had before. Maybe expand it in that way that we are also looking after our poor and our elderly to help them with the property that they already own.

RENTAL MARKET FOCUS GROUP

Comment 1: I would have to know what side of town is that. What I see in placing some of my families in different places in Fort Worth. I find the Eastside of Fort Worth their rents are a lot cheaper than the downtown area or the Southwest side of Fort Worth. So, I am thinking it has a lot to do with the rent amount.

Comment 2: I am also thinking that in addition to that as people, as families, people they know move into a certain area they tend to go into that area as well. Once a group starts and then when rental units become available there than they try to go to that area as well. I do not necessarily think it is steering, but going where their family and friends are moving too. That is what I hear people say.

Rob Gaudin: So as you as a provider can you site your places pretty much anywhere you want?

Comment 3: Well, no we can't. We have several issues. I thought that this was just the general population, but if we are just looking at assisted, people who receive rental assistance. Of course if they receive vouchers they have the right to go anywhere that accepts the voucher. We try to educate families as to where those areas are those low poverty areas. What we find is people want to go where their support system is. They want to go where they have family. We know the services that they need to have. We have different segments of families we serve. We have homeless people that need to be on bus lines. So there are certain needs of the different populations. Generally speaking I think people want to go where they have the support system, but we can't. When we want to build the Housing Authority and try to build properties we have to get the support of our constituents in that area. We have to get support of the neighborhood as well as the elected officials. It is not as easy. We are trying to build something for a certain population, but when people have vouchers they are able to go around it. We can't steer people away or to a certain area. We do monitor. I do reports every month especially of multi-family properties. What the concentration is and we look at that. We do not want it to get over a certain percentage. Our threshold is like 20 percent, but we can't do anything about it. Once we see people go there we want to promote housing choice.

Rob Gaudin: Here is a map of vouchers. How come vouchers are not being used elsewhere in the city?

Comment 4: How come vouchers are not being used?

Rob Gaudin: These blue dots are vouchers.

Comment 5: There are several family factors. I just sent some information to the city and that is probably where that came from.

Comment 6: He asked for it to be able to map it.

Comment 7: A couple of things. The fair market rents in the area, because we are limited to what we can pay for rent. So people are going to go where the rents are within the fair market rents. Also, I believe that when we talk to clients that they want to stay in certain areas where they have a support system. That is what we hear more than anything else. So it is the ability, for us the Housing Authority to afford the rents in that area plus the client's choice to be in that area.

Rob Gaudin: So you would say if you were to pay more, would more landlords accept them?

Comment 8: Yes. I just received an email this week from a property owner who wants to serve our clients, but the rents that we will approve are not high enough. So, I think we would be

able to serve more in those areas if we paid more. As you know funding for rental assistance is going down. My position is we could afford maybe a few years ago we would have tried to work with the landlord, but our funds are limited. So as long as I have landlords in those lower cost areas that are willing to accept the voucher, I am more willing or inclined to promote that because we can afford it and it can serve more people in those areas. To answer your question, if we could pay more I think more landlords would accept the vouchers in those other areas.

Comment 9: I might have clients who go to the Saginaw area and look for places to stay, but you also get landlords and property managements that are not familiar with the program. So, if they are not really familiar with the program I will talk to them and sometimes they will accept it or no. They are not educated with that. In my program there is transitional housing and I get are you Fort Worth housing or are you Tarrant County Housing? I have to explain the difference that I am a transitional housing program. It is a 24 month program. That I also worry about if I have clients who do not have income and after your program is up what are they going to be able to do. So some of my families go for apartments and houses in different areas because once the program is up are they going to be able to afford this place? If we put them in a place where the rent is \$1,000 or \$1,200 that is not? At least we want them to be able to afford when they come to me homeless. I work with the homeless population. I am trying to get them self-sufficient in two years, but sometimes that isn't feasible.

Rob Gaudin: We are conducting a survey and we are reading some of the comments that people make. It is nice that it is anonymous and people can say anything. Some of the anything that people say talked about the homeless that they are concentrated in a certain area. Is this a good thing or a bad thing?

Comment 10: That is a challenge. I work with the homeless program with the Housing Authority. That is our biggest challenge. I was in an all-day training yesterday with HUD about the continuum of care and talked a little bit about the challenges they have because they are a hard to house population. Once you find a property owner or landlord that is willing to accept them, most case managers try to put their clients there because those landlords understand the population better. They have a better chance of being successful in a place where the property manager understands them. Many of them are not used to living in an apartment. So they may be more inclined to violate leases. Another person would just be evicted, but those landlords know to work with the clients. So on one hand it may not be a good thing to have them concentrated in a certain area. It is certainly not good for that neighborhood perhaps or for the city as a whole, but for that particular client to be successful and correct me if I am wrong, but for that particular tenant to be successful it is better if they are with a property manager that understands them. They really are a difficult population especially those with mental illness. I have some feedback from my staff to what they see. I do not really deal with clients firsthand so I go by feedback from my staff. People with mental illness many of whom are homeless that is the big sub-population that has the hardest time. So while it may not be good for them to be concentrated but we want them to be successfully housed. That is probably the better way to go. We try to promote and engage with landlords throughout the city, but why take that chance. This person might disturb the neighbors or cause other problems on the property. We really try to work with them. As with the general population we won't do that, they won't tolerate.

Comment 11: Let me talk about that from the other side, from the landlords.

Comment 12: I agree with you. Whatever you are about to say I probably know what you are about to say.

Comment 13: We struggle with this because as a very low and low-income housing provider that is what we do. That is our charter. We have taken people out of shelters and we have dealt extensively in the past with taking on some of their clients. Here is what we have discovered is that in almost 90 to 100 percent of those cases is that as soon as you lease them an apartment regardless of however far away we are from the Presbyterian Night Shelter and we have a property that is maybe five miles. All of a sudden that person we just leased to has ten buddies from the shelter that have sleeping bags and are living on the floor as opposed to the shelter. Our occupancy just went from one in a one bedroom to ten. So in the last four cases in the last year that we have dealt with PNS we have had to get the case managers to come out and let these people out of their leases and just beg that they be relocated. We will give your money back to you, but we can't have this here. I do not know if it is the clientele or their friends and they are really just trying to help out their friends, but that is our experience over the last 12 months with this. Back to your first map about populations, I have been around Fort Worth since the 1970's. So you can go back to the 70 Census, the 80 Census, the 90 Census, the 2000 and the 2010 and I doubt anything has hardly changed on any of those. So, I think in my opinion the population center the non-low-income population follows the economic development. I am sure that bit does that in every city where there are shopping centers; where there are nicer apartments; where there are nicer homes being built; where the developers come in or where the city allows for the economic development. You can see the Southeast side or the Southwest side of Fort Worth before that mall was built there was basically nothing. Then the mall was built and you have \$400,000 or \$500,000 homes and for profit apartment complexes and for profit businesses and so that economic development and the higher income follows that. If you were to look at the Southeast side of Fort Worth back to the 1960's Census you would probably see the same because there hasn't been or the city has not promoted to and the developers haven't come in to promote the economic development in those types of areas.

Rob Gaudin: Here are the investments you are talking about. This is the last 12 years of the Community Reinvestment Act. On the left hand side are the number of loans and on the right-hand side are dollar volume and look who is living there. Why is it not open to everyone? I am hearing you say that it is too costly.

Comment 14: It is and also when you have low-income families and the landlords are asking for twice their income or twice their rent amount, they can't afford that. I even have clients that pay 30 percent of their rent and we pay a portion and they pay a portion and they want them to pay twice of what their portion is and they do not have that. So there is a no right there.

Comment 15: I just think that you have to distinguish between the for-profit landlords. These developers that own these apartment complexes and they are in it for the bottom line of their shareholders. They are going to be less inclined to deal with Tarrant County Housing or Fort Worth Housing when they know they can get \$1,000 a month for a two bedroom, but the max rents that Fort Worth Housing might pay in that neighborhood is \$800. So why do that. I think what we have to target and we have some properties in some really nice neighborhoods. I have \$1,200 townhomes that I lease for \$700 because we are an affordable housing property. So, if we were a market property and a for-profit type of business then our rents could be a lot higher, but that is not our mission. We have a lot of affordable housing people: Housing, Grand Prairie Housing, Arlington Housing, we deal with all of these agencies and PNS, Shelter Plus. I think your real difference is the ownership of the entities. If they are for-profit type entity they are going to be less inclined to deal with that population then they are if they are a not-for-profit or some type of mandate that the government did back in the early 90's with all of this.

Maybe some of you don't remember, but when the government owned all these apartment complexes they decided not to build new affordable housing. They sold all these properties with some like 50 percent of this property has a 30 year mortgage requirement have to be an affordable housing unit. So 50 percent of the units have to be affordable or 35 percent or 80 percent or 100 percent or we are not going to sell. Those properties are scattered everywhere. You will find those in high end neighborhoods like Euless because we own two of them and you will find them in very low-income neighborhoods like Southeast Fort Worth or Northwest Fort Worth or in Saginaw. You will find them all over the place it what the Feds decided to do back in the early 90's when they were selling all of these properties.

Comment 16: You are talking about the S&L crisis?

Comment 17: Yes.

Comment 18: And which federal agency would have those leans securing that?

Comment 19: The Feds do. They are called Land Use Restriction Agreements. There LURAs on a lot of properties from the Feds or the FDIC or they are RTC or any of those. A lot of the properties that we bought back then and I managed a lot of those.

Comment 20: I remember all of that and this is ringing a bell for me.

Comment 21: Here is why the Feds decided to do it. Instead of going out and building affordable housing the Feds said in the early 90's we own all of these properties because we shut down all of the S&L's and all of a sudden the federal government owned all of these properties. Here is what we are going to do we are going to sell all these properties. They do not want to own anything. Here is what we are going to do is put a Land Use Restriction on this 200 property in Euless and when we sell it 50 percent of this property has to be affordable housing. We are going to cap the rents. We are going to cap the amount a family can make based on their family size. Then 50 percent of this one...

Comment 22: I understand. I was looking for the name so that I could research it and get it in the database so we could map it.

Comment 23: If you find the mortgages and the restrictions, all the properties that have Land Use Restriction Agreements that is what it is. That might help you try to figure out where the Affordable Housing is and Fort Worth Housing and Tarrant County Housing and Shelter Plus.

Comment 24: It is for the Consolidated Plan requirement that we are supposed to have an inventory of the housing. So, that is part of it.

Comment 25: Another trend that I have noticed from Housing Authority perspective is we do new landlord orientations once a month. What we find is people who are interested who come to us to see how they can put their property on our program. A lot of single family residences, those property owners, who were living in those houses themselves, but have moved onto better neighborhoods and bigger houses and they keep their properties and they decide to rent it and they come to us. We are finding more of those becoming available to families we serve too and that gives people more mobility living in different kinds of neighborhoods. If you come to one of the meetings that we run once a month and the room is always packed full of people who own one house who want to rent it to our clients. So that is a trend. I don't know where and I have not really done any studies to show how many of those actually get leased, but at least that shows the interest of those property owners.

Comment 26: If you would streamline that process a little bit and not make it so hard you might get more participation. It is very hard process to go through to get a new property approved.

Comment 27: I would like to get more information and any suggestions.

Comment 28: I get that a lot. I do the RTA, the Section 8, the lead based paint before 1978, and I do the W-9. That is all they have to do to sign up as a landlord. They were just like really in Tarrant County there is a mass of paperwork like this is all that I need to do? I get that all the time that the process for Section 8 is very long.

Rob Gaudin: You had mentioned a few moments ago when you were talking about homelessness and the concentration of them was not good but it seems to be the most feasible way to deal with the problem. A few years ago there was a case somewhat similar in New York, Westchester County and you are familiar with it. It was a county that had the same certification requirement because they had the funding for Housing and Community Development (CDBG). They decided that they had affordable housing problem and they spent their money building affordable housing projects, but they were sued because they put them all in the same place. They were concentrating racial and ethnic minorities and therefore concentrating poverty. They were found to be falsely claiming the certification so the one million they had spent building they had to pay back to HUD. Now the New York Court System tells them how to use their money. That is what happens every year. The risk here is that we are not acting in the spirit of affirmatively furthering fair housing.

Comment 29: I don't think, because I know what our laws are and I know best practices. How that may not be the best way to go, but I would try to look at it from both perspectives. I think ideally they need to be spread out. There should not be any concentration and my boss tells me that all the time and I do these reports every month and I see where people are living. So on the one hand they have a choice, but on the other hand if we want, particularly the homeless, to be successful they need to be in places where they understand. The example he just gave brings somebody from PNS and then they bring all their buddies with them. I just had to make a decision about one such case where we had to terminate their assistance because the property owner, the landlord, and it could have been one of yours because they wanted to evict the person because he did that. On the other hand I hear the case managers telling me that if you do that then this person is going to be homeless again, back on the street, and back in the shelter. So, I had to make the decision do we provide the assistance and let him go live somewhere else. They just move from property to property and eventually they are going to find a property owner who is not as forgiving and then they end up on the streets. So while ideally I agree with the courts and everybody else that they should not be concentrated, but if we want them to be successful they have to find a place at properties where they understand. I know that I am speaking for both sides, but that is the reality of it.

Comment 30: They need the community support. Transportation is a big issue. So some of the places where it is nicer properties they are isolated and they can't get anywhere. They can't get to the clinic, they can't get their meds, and they can't go grocery shopping. We have public transportation, but it is not everywhere and not in your nicer neighborhoods.

Comment 31: Maybe that type of clientele needs further information on how to play nice and how to play well with others. In a lot of these properties they have neighbors and we start getting complaints from neighbors. We have ten or 12 people going in and out of this unit every day or whatever. I do not know that maybe at PNS or some other shelters they can go through this education. You are fixing to graduate into an apartment and they are going to have

rules and regulations. It is OK to have friends over every now and then, but you can't house your buddies for the next month.

Comment 32: That is a talk that I have with my clients and to be involved with the program you have to sign a participation agreement. That is one of the lines in the participation agreement that you cannot have anyone that is not on the lease staying with you. I get calls from the landlord saying that they are having a lot of activity and they are having a lot of people with backpacks. I have landlords that will work with me. I have clients that will stop for a little bit and then it will start back up. It will stop for a little bit, but it will start back up.

Comment 33: So those landlords who will work with you, you are more inclined to put more tenants there.

Comment 34: So that is where we end up with the concentration.

Comment 35: I do not tell when some of the clients when I meet with them, what apartments do you want. I can't steer them, but I will give them a list of some of the properties that we already work with.

Comment 36: They talk to each other too. They may need assistance and help, but a lot of the times they know more than we do.

Comment 37: They find apartments that I haven't worked with yet.

Comment 38: They help each other. Our homeless clinic has extensive training that they go to before and then they place people in Shelter Care. It is extreme. It is extensive. They have a graduation. A whole bunch of them get transferred to our clinic. They are a different population. That is who they are and what they are and I do not know that conventional housing with rules and regulations is going to meet that expectation, a lot of them. That is why they are homeless. We keep thinking that it is not just a matter of resources either. It is a matter of that they are not going to change. It is a life style that they have chosen. I do not know what you do with that.

Comment 39: We not only have that problem with the homeless population too, but we also have that problem with housing residents also. Sadly a single mom with two kids who gets a voucher and moves in and within 30 days her two boyfriends are living with her and there is not a real good mechanism for Fort Worth Housing, Tarrant Housing, or Arlington Housing to come out and check that even if there are complaints. Sadly that is what happens. We have a real heart to help that single mom with two kids, but when they move in their no good boyfriend, who is selling crack out on the street and now he has a place to lay his head and that is a problem. You guys know that that goes on.

Comment 40: That is a problem with our case manager. They go to the property monthly.

Comment 41: That is great.

Rob Gaudin: For those people that are successful that you place. There must be some margin that can move to the next step. At least all of us hope that to happen, but for them to find a place the people in front of them must also find a place.

(Presentation)

Comment 42: Have you included public transportation in your focus groups?

Rob Gaudin: One of the questions on the survey asked if there are some services that are limited. You can't access the barrier to access. The one such as transportation and employment

center with transportation it takes two hours to get there. It was unbelievable the number of times that people talked about transportation. It is always talked about, but for here it was really often.

Comment 43: It is always like that. Even in the homeless surveys that will be one of the top barriers. They do surveys for case managers and surveys for clients.

Comment 44: I asked my clients and my staff to give me barriers and that was and I think I agree with you. That was across the board. I think that The T (Fort Worth Transportation Authority) just needs to know where these issues are. Maybe who ever designs their routes?

Comment 45: Then they cut routes and bus passes go up. Monthly bus passes are \$60 now, so I purchase those for clients and I have clients with disabilities and I get those for \$30, but I am still spending a lot monthly on bus passes for clients.

Comment 46: There are two issues then. Make that the T provides public transportation and put stops or routes in those areas. So if affordable housing is made available in those areas close to the jobs. If we try to provide housing to lower income families and that is why the Housing Authority is happy about a property that we are about to open very soon that is close to the Medical District. They are lots of people who work in those areas, low wage people. We will target this property to them and they will be able to get to work. So making sure that there is affordable housing in the areas where the jobs are, but in the other area as making sure there is public transportation. I think including The T would be good.

Comment 47: Transportation has always been a huge issue with AOC (AIDS Outreach Center). I would give a list to a client that I am trying to put on our housing program and it would be a 3 page list of affordable housing options in Fort Worth and it would come back to me a couple of days later with slashes through the apartments that didn't have a bus stop nearby. All of those were pretty much outside where we are talking about where the Hispanics are located, the black population is located. They would not go anywhere where white was indicated on there because that is where the bus stops wouldn't go. They needed those bus stops right there next to their house.

Comment 48: They stop at a certain time too.

Comment 49: They stop early.

Comment 50: Later at night that is the issue. If you find a job that wants you to work late then that is an issue.

Comment 51: We have had issues with people who do get housing somewhere further out and they might have the supports to maintain there, but then they can't get into the medical or health services they need. Then they have issues and problems.

Rob Gaudin: I recognize that your department cannot do anything about the transportation network other than voice to the city's government that there are issues for their clientele. Never the less, if we move ahead in time and what this study requires is opening access to areas of opportunity. Those areas of opportunity really are these industrial growth areas. That is where opportunity is being created. So, how do you get there? You can't afford to live there, but how do you get there. We want to be able to provide people with an opportunity to advance and move ahead in their lives and transportation is one of many ways and not just educational things, although that is very important too.

(Presentation)

Comment 52: As far as barriers go for rental. I guess class points are a barrier. The other barrier I think is a society issues in that some of these people do not know how to live in a rental unit. They have other people beside them. I know that I had one that actually came from MHMR and I eventually had to get him out. He was a hoarder. His apartment was so filthy you could hardly walk into it. So those type of things and people who live next to that do not want to live next to that, even though some of them are in the fair housing program. Also, most of the people that I have are very good. If you line them all up you probably couldn't tell me the difference between a market unit and a fair housing unit. Those are some of the things that I see. I am even an owner of some rental house. I don't ever do it and it is hard enough to find people who take care of properties. Sometimes I have people that move in when I think they are good, then they leave and I have to go in and completely redo the inside of the house. That doubles when you talk about some people that is under assistance. Why is that? I do not know the answer to that. It is more of a society issue as a whole, but I think that is one reason why you find people that are resistant to people in the fair housing market. Those people tend to stay in a place for a couple of years and then move. They are not there long term and they know that so they the property as such because they know that they are not going to be there for a long time.

Comment 53: One of the things that I know at least with MH people, the reason that a lot of them can't keep housing, they may get it. Like you said that they are not able to maintain it and to keep a place clean. I have begged for people for what can we help to do with housing and it is not necessarily more housing, but if we can provide a cleaning service for people with disabilities, including mental health. They can't do it themselves. If somebody could come in once a week or every two weeks and do it for them then they might be able to maintain their place, but that is not a resource that anyone has come up with yet.

Comment 54: There is no federal money to pay for that. It is not that much in addition to what you are spending and I think it would really make a difference in keeping more people housed. As much as you work with these people and try they just do not get it.

Comment 55: Also, with people who don't have mental illnesses, my clients I have to send violations for keeping things clean. The apartment manager has to threaten to evict them. It is not just about keeping it clean, you have kids and you just can't pick stuff off the street. There are bedbugs and all kinds of issues that can affect your health. It just doesn't go for people with mental illnesses. It could just be anybody. It could even be people who do not need public assistance. It is just the individual and individual cases.

Comment 56: Also mentioned most of my clients that I have under fair housing some of them do work, but I bet the biggest majority of them are on some type of disability or they are getting some type of substance from the government. Most of them do not even work. They do not go to a job at all. It is blowing my mind and I am new at this. It blew my mind a little bit that there are so many people on so much assistance from the government that they do not have to work.

Rob Gaudin: There are life skills issues and training people and trying to help them to gain that knowledge. What about the providers? The people, the landlords do you see any difficulties with the entire family? Other providers of rental property do they have certain practices that might be questionable?

Comment 57: I just went through the list that my staff gave me and one of them was manipulative owners and managers. They see in some cases people taking advantage of a population because they do not know any better. We see that. That is a minority and I do find that. They have owners and managers that intimidate with tenants not knowing their rights,

lack of proper education for the tenants, the mental health, and of course the lack of transportation, and the lack of no one to assist. We have a lot of people who do not have a support system and no family so they do not know what to do. That is a list from my staff, but from the owner's perspective, the property managers and owners. I think it is a combination of they work to assist and keep people there and the others who are manipulative.

Comment 58: They just want the money.

Comment 59: I have landlords all the time that will find out that our clients are trying to rent from them and they will call me up and say what is the most the rent can be. Not here is the amount that this property is rentable at, but how much can their rent be. That is what they will base the lease on. I refuse to answer that question. I ask them to tell me how much you were renting it before my client decided to ask about it. They want to know since we have those fair market rates, they want to know what is the most that it can be rented out. It happens all the time.

Rob Gaudin: Do you see this providers steering people to certain areas or saying no to one person and yes to another person.

Comment 60: I get a that lot if they are going to receive housing and if it is as much is, how much can the rent be it is or we do not accept housing. It is either that or the other. I do not see them telling them no, but this property over here provides housing. It is just you are on housing, no. I get that a lot even if they don't...they will not let me negotiate or talk to them about what my program is. It is just no. Fair housing, I do not want to do it. They do want to be under contract and we don't even have a contract, but they still think that is this is contract deal that they have to sign off on and they won't even hear what I have to say.

Comment 61: Are these multi-family or single family project owners?

Comment 62: It is both.

Comment 63: As an owner you do not have to take Section 8 or MHMR. That is one of the few choices that as Americans we have these days. The biggest barrier we have and I will just be real honest, that we have participated in all of these programs, Shelter Plus and we do not shy away when somebody brings us a voucher or MHMR or calls us or something. The biggest barrier for us is in our head and it is created from our experience over all the years with some of these clients. So sometimes we act a little hesitant, OK especially with Shelter Plus people. We get a little hesitant with those because our experience for the most part, the majority of our experiences have been really really bad.

Comment 64: So, it is the stigma attached to the vouchers.

Comment 65: That is what I have run into is the stigma.

Comment 66: We are the ones that work with them and help them to get into that place. They are very challenging. I understand.

Comment 67: I am so sour at blaming PNS as well is everybody else because the way we have been treated over the last year and the last three. They have worked real hard to get those people out after they have caused me problems. I am not sure that I want to go through that again. This is three for three on this issue. When have tried to help these people out and have bend over backwards. What happens is and especially in a multi-family situation, they start disturbing the neighbors around there. So I may loose two or three good residents before I can get this one out.

Comment 68: It is a big problem. These are people with mental illness.

Comment 69: Some of them. The PNS shelter people weren't necessarily.

Comment 70: The PNS, I have issue with my clients and some of them do not have mental problems.

Comment 71: We have some of those that get into our system and fake the mental illness. They are doing it to get housing, but now that new people cannot get into Shelter Plus Care, then those people are not coming anymore. We love Shelter Plus Care, but we also hate it. We have a brand new person and this first time they are there that is the first question out of their mouth.

Comment 72: I am so glad this is helping me.

Comment 73: You are the responsible agency with Shelter Plus and they are trying to get through you to get what they want.

Comment 74: They are trying to get housing and not mental health services.

Comment 75: Somebody told them that you offer housing, so they went there.

Comment 76: Can I ask this question and this goes to us getting to something that we can put in our document. Is there as difference in success rates based on the extent of case management? You were talking about this particular client profile from your experience. Our case management standards are not enough home visits? Would that make any difference or not? I am just wondering.

Comment 77: Every program doesn't come with a case manager.

Comment 78: That is kind of my question.

Comment 79: I know what we do is a lot more intensive than the other programs.

Comment 80: I think it depends on the program. If you have MHMR that spends a lot of time with their clients whether it is in the office or out in their homes or if you go to the Community Enrichment Center program where they have extensive case management, they are in home a couple of times a month. Their mission statement is to take homeless people out of the eviction process or out of the shelters and house them or you go down to a Housing Authority that they apply until they come out and do the next home inspection.

Comment 81: I think the answer to your question is yes. Just in the regular, Shelter Plus Care they have to have case management. We do not provide it, but the sponsoring agency does. So with a regular voucher participant they do not have a regular case manager. If we have a voucher participate that violates the lease or does something, we do terminate their assistance. Then that person is going to end up without housing. So I think to answer your question if there is case management involved they are more likely to be successful and I think we could take it further with the extent of that case management makes a difference. They just recently told me that we have to remove people from Shelter Plus Care because of some funding issues. MHMR is moving them over to the voucher program. MHMR made a commitment to us that they would still provide the case management to them, because without the case management they are going to lose their housing.

Comment 82: But so many case managers are limited and overworked. So you have to look at that. How is a case manager with a case load of 30 that you have to see once a month, but you have some that you have to see more than once a month.

Comment 83: I think that the case managers need to be more involved with the landlords as well. I will have situations as well where there was an initial problem, but I will not get a phone call for two months until the landlord has totally had it and the client is about to be put out. I don't hear about it until right then. If there was a relationship between the client and the case manager and the landlord and the case manager to where problems could be nipped in the butt right off the bat instead of when the client is getting ready to be kicked out. That would be help a lot as well.

Comment 84: You have some landlords and I go in and I talk to them and give them my card and say any problems or any lease violation email to me. They do not call me and sometimes they do not even want to talk to me. The lease is with the client and not you, but I am paying a portion of his rent. So I need to know what is going on.

Comment 85: So more education for the landlords.

Comment 86: It is different. There are all kinds of variance to it.

Rob Gaudin: To what extent are any of you exposed to market-rate providers?

Comment 87: Market-rate. I mean from the places that my client pick, the market rates that we pay are OK.

Comment 88: I know that I have had a couple of people from Fort Worth Housing and I am on the list. So, I have a lot of people call me and they ask me what my rent is. We are a 60/40 tax credit property. I do not know if everyone knows what that is. They have to qualify and they have to make certain, they have to make less than a certain amount of money each year and with that then the state can tell us what we can charge for rent.

Comment 89: For the 40 percent units and 60 percent are market-rate. Is that correct?

Comment 90: Actually out of my units I have 106 units and 62 are income restricted.

Comment 91: Sixty two are income restricted and the others are not. Forty of them are market-rate units.

Comment 92: Forty are market-rate and basically that was how the building was converted to apartments. It is a 30 year program and we are past the compliance period so we are on the downside of it. Even when I have clients call me and I tell them what the rents are and I am downtown Fort Worth, because the maximum we can charge for a one bedroom is \$700 according to the state. I tell them \$700 and a lot of them hang up because they are looking for something like \$300 or \$400.

Comment 93: On a program like mine a one bedroom is \$714, but that is including rent and utilities. If I take into consideration that that one bedroom might have \$60 in utilities and you are charging \$700, it is going to be more for me to be able to pay for.

Comment 94: What you are going to find on these agreements is that a lot of these properties are half market and half affordable housing. So when people call us we ask them where they want to live. Well, I want to live in Euless. Fine well we have three properties in Euless and two of them are affordable housing properties that have two sets or rents on them and another one is not and they do not take any housing and all the one bedrooms are over \$700. What we do is quote market rents and say by the way this property is an affordable housing property. Based on your family size if your income is below this level then your rent could be this on this unit instead of \$600 it could be \$450. I know that he has to do that too. He may be quoting market rents, but he may be adjusting those for qualified people. The property does not have to

be qualified. So you are working both sides of that fence. You can have X amount of market rents, but you must have X amount that is occupied by what the feds call very low or low income people that is dictated by family size and incomes for that area. That changes in Fort Worth. That may be one number in Arlington, but one number in Fort Worth and a different number in north Fort Worth and the rents and the incomes will change in those different market areas. Around here there may be separate.

Rob Gaudin: So backing up to your statement about some of the properties that came into the affordable housing market due to the Savings & Loan debacle that is nearly 30 years ago now and the properties are probably at risk. How many of those units do you think are at risk in Fort Worth?

Comment 95: I bet there are probably 40 or 50 multifamily properties that were sold that way.

Rob Gaudin: How many units?

Comment 96: Maybe 10,000. The majority of those properties are probably concentrated over in the Woodhaven area in the eastside of Fort Worth in that neighborhood. That is where a lot of the low-income people live. Woodhaven is a case study in and of itself.

Comment 97: I do a special report just in that area.

Comment 98: I do not like that area. I tell the client if that is where you want to go then it is on you.

Comment 99: You are right. Some of these are coming up on their 30 year. Some of the agreements are longer. They may be 50 years or longer. They may be always as long as multifamily has to be low income provider. It depends on the way the feds sold them back then, but the majority of them are 30 year agreements.

Comment 100: Ideally I would not want my clients in those apartments. There is crime and it gets them involved in other things.

Rob Gaudin: Let me ask another one of these questions about the physicality, about the construction and the accessibility of the multi-family units. Do you see problems with that? Maybe new construction does not having proper ADA?

Comment 101: I haven't run into accessibility problems too much. I haven't received complaints that properties are not providing accessibility. Every case that I have known about if a client has needed that kind of access then they have been able to get it.

Rob Gaudin: For your facility?

Comment 102: Not just for us, of course ours are all accessible.

Comment 103: Any new property under construction has to have certain number per 100 units. They are being built out there.

Comment 104: Even the older properties the property managers are able to find units in their building if someone needs accessibility. I just haven't seen that as a big problem.

Comment 105: We have had a number of it is something that has happened after they have been somewhere and the property managers have been pretty good about accommodating them and letting them move to another unit or even get out of their lease if they have to go to another location.

Comment 106: My problem is having them sit there vacant. I have two units and I have one that has been sitting there vacant a year that is wheelchair accessible. It is sitting there vacant and I can't lease it unless I get a qualified person for it. I am constructing another one right now and who knows how long that two bedroom will sit there. I am having a problem finding people. So I have a \$650 a month two bedroom unit sitting there waiting for somebody that is qualified. It is just sitting there vacant. I can't lease it to anybody, but a qualified person.

Comment 107: Just recently the Housing Authority turned down a grant from the state to provide money for us in the private sector to make units accessible, but after we surveyed our clients' needs and what was out there already. We were also looking at the administrative burden of administering the grant. We decided not to do it. So I don't see a big problem with that. I hate to go on record saying that, but with my personal experience and complaints that I have received from the constituents we serve.

Comment 108: When you did the survey, can I get a copy of that?

Comment 109: It was not a formal survey. It was just based on talking to the inspectors and they are the ones out there doing this. They did not see a need for more accessible units, but also the property owners did not want to apply for the funds and to make to modifications to their properties, plus the administering burden that the state was going to put on us to do it.

Comment 110: I agree working with the state...

Comment 111: My question is when you talk about accessibility are you saying all over Tarrant County? It is an issue of course our clients said in certain properties not on the bus line. Are you talking about that accessibility of the landlords letting them in?

Comment 112: You are talking about accessibility for people with disabilities right?

Rob Gaudin: Correct.

Comment 113: Like you said those new properties are required to have a certain number of units.

Rob Gaudin: The way these questions are set up for those who took the survey is if you said yes then there is a blank to fill in. This always comes up about the number of units that are being constructed without ADA. Typically what you find is that there is some audit test on newly constructed and what you find is there is a lot of liability, long term liability. You are all providers, so I just find that interesting. People are responding to the survey complaining about that, but you don't see a problem. Let's look at the public sector. Again, questionable practices are there practices that might be barriers?

Comment 114: Of course that neighborhood and the community development policies. The officials listen to their constituents that are opposed to certain types of property development that are particularly for the homeless. We have experienced at the Housing Authority and we have tried to develop and do something and the city did not do what they needed to do to get it done. We are working on something else now and we have not been able to get the community support. I just think getting the elected officials to support something if we need the council's approval for that would be difficult.

Comment 115: There are a couple of particular projects that the city was trying help the Housing Authority do and it will probably be mentioned in the lunch group. We have a development group meeting.

Comment 116: So that is an issue. I do not know if it is a policy problem per se, but when you need the council or that support. I do not know if it is a zoning issue or whatever.

Comment 117: It is a standard NIMBYism issue. Usually we run into and just as a background for the group, the city has a policy position to support affordable housing and permanent supportive housing and we work very actively with the Housing Authority with our federal funds to partner in projects, but there have been particular instances where we have tried to partner in a project and there was such a neighborhood outcry. The council member in that particular district was not comfortable going against the neighborhood outcry of the homeowners and the neighborhood associations and part of that goes to that some of these projects are tax credit projects and tax credit projects require neighborhood endorsement. So you have a couple of things going. As I said I have a couple of people coming to the lunch group that will talk about and get at the more specifics. It has happened to non-profit developers and it has happened to the Housing Authority, which was working with the city on a couple of projects. The Villages in Carlton are the ones that I am aware of.

Rob Gaudin: Let me ask you more specifically about zoning. Are there particular zoning practices, policies, or codes that you find problematic for your industry, particularly for the provision for affordable housing?

Comment 118: The only thing I can say is I had one lady come to me and she was going through Tarrant County Housing and we are not approved with Tarrant County Housing Authority, but we are with Fort Worth. I worked with her and to get her approved and the process was ridiculous for one person. So we never did go ahead and get approved with Tarrant County because of the process.

Comment 119: I guess we will be considered public sector the Housing Authority.

Comment 120: We were approved through you, but we were not with Tarrant County. I had a client come and really wanted to be in that apartment and I would have approved her, but just to try to get approved through Tarrant County Housing Authority was a process that we finally said it wasn't worth it to try to do it.

Comment 121: I think that that is a legitimate point. Even with all you just said about Fort Worth that maybe Housing Authorities should look at their policies and procedures, our procedures for approving new properties.

Comment 122: Isn't some of it HUD mandated?

Comment 123: A lot of our mandates are that we do an inspection and check to make sure that the property owner is not on the barred list. The other things are just procedure that we put in place.

Comment 124: We had to attend whole day session.

Comment 125: We require you to attend a session. It is not a day. It is like two hours.

Comment 126: Tarrant County we had like a whole day deal. It was more than it was worth it.

Rob Gaudin: Was there a particular barrier or just a long stretch of hoops.

Comment 127: It was just having to jump all these hoops to get one person in.

Rob Gaudin: It wasn't the intent to not?

Comment 128: I would have loved to have helped her. In fact to I tried to get her to come through you guys.

Comment 129: She had a voucher from Tarrant County so she couldn't do that.

Comment 130: They have a time frame to where they have to find a place.

Comment 131: She was with another property and she wanted to move downtown.

Rob Gaudin: One of the other things that we did was to request Housing Complaint statics from the Human Relations Commission and from HUD. HUD's letter was I am sorry. We didn't get your letter, we lost it. You should have sent it to somebody else, but they are in the process on providing the data.

Comment 132: I do not think that you should just go by complaints. You should go by the outcome. You are going to find lots of complaints based on those categories, because I get them, but most of them end up not being filed. So I don't think you can go by. If you go be the number of complaints you get that shows that that tenant that is what they thought was the issue, but if you look at the outcome, they are not founded. So maybe you could extend it to show complaints verses the outcome.

Rob Gaudin: In each case we ask for the outcome. This shows the complaints. In every case that I have done this about half the complaints are valid. They are judged with cause by the distributing of issues on the basis of protective classes remains unchanged. So, about half and sometimes it is a little more with cause and sometimes with less.

(Presentation)

Comment 133: What I hear about is that people say they didn't get certain services because of a certain criteria. In most cases it is because of a disability. I do not see the complaints where they are able to site somebody else who did get it, but they are saying why they didn't get that service and why they are discriminated against. So I do see that and it is almost always because of a disability and race.

Rob Gaudin: Race meaning I do not want you here. I want somebody of a different color?

Comment 134: What I hear people say is that this happened to me. Not necessarily they didn't get then to rent, but whatever happened to them was because of their race. It is usually because they were African American or of their disability. I don't really see the ones that we get that they are going to say that they didn't get to rent this property there, but if they think they were treated badly because of some other service it is based on that.

Rob Gaudin: Some other service, not related to...

Comment 135: Sometimes I have seen the rent or being forced to move or if a landlord said they violated some type of tenant or violated the lease. We will get those kind of complaints if it was based on their race other disability.

Rob Gaudin: When in fact they violated the lease?

Comment 136: When almost everything that I have investigated that is what I have found to be the case.

Comment 137: I have seen that a lot too. I just think that when they are about to lose their housing they will do anything that they can and use whatever they have whether it is race or disability because they have children. They are going to use whatever they have to hold onto it.

Comment 138: I have seen based on disability. I had to go to court and testify for one of my clients.

Comment 139: I think disability. You know what I suspect and this is just my suspicion, but I think it is correct. I think the person with the City and HUD and anyone else that helps people to file their complaint and if the person thinks that they are being treated unfairly. Whatever category that tenant falls into that is what they use as a basis for their complaint.

Comment 140: They fit something.

Comment 141: They help them to fit something. Let's say you are African American and let's say you were discriminated because of that or you have a disability or whatever. I can't give you any empirical evidence to support that, but just from my conversation with people who have happened to have filed these complaints and not just here. I have worked in another large city and another large Housing Authority and I saw the same thing happen. I think that is just what happens.

Rob Gaudin: There are complaints that are without cause. There is no doubt about it, but those that are with cause. My position is that you will find about half of those to be with cause. Where does that occur most often? This is not in public sector or Housing Authority; it is in the private market whether they are trying to lease lower income, more affordable units. Have you heard stories?

Comment 142: Yes.

Rob Gaudin: That is what I am after here. What do people also face outside of the services that you provide?

Comment 143: Let me just tell you because we get calls, because people do not know who we are and what we do. So I might get calls and emails from people who are complaining about being treated unfairly in the private rental market and they think that they can complain to us. So we do see that. Again it is not because of unreasonable accommodation, but usually people feel that they can't rent a place because of a disability. I see those inquires coming into us. Usually people are not receiving any assistance from us, but that they think that we can help.

Rob Gaudin: What do you do for them?

Comment 144: Nothing. I just refer them to the right commission.

Comment 145: I think that I see clients who are on assistance. Just all the phone calls that I have to make and coming into the office for them to fix stuff for my clients who are on assistance. If they have a maintenance issue, I have found that some of the apartment managements take forever to come in and fix stuff. You would think that they would do it quicker because Tarrant County is paying the rent. There is always an excuse and then I have to go into the tenant rights and have the clients send a certified letter demanding that they fix this. Then I have to go into that and then they will fix it, but why do I have to go into that to get them to fix it.

Rob Gaudin: Have you noticed this for certain groups, but they fix it for others?

Comment 146: I do not know that, but I just see what happens with my clients. How do we know that? It might be happening, but how do we find out?

Comment 147: I think low income or people that are receiving assistance are probably discriminated against as opposed to not and maybe even in the same apartment complex.

Comment 148: I have my clients tell me that she will want me to go into the office because they will make her feel real little because we are paying the rent. When she might have a leak or something I will have to go in there and talk to them about it even though she already put it

in. So I hear from my clients if I would go and put a request in and get a copy of that request so I can have a copy of it, because then it is just your word against. She didn't come in and put in in and different things like that.

Comment 149: So you are saying there is a difference for people who are receiving assistance and those that are not.

Comment 150: I mean I feel that way, but I can't prove it. Unless I know somebody that is staying in the apartment that is not on assistance, but I don't know anybody to know if they are fixing your things verses fixing my client who is receiving assistance, but that is how I feel.

Rob Gaudin: So would the solution to that be protection from source of income?

Comment 151: I do not know why. At the end of the day if the client is paying or not you are still getting your money. So you should come in and fix whatever needs to be. Then I find when they know we are doing an annual inspection they are rushing to fix something.

Rob Gaudin: I hear that you are saying there is discrimination based on source of income.

Comment 152: That is what it sounds like. I wouldn't be surprised at that.

Comment 153: It is not that you can identify.

Comment 154: Is it based on your own experience when you were a tenant and you called and they fixed it?

Comment 155: Yes.

Comment 156: You have to have something to base it on.

Comment 157: I think you need to be real careful about that perception, because you are only seeing it from your client's standpoint. If you have a property that has 250 units and it has three MHRP people and a couple of Section 8 people there. They have a lot of tenants and residents to deal with.

Comment 158: But three weeks or four weeks for a leaky faucet that is ridiculous. You keep saying for two weeks that you are ordering the part. How long does it take to get it in? I am reasonable and I know that it takes time to answer a request and get things done, but when it has been over a month that is ridiculous to me.

Comment 159: We manage a lot of units that are low income and regular. We have them scattered and mixed everywhere for a lot of different owners and when service requests come in we don't look at some sheet to see if that person is on housing and this person is not. That never happens, but we try to prioritize service requests by the nature of the emergency. You are exactly right. Three weeks is too long to fix a leak, but you have to prioritize things. Your air conditioners are the most important thing, because we do not want then calling code compliance because we did not fix their air conditioner. A leaky faucet can wait.

Comment 160: It is leaking to the point where their tub was filling up and she couldn't bathe her kid. It was filling up and overflowing and there was only one bathroom. I know you know that some stuff may take time and some stuff cannot be done in a couple of days. I am reasonable, but then I am calling and trying to talk to the manager. Oh she is in a meeting. She is in an interview. OK, I will leave a message, but they never call me back so I have to show up at the property.

Comment 161: You might also encourage your residents, because Fort Worth has a policy with code compliance. If you are owning or operating a multi-family property in Fort Worth you

have to have a sign up that says if you have code violations here that are unresolved. It says unresolved code violations, like a bathtub stopped up or a toilet overflowing to call this number. Believe me code compliance will be out there the next morning and all over that landlord or owner. So, sometimes just encourage your clients that if they have something that they notified the office about that is unresolved and not fixed then they can call code compliance.

Comment 162: Landlords hate it when you say code compliance to them.

Comment 163: Owners absolutely do hate that. The last people in the world that I want to see on any of the properties are code compliance. Anyway work that angle also.

Comment 164: If you think that you have a relationship with the landlord you would be, but at the end of the day they are about checks.

Comment 165: We have a lot of slumlords in Fort Worth, but the majority of them are good owners and good landlords and they don't intentionally, to my knowledge, try to discriminate against people.

Comment 166: When I have I issues like that I don't put that property on my...

Comment 167: Maybe they don't fix the bathtub on the other 200 units too.

Rob Gaudin: It is interesting that you say that about code compliance. The respondents to the survey are really quite critical about code compliance inspection. That they are selectively enforced and in some areas they are not enforced at all. They completely ignored other areas.

Comment 168: I get complaints from the property owners in Woodhaven, because that is a highly visible area. They are getting stricter with the code compliance inspections. They are more critically than other areas. That is because we have complaints about that area and code compliance is right on them.

Comment 169: Code compliance comes every two years to inspect your property. If you make a passing grade they leave you alone unless a residence calls them and there is a complaint filed and then they are out the next day. So, if you are a good landlord and you are passing your code compliance when they come out every two years and you are paying your fees and everything is in order then they go away and leave you alone unless they get a call from a resident. If it is a resident they usually do not have to leave their name. They can call anonymously and it is mandated in the city ordinance that you have to put a sign up on the building telling them where to call.

Rob Gaudin: What is the threshold? We were talking before about someone that has moved to another house and they want to rent their house. Would that house be subject to code compliance?

Comment 170: No.

Rob Gaudin: What is the threshold?

Comment 171: A four-plex and up you have to register with the city. If you just have a duplex then you don't have to tell the city that you are the landlord of a duplex.

Rob Gaudin: So maybe that is where some of these complaints that are in the survey are coming from duplexes and triplexes. They would not respond at all. Is that correct?

Comment 172: Not respond to what?

Rob Gaudin: Not respond to units smaller than a four-plex.

Comment 173: They would if somebody called and complained like if the grass is too high. They were supposed to respond to single family houses. If you call that your neighbor hasn't cut his yard in three weeks and it looks terrible you can call code compliance and they will go out and write him a ticket or if he has a big hole in his roof and you call anonymously they will go out and write him a ticket for having a substandard even on a single family house. Code is involved in everything.

Comment 174: I think that the tenant in a single family rental can call code about similar substandard issues.

Comment 175: A violation.

Comment 176: What he is talking about is the city's regulation to biannually register and inspect.

Comment 177: From a four-plex up.

Comment 178: Single family rentals are not automatically inspected.

Rob Gaudin: Imagine if the policy stated procedures matched what people are saying in the survey.

Comment 179: By the way the city also has an employee handbook. It is a tenant's rights handbook and when we lease a unit in the city of Fort Worth we have to give that person we just leased to that. Whether they were AIDS client or a MHMR client, they get that piece of paper that says here is what your rights are and if any of these are violated here is a phone number to call.

Comment 180: And they don't read it.

Comment 181: They call us and say what do I do now?

Comment 182: All we are responsible for is making sure that they get it. It is not even a pamphlet with us. We have narrowed it down to an 8 ½ by 11 piece of paper where we copy part of the pamphlet on one side and part of the pamphlet on the other. So we hand them one sheet of paper. Here are your rights as a tenant. So that helps because they have those numbers on there.

Rob Gaudin: I just wanted ask and a review of the first couple of slides had the city kind of segregated and what you came back with was it was based on price. Is that really the case?

Comment 183: Based on price and based on tenant preference on where they live.

Rob Gaudin: So it is in a way self-selective.

Comment 184: We give our clients a three page front and back pamphlet of affordable housing in Fort Worth and they choose where they want to go. It is their choice.

Rob Gaudin: With the limits to the transit.

Comment 185: Yes.

Comment 186: Also, just what the rents are and what they can afford. So I think it is both. When I first moved to this area a few years ago I could have probably afforded to live where I wanted to live, not anywhere, but many places. I tended to go where the rest and I came here from New Orleans after Hurricane Katrina and I tended to go where the rest of the people I

know where moving to. I think it is just natural for people to go where there are other people they know are going.

Rob Gaudin: What about public policy? Some places where we have worked adversely affecting development of affordable. I do hear you saying there are difficulties with political will. Are there other things besides political will and NIMBYism?

Comment 187: Sure there are. There are all kinds of things. There are tax incentives. That whole North Fort Worth area out by the airport is just an enterprise zone. So there are a lot of tax exemptions in that area and so the business growth and the retail and the commercial growth and the residential will follow that. Yes there are all kinds of public policies that affect this. If Fort Worth T decides not to run bus service to North Fort Worth then there is not going to be a lot of affordable housing put out there or down to the Hulen Mall area or wherever. There are all kinds of public stuff.

Comment 188: I also think the building relationships with landlords and apartment managers in the other areas is also an issue. We do not target and reach out and educate them on our programs then they do not know about us or they might not be willing to work with us if they do not know that. If you can't get your clients out there what is the point in trying to get in contact with them if the clients can't get there.

Rob Gaudin: So regarding to tax policies or public policies we see the adverse effect, how might we go about changing that and do we wish to? Are you satisfied with the way things are?

Comment 189: I think a lot of public policy is guided by their constituents, the tax payers. I think educating them, the regular citizens in the communities about that. I think education of the public might affect the policies that are established. I think most of the decisions that are made particularly by the elected officials are going to be based on what they think their constituents want. I think we need to educate them.

Comment 190: I don't necessarily disagree, but I think that most public policy is driven by economic growth on what the city can have and job creation. I think that is what the city fathers really want. What businesses can we bring here and where do they want to go? If we need to offer a tax exempt status to Ross Perot Jr., who we all know does not need a tax exempt status to build an airport out here. So, that we can have all of this growth like a UPS, a Sears, A JC Penny, American Airlines maintenance facilities, which brings thousands of jobs to the area thus creating the commercial and the retail and the housing all round it. Well that is what they do because over the long term that is what benefits the city. I think most of that public policy is directed toward that towards the economic growth. I am sure that is Ross Perot Jr. wanted to build an Alliance Airport right in the middle of Southeast Fort Worth and the land had been available there, then that area would have exploded like North Fort Worth did. I think it is just the city makes those decisions based on economic development and job creation and how can that tax base help the city.

Rob Gaudin: My question then is to what extent can we open access to those jobs for those that live in lower income areas?

Comment 191: Get some transportation out there.

Comment 192: I think that transportation out there is a big issue.

Comment 193: Then you have those areas where they do not want public transportation and it is because they do not want certain people living in their neighborhoods.

Comment 194: Those types of things simply follow later as the demand increases. Maybe the demand is not there right now, but maybe as the demand increases then the T will explore new ways to put in a rail or a bus service. They can't just start it and have three people riding it and lose money all the time. They have to go where the demand is.