

# **2017 CITY OF LEWISVILLE ASSESSMENT OF FAIR HOUSING**



**FINAL REPORT**  
**JUNE 22, 2017**



# 2017 CITY OF LEWISVILLE

## ASSESSMENT OF FAIR HOUSING:



Prepared for the:  
City of Lewisville

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**Final Report**  
**June 22, 2017**

# **HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?**

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

**North Texas Fair Housing Center**  
8625 King George Dr, Suite 130  
Dallas, TX 75235  
877-471-1022

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- 1. Submission date:
- 2. Submitter name: **City of Lewisville, Texas**
- 3. Type of submission (e.g., single program participant, joint submission): **Single Program Participant**
- 4. Type of program participant(s) (e.g., consolidated plan participant, PHA): **Consolidated Plan Participant**
- 5. For PHAs, Jurisdiction in which the program participant is located:
- 6. Submitter members (if applicable):
- 7. Sole or lead submitter contact information:
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  - e. City: **Lewisville**
  - f. State: **Texas**
  - g. Zip code: **75029**
- 8. Period covered by this assessment: **2017-18 through 2021-22**
- 9. Initial, amended, or renewal AFH: **Initial**
- 10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
- 11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

\_\_\_\_\_  
(Signature) (date)

\_\_\_\_\_  
(Signature) (date)

\_\_\_\_\_  
(Signature) (date)

Departmental acceptance or non-acceptance:

\_\_\_\_\_  
(Signature) (date)



# TABLE OF CONTENTS

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<b>SECTION I. EXECUTIVE SUMMARY</b>	<b>1</b>
<b>SECTION II. COMMUNITY PARTICIPATION PROCESS</b>	<b>8</b>
A. Overview	8
B. The 2016 Fair Housing Survey	9
C. Public Input Meetings	11
D. The Final Public Review Process	13
<b>SECTION III. ASSESSMENT OF PAST GOALS AND ACTIONS</b>	<b>15</b>
A. Past Impediments and Actions	15
B. Additional Actions Conducted	19
C. Past and Current Goals	20
<b>SECTION IV. FAIR HOUSING ANALYSIS</b>	<b>21</b>
A. Demographic Summary	21
B. Segregation and Concentrations of Poverty	38
C. Disparities in Access to Opportunity	51
D. Disproportionate Housing Needs	83
E. Publicly Supported Housing Analysis	91
F. Disability and Access Analysis	95
G. Fair Housing Enforcement, Outreach Capacity, & Resources	103
<b>SECTION V. FAIR HOUSING GOALS AND PRIORITIES</b>	<b>106</b>
<b>SECTION VI. APPENDICES</b>	<b>111</b>
A. HMDA and Housing Complaint Data	111
B. Fair Housing Forum Presentation	120
C. Public Involvement Documentation	127



## **SECTION I. EXECUTIVE SUMMARY**

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### **OVERVIEW**

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 characteristics. 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 opportunity to access housing. In 1993, Texas passed its Fair Housing Act, covering the same protected classes as noted in Federal law.

### **ASSESSING 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)<sup>1</sup>, 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, 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 (AFFH).

The City of Lewisville, Department of Community Development, has committed to prepare, conduct, and submit to HUD their certification for AFFH, which is presented in this Assessment of Fair Housing.

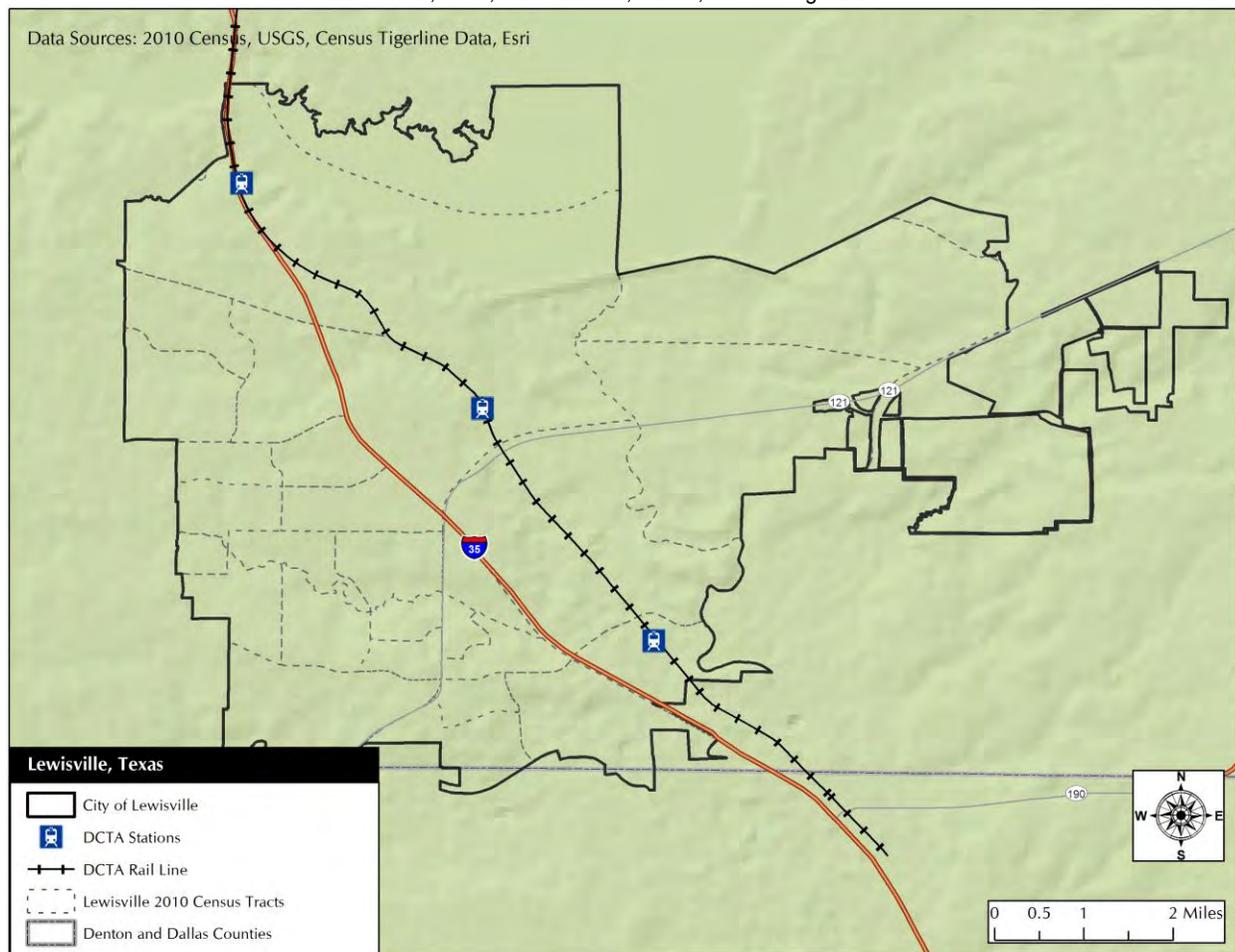
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<sup>1</sup> The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

The decision to approach the current study through a collaborative effort was motivated by a desire for efficiency and effectiveness, as well as recognizing a need for broad collaboration and coordination among members of the Fair Housing community on fair housing planning throughout the City. The geographic area addressed in this report is presented in Map 1.1, noted below.

### Map I.1 Lewisville, Texas

1990, 2000, 2010 Census, USGS, Census Tigerline



## PURPOSE AND PROCESS

The AFFH rule requires fair housing planning and describes the required elements of the fair housing planning process. The first step in the planning process is completing the fair housing analysis required in the AFH. The rule establishes specific requirements program participants must follow for developing and submitting an AFH and for incorporating and implementing that AFH into subsequent Consolidated Plans and Public Housing Agency (PHA) Plans. This process is intended help to connect housing and community development policy and investment planning with meaningful actions that affirmatively further fair housing.<sup>2</sup>

<sup>2</sup> <https://www.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf>

The introduction of the HUD's Assessment of Fair Housing tool (Assessment Tool) requires jurisdictions to submit their Fair Housing Assessments through an online User Interface. While this document is not that submittal, the Assessment Tool provides the organizational layout of this document.

## AFH METHODOLOGY

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

- Socio-economic and housing data from the U.S. Census Bureau, such as the 2010 Census and the 2010-2014 American Community Survey,
- 2008-2013 HUD CHAS data
- Employment data from the U.S. Bureau of Labor Statistics,
- Economic data from the U.S. Bureau of Economic Analysis,
- The 2016 HUD AFFH Database, which includes PHA data, disability information, and geographic distribution of topics
- Housing complaint data from HUD
- Home loan application data from the Home Mortgage Disclosure Act, and
- A variety of local data.

Qualitative research included evaluation of relevant existing fair housing research and fair housing legal cases. Additionally, this research included the evaluation of information gathered from many public input opportunities conducted in relation to this AFH, including the 2016 Fair Housing Survey, a series of fair housing forums, presentations, and the public review.

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, the City has identified a series of fair housing issues, and factors that contribute to the creation or persistence of those issues. The issues that the City has studied relate to segregation and integration of racial and ethnic minorities, disproportionate housing needs; publicly supported housing location and occupancy; disparities in access to opportunity; disability and access; and fair housing enforcement, outreach, capacity, and resources.

Table I.1 on the following page provides a list of the factors that have been identified as contributing to these fair housing issues, and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice
2. Medium: Factors that have a less direct impact on fair housing choice, or that the City has a comparatively limited capacity to address
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the City has little capacity to address.

**Table I.1**  
**Fair Housing Contributing Factors and Priorities**

Contributing Factor	Priority	Discussion
Availability of Affordable Units in a Range of Sizes	Medium	There is a need for additional publicly assisted housing throughout the City. Racial or ethnic minority households are more likely to be experiencing a disproportionate need due to cost burdens, incomplete plumbing or kitchen facilities, or overcrowding. This contributing factor has been assigned a medium level of priority based on the extent of the need and the City's ability to respond to this need.
Access to financial services	High	The ability of residents throughout the City to secure home purchase loans varies according to the race and ethnicity of the loan applicant. This was identified in data gathered under the Home Mortgage Disclosure Act (HMDA). The City has designated efforts to address this factor to be of "high" priority.
Resistance to affordable housing	Medium	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, contributes to a lack of affordable housing in the City. Lack of affordable housing restricts the fair housing choice of City residents. The City has assigned this factor a priority of "medium".
Discriminatory actions in the market place	Medium	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, serves to limit the fair housing choice of residents with disabilities and racial/ethnic minority groups. The City has assigned this factor a priority of "medium".
Lack of understanding of fair housing law	High	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, contributes to discrimination and differential treatment in the housing market. Furthermore, a lack of understanding of fair housing law means that those who may suffer discrimination in the housing market do not know where to turn when they do. The City has assigned this factor a priority of "high".
Access to publicly supported housing for persons with disabilities	Medium	There is limited availability of publicly supported housing in the City for persons with disabilities, especially with access to transportation. The City has assigned this factor a priority of "medium."
Lack of affordable, accessible housing for seniors	High	The lack of affordable housing continues to be an issue City-wide, coupled with a growing senior population, culminates in a growing need for senior access to affordable housing. The City rates this factor as a "high" priority."
Lending Discrimination	Medium	As demonstrated by HMDA data, there is the presence of lending discrimination in the community, especially for minority populations. This impacts these communities' ability to access a variety of housing options, and the City rates this factor as a "medium" priority.
Private Discrimination	Medium	As seen throughout the public input process, there are instances of private discrimination in the marketplace, limited access for some protected classes to housing options in the City. The City rates this factor as a "medium" priority
Siting Selection Policies	High	City siting selection policies and zoning may negatively impact the development of affordable housing in the City of Lewisville. The City has assigned this as a "high" priority.
Practice and decisions for publicly supported housing	Medium	In addition to siting selection policies, the practice and decisions for publicly supported housing may not promote publicly supported housing within the City. This may limit the amount of new publicly supported housing developments in the City, and the City has assigned this factor as a "medium" priority.
Lack of quality health care for some racial minorities	Medium	Public input indicated a need for access to healthcare for the Chin community in Lewisville. As the Chin population continues to grow, access to health care and other social services has been an on-going issue. The City rates this as a "medium" priority.

Ultimately, a concluding list of prospective fair housing issues were drawn from these sources and along with the fair housing contributing factors, a set of actions have been identified, milestones and resources are being suggested, and responsible parties have been identified. All of these have been summarized by selected fair housing goals. Each of these issues are presented in the table presented on the following pages.

The AFH development process will conclude with a thirty-day public review period of the draft AFH. Specific narratives and maps, along with the entirety of this report created in the AFFH Assessment Tool, will be submitted to HUD via the on-line portal on or before June 22, 2017.

## OVERVIEW OF FINDINGS

In addition to the table above, there are several significant findings or conclusions summarized here. Overall the City is pleased that this report finds low levels of segregation by race and ethnicity. The dissimilarity index explained in Section IV continues to be "low" for all racial and ethnic groups, although the City is aware that there is an increase over time in all the

indices and that the index for Hispanics particularly is higher and approaching the “moderate” level of segregation. Further, there are no Racial/Ethnic Concentrated Areas of Poverty in the City as defined by HUD.

Home mortgage data showed a high disparity between loan denials for potential Hispanic and non-Hispanic borrowers. There are also significant differences between black applicants versus white and Asian applicants with low and low/moderate incomes.

Fair housing complaints show that reasonable accommodations for disabled residents followed by racial discrimination are the leading issues, although the overall number of complaints are low with only 28 complaints in 8 ½ years.

There are large numbers of Lewisville households with “housing problems” as defined by HUD, especially with the problem of “cost burden” and “extreme cost burden” where families pay more than 30% or 50% respectively toward housing costs (a measure of housing affordability). A substantially higher number of Hispanic households and Native American households are cost burdened, followed by Black and Asian families.

### **GOALS, ISSUES AND PROPOSED ACHIEVEMENTS**

The following Table I.2 summarizes the fair housing goals, fair housing issues and contributing factors, as identified by the Assessment of Fair Housing. It includes metrics and milestones, and a timeframe for achievements as well as designating a responsible agency.

**Table I.2**  
**City of Lewisville Fair Housing Goals, Issues, and Proposed Achievements**

2017 – 2021 Assessment of Fair Housing

Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
<b>Enhance understanding of fair housing and fair housing law</b>	Resistance to affordable housing Discriminatory actions in the market place Lack of understanding of where to turn	Discriminatory terms and conditions in Rental Failure to make reasonable accommodation	One seminar, training, or outreach event each year	City of Lewisville
<b>Discussion:</b> Public input and stakeholder comments revealed that there is additional need for fair housing outreach and trainings. Housing complaint data registered many complaints based upon failure to make reasonable accommodation. City Staff will speak at a Greater Lewisville Association of Realtors (GLAR) meeting to discuss Fair Housing annually. Flyers regarding Fair Housing will be provided to Mobilizing Area Resources to You (MARTY), which is deployed around Lewisville to bring City Hall out into the community. City Staff will speak annually at a Neighbors Leading Neighbors quarterly meeting, which is a public education session for leaders within the community, about Fair Housing. The City website will also be enhanced to include more information on Fair Housing.				
<b>Promote the development of accessible and affordable housing</b>	Access to financial Services Availability of affordable units in a range of sizes Access to publicly supported housing for persons with disabilities Lack of affordable, accessible housing for seniors	Limited access to financial services Limited affordable housing, especially for minorities and seniors	Fund housing rehabilitation for 10 units by the year 2021-2022.	City of Lewisville
<b>Discussion:</b> The City of Lewisville has an increasing number of households with housing problems, especially cost burdens. While it impacts 29.0 percent of white households, over 41 percent of black households and 48 percent of Hispanic households experience housing problems. In addition, based on public input and stakeholder feedback, seniors and residents with disabilities face limitations in the supply of accessible, affordable housing. The number of housing units available to all income levels are limited, as shown by the high level of cost burden within the City. Promoting the rehabilitation of housing options accessible to a range of income levels will help alleviate the restriction in access to housing throughout the City.				
<b>Enhance financial literacy and promote equitable access to credit and home lending</b>	Lending Discrimination Private discrimination Access to financial services	Disproportionate high denial rates for racial and ethnic minorities Lack of understanding of credit and mortgage application process	One seminar, trainings, or outreach event each year	City of Lewisville
<b>Discussion:</b> Denial rates for owner-occupied home purchases varied by the race/ethnicity of the applicant. Denial rates for Hispanic households were over twelve percentage points higher than for white applicants. Enhancing financial literacy through seminars and trainings, as well as partnerships with outside agencies is one step that the City of Lewisville will take to ensure financial literacy is not a hurdle that households continue to face. City Staff will speak annually at a Neighbors Leading Neighbors quarterly meeting, which is a public education session for leaders within the community, about Fair Housing. The City website will also be enhanced to include more information on Fair Housing.				
<b>Review and Revise Local Land use Policies</b>	Resistance to affordable housing Siting selection policies Practices and decisions for publicly supported housing	Resistance to affordable housing Prospective discriminatory practices and policies NIMBYism Availability of affordable units in a range of sizes	Conduct a review of land use policies and regulations by 2021-22	City of Lewisville
<b>Discussion:</b> The availability of housing accessible to a variety of income levels and protected classes may be limited by zoning and other local policies that limit the production of affordable units. Review of local land use policies may positively impact the placement and access of publicly supported and affordable housing. The availability of units in a range of sizes may be limited by the current zoning practices. The City of Lewisville has not revised zoning and development policies since the 1970's. The City will be conducting small area plans with community engagement for two pilot areas in 2017. Once this pilot program is finished the City will complete a rewrite of our zoning and development code regulations.				
<b>Enhance fair housing</b>	Discriminatory actions in the market place	Discriminatory terms,	Reach out to North Texas	City of Lewisville

<b>enforcement and reduce market discrimination</b>	Lack of understanding of where to turn for fair housing Lack of knowledge of fair housing law Resistance to affordable housing	conditions, or privileges relating to rental	Fair Housing Center to: 1) Provide outreach and education on a yearly basis; and, 2) Provide fair housing seminars, at least bi-annually
<b>Discussion:</b> Input received from the 2016 Fair Housing Survey, as well as testimony received at the public engagement activities, demonstrated that while the organizational infrastructure is in place and available, many people still do not use the fair housing system.			
<b>Enhance community access to vital health and social services</b>	Resistance to affordable housing Lack of quality health care for some racial minorities	Disparities in Access to Opportunity Access to healthy neighborhoods	Fund promotion of increased access to social and health services throughout City each year City of Lewisville
<b>Discussion:</b> As demonstrated by public input, as well as demonstrated by the access to opportunities discussion, households within the City of Lewisville have limited access to some vital services. The Chin population in the City of Lewisville has grown significantly in recent years. This community, in particular, has limited access to health services in the City. The City will fund a health services project during the 2017 Plan Year with CDBG funds. Additionally, the City will make efforts to increase access for minority populations, seniors, and other at-need groups to services, especially in areas where public transportation limits mobility. The City will review applications for CDBG social service funding options that enhance access to health and social services, and use CDBG funds to improve access to such services throughout the next five years.			

## **SECTION II. COMMUNITY PARTICIPATION PROCESS**

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The following section describes the community participation process undertaken for the 2017 City of Lewisville Assessment of Fair Housing.

### **A. OVERVIEW**

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The outreach process included the 2016 Fair Housing Survey, a series of two Fair Housing Forum, a public review meeting, and a final presentation.

The Fair Housing Survey was distributed as an internet outreach survey, and was available in both English and Spanish.

The 2016 City of Lewisville Fair Housing Forums were held on November 1 and November 15, 2016. The purpose of these meetings were to provide members of the public with an overview of fair housing policy and the AFH process, as well as an opportunity to provide feedback on the process and their experience with fair housing in the City of Lewisville. Sign-in sheets from the meeting are included in the Appendix A. In addition to consultations noted below, organizations represented at the public forums included: the Denton Housing Authority, Chin Refugee Ministries, Westside Baptist Church and the Lewisville CDBG Advisory Committee.

North Texas Fair Housing Center  
City of Denton  
Denton Housing Authority  
City of Lewisville Planning & Zoning office

Efforts to publicize the forums, final public hearing, surveys and solicitations of public comments included placement of legal notices in the Denton Record Chronicle on 10/28, 12/2 and 12/16/16; placement of paid print advertisement in the Lewisville Leader on 10/28, 11/4 and 11/11/16; emails to various community groups on 10/28, 11/10, 11/15, 11/30 and 12/16/16 – the following groups received at least two and some up to five email - Neighbors Leading Neighbors (72 members), church leaders (15), Leadership Lewisville (22), Homebuyer education partners (5), Homebuyer program past participants (67), housing repair wait list (15), apartment managers (4), homeless coalition (265), social service roundtable list (102 contacts for 66 organizations); the online survey was extended through the 30-day public comment period, but as this period coincided with the holiday season through the month of December, it was not practical for partner social service agencies to assist in promoting the survey; the survey, notices, messages in English and Spanish, links to HUD sites and draft copies were placed on the Lewisville City website; a media packet was released on 11-15-16 including placement on the main page of the website, City public calendars, facebook and twitter posts and release to newspapers.

Two email groups, the homeless coalition and the social service roundtable list are our main forms of outreach to service providers and non-profit groups. These groups include agencies that serve or advocate for underserved populations including but not limited to: Special Abilities of North Texas, the local office of the Texas Dept. of Rehabilitative Services, Abled-Disabled, Chin Refugee Ministry, Christian Community Action, Lewisville Salvation Army, etc.

## B. THE 2016 FAIR HOUSING SURVEY

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The purpose of the survey, a relatively qualitative component of the AFH, 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 individuals and organizations throughout the city were invited to participate. At the date of this draft, some 128 responses were received.

The following are responses from the 2016 Fair Housing Survey. The complete set of responses, along with comments are included in the Appendix. There were 128 respondents to the survey at the date of this document. The most common respondent roles were local government. A majority of respondents were homeowners, residents of Lewisville, and a majority were white. Most respondents were not disabled and were between the ages of 18 and 65.

**Table II.1**  
**Role of Respondent**

City of Lewisville  
2016 Fair Housing Survey Data

Primary Role	Total
Local Government	22
Advocate/Service Provider	6
Construction/Development	1
Law/Legal Services	1
Service Provider	1
Other Role	4
Missing	91
<b>Total</b>	<b>128</b>

Respondents were primarily not familiar or somewhat with fair housing laws, as seen in Table II.2.

**Table II.2**  
**How Familiar are you with Fair Housing Laws?**

City of Lewisville  
2016 Fair Housing Survey Data

Familiarity	Total
Not Familiar	43
Somewhat Familiar	43
Very Familiar	5
Missing	37
<b>Total</b>	<b>128</b>

A majority of respondents think fair housing laws are useful, but the most number of respondents indicated that fair housing laws are not adequately enforced. This is seen in Table II.3, on the following page.

**Table II.3**  
**Federal, State, and Local Fair Housing Laws**  
 City of Lewisville  
 2016 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	60	6	25	37	128
Are fair housing laws difficult to understand or follow?	25	24	42	37	128
Do you think fair housing laws should be changed?	21	17	51	39	128
Do you think fair housing laws are adequately enforced?	20	47	12	49	128

Most respondents are not aware of training available in the community, and only six respondents have participated in fair housing training. Also, only four respondents were aware of fair housing testing.

**Table II.4**  
**Fair Housing Activities**  
 City of Lewisville  
 2016 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total	
Is there a training process available to learn about fair housing laws?	20	47	12	49	128	
Have you participated in fair housing training?	4	26	5	93	128	
Are you aware of any fair housing testing?	6	49	23	50	128	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	15	14	2	47	50	128
Is there sufficient testing?	5	7	2	65	49	128

In the private sector, respondents were not aware of questionable practices or barriers to fair housing, as seen in Table II.5.

**Table II.5**  
**Barriers to Fair Housing in the Private Sector**  
 City of Lewisville  
 2016 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
<b>Are you aware of any questionable practices or barriers to fair housing choice in:</b>					
The rental housing market?	6	48	18	56	128
The real estate industry?		44	24	60	128
The mortgage and home lending industry?	5	44	23	56	128
The housing construction or accessible housing design fields?	4	44	23	57	128
The home insurance industry?	1	44	24	59	128
The home appraisal industry?	5	41	25	57	128
Any other housing services?	3	42	25	58	128

Similarly, in the public sector, few respondents were aware of questionable practices or barriers to fair housing in any of the given areas, as seen in Table II.6.

**Table II.6**  
**Barriers to Fair Housing in the Public Sector**  
 City of Lewisville  
 2016 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
<b>Are you aware of any questionable practices or barriers to fair housing choice in:</b>					
Land use policies?	6	35	24	63	128
Zoning laws?	5	35	24	64	128
Occupancy standards or health and safety codes?	8	36	21	63	128
Property tax policies?	2	36	28	62	128
Permitting process?	3	33	29	63	128
Housing construction standards?	1	34	30	63	128
Neighborhood or community development policies?	5	34	25	64	128
Limited access to government services, such as employment services?	6	38	21	63	128
Public administrative actions or regulations?	2	30	31	65	128

### C. PUBLIC INPUT MEETINGS

The final public hearing was held on December 19 in front of City Council and there were no speakers. There were two written submissions at the end of the comment period. None were from local residents. One was from the Inclusive Communities Project and one from Texas Appleseed/ Texas Low Income Housing Information Service. The written comments are attached and are summarized below.

#### Fair Housing Forum Points

- Location of publicly assisted housing-where is it and why is there none on the map
- Lack of fair housing complaints-maybe too under reported
- Need for more affordable housing-rental and for-sale
- Lack of available land
- Need for education/training for renters, home buyers, and landlords
- Predatory lending, such as balloon payments
- Concentration of affordable housing in certain areas
- High cost of rent ranging between 750-1350 with the average around 1000
- Families needing to work multiple jobs to cover expenses
- Need to update zoning codes and ordinance-possible old zoning laws caused concentration of multi-family housing
- Low quality housing for sale in 150,000 range
- Vision 2025 shows people want more high-end homes
  - Lack of renters and low-income participation

Additional comments are included below, with complete comments included in the Appendix:

- It was unclear how public input impacted the planning process
- Additional local knowledge should be used to add to the fair housing discussion, particularly when discussing the Environmentally Health Neighborhoods

- Useful comparisons could be drawn between Lewisville and other jurisdictions in the region
- Three of the identified fair housing issues were related to the unavailability of affordable housing

Comments and discussion were meaningful but, as often happens, attendance was limited to those few residents and representatives who take enough interest in civic affairs to attend. Initial efforts to publicize an online survey generated some interest but not as much as hoped so the City extended the availability of the survey through the comment period. This, however, conflicted with the holiday season and it was not a good time to ask local non-profits for assistance in directing clients to the survey as it is their busiest time of year.

Written comments were received from two advocacy groups, Inclusive Communities Project (ICP) and Texas Appleseed/Texas Low Income Housing Information Service (both letters are in the appendices starting on p.133 of the public input attachment). Overall, the City accepts ICP's comments to the extent that they can reasonably be implemented, however ICP suggests that the City should take an advocacy role in engaging other jurisdictions which is not the City's role. The City will share the results of the AFH with the school district, neighboring jurisdictions and the City of Plano, but it does not intend to push other jurisdictions beyond providing information and sharing the goals adopted in this plan.

Texas Appleseed provided extensive comments. Many were process oriented and some related to goals and priorities. Their comments fall in three categories: community participation, fair housing analysis and goals and priorities. As relates to community participation, they correctly pointed out that the public draft of the AFH did not include enough discussion on outreach. This has been corrected in the final submission.

They also suggested more discussion of past impediments and actions. This has also been corrected in the final submission.

Regarding fair housing analysis, they were disappointed by the discussions on contributing factors, thought the AFH should have had more local data and knowledge and provided a list of specific issues they take with various AFH questions, tables and topics for analysis. The City finds that some of the comments are not accurate, require a level of detail or depth that was not called for by the AFH, or were inconsequential in developing goals and priorities.

Regarding goals, they find that the City was not detailed enough in providing metrics and milestones, they oppose credit education and financial literacy as an appropriate response to discriminatory practices, the propose that the City contract for fair housing testing and suggest that the City's effort to promote any new construction is inadequate unless it also takes siting into account. The City will look to HUD's review regarding metrics and milestones. We believe that financial literacy and credit education are called for given disparities evidenced by HMDA data. We are not opposed to testing, but did not promise this in our goals and priorities as there will be other competing priorities in the Con Plan. Siting issues for any proposed affordable housing in the future will be considered on a case-by-case basis. Given limited resources it is not certain that new affordable housing can be developed. If it is, placing it in higher opportunity areas is desirable but those decisions are also limited by many

other development constraints. Any rehabilitation of housing to preserve affordable housing stock will be sited in the same location. The City can consider these factors as it undergoes a review of zoning and development policies which is another AFH goal.

The local Chin population may not be accurately reported in data collection. The Chin population is an ethnic group from the Chin state in Myanmar, that are mostly refugees.<sup>2</sup> Lewisville is estimated to have a population of around 3,500, which, according to public comment, are believed to be largely underreported in the 7,941 Asian or Pacific Islander population in Table 1. If this accounting is accurate, this ethnic group would account for over 3.5 percent of the total population in Lewisville. An account from Becky Nelson, the Director of Chin Community Ministry, a non-profit for the Chin community provided the following information. A complete transcript is included in the attachments. Many of the Chin households are working poor, spending a high proportion of their income on housing. In addition, many Chin households are multi-generational and require multiple incomes to support housing costs. Being able to accurately represent the Chin in fair housing issues is another difficulty, due to a lack of internet and a language barrier. Any information would need to be translated, but also a Hakha Chin translation would have to include a conceptual translation because many English words do not have accurate translations into Chin.

## **D. THE FINAL PUBLIC REVIEW PROCESS**

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A 30-day public review process was held December 2 through January 2, 2017. The City received no written comments regarding this Plan.

It included a City Council Workshop on December 5 and a final presentation before City Council on December 19.



## SECTION III. ASSESSMENT OF PAST GOALS AND ACTIONS

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The City of Lewisville, Texas Analysis of Impediments to Fair Housing Choice was prepared in June 2012. This analysis highlighted seven impediments to fair housing choice in the city: lack of affordability and insufficient income; increased public awareness of fair housing rights and local fair housing legislation should be evaluated; lower number of applications, loan originations and approvals from minorities; poverty and low-income among minority populations; limited resources to assist lower income, and elderly and indigent homeowners maintain their homes and stability in neighborhoods.

Following completion of the last Analysis of Impediments, the City has included fair housing as a brief topic covered in homebuyer education classes for nearly 600 prospective homebuyers and it has promoted homeownership through down-payment and closing cost assistance. It was not successful in increasing the amount of affordable housing primarily because funding for housing and community development activities is limited and there are competing priorities for how community development dollars are spent. Inclusionary zoning as presented by the consultant for the Analysis of Impediments is actually not allowed in Texas.

### A. PAST IMPEDIMENTS AND ACTIONS

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In response to these impediments, the Analysis of Impediments outlined a series of actions and objectives to address barriers to fair housing choice in the city. The following is a list of those actions and objectives as adopted in the city's 2012-2017 Consolidated Plan for Housing and Community Development:

**Impediment: Lack of affordability and insufficient income.** Lack of affordability, that is households having inadequate income to acquire housing currently available in the market, may be the most critical impediment faced by all households in Lewisville.

**Remedial Actions:** Lewisville should continue to work with local banks, developers and non-profit organizations to expand the stock of affordable housing. The City has had success with its partnerships with banks and non-profits in leveraging federal funds with additional funding for affordable housing from non-entitlement fund sources. A continuation of these efforts should increase the production of new affordable housing units and assistance toward the purchase and renovation of housing in existing neighborhoods. Greater emphasis should also be placed on capacity building and technical assistance initiatives aimed at expanding non-profit, faith based organizations and private developers' production activities in the City. Alternative resources for housing programs should be sought from Fannie Mae, U.S. Department of Treasury Community Development Funding Institution (CDFI) program, Federal Home Loan Bank and other state and federal sources.

**Inclusionary Zoning,** also known as inclusionary housing, can be implemented by enacting provisions in the local Zoning or Development Ordinances that require a given share of new construction houses be affordable to people with low to moderate incomes. The term inclusionary zoning is derived from the fact that these ordinances

seek to counter exclusionary zoning practices which aim to exclude affordable housing from a jurisdiction through the zoning code. In practice, these policies involve placing restrictions on 10% - 30% of new houses or apartments in a given development in order to make the costs of the housing affordable to lower income households. The mix of "affordable" and "market-rate" housing in the same neighborhood is seen as beneficial by many, especially in jurisdictions where housing shortages have become acute. Inclusionary Zoning is becoming a common tool for local jurisdictions in the United States to help provide a wider range of housing options than the market provides on its own. The zoning code must be amended to include this provision and can also be applied when residential planned unit development zoning is requested. Implementation is triggered at the building permitting phase. Inclusionary Zoning could increase the resources for affordable housing through private developer built units or developer dollars allocated in lieu of building units. Inclusionary Zoning could also generate additional resources for affordable housing since the federal grant programs cannot address all of the City's needs for affordable housing. Based on the current level of build out in the City and limited development opportunities, it is recommended that the City consider Inclusionary Zoning in its future development plans.

**Impediment: Increased public awareness of fair housing rights and local fair housing legislation should be evaluated.** The City of Lewisville has not enacted a local Fair Housing Ordinance substantially equivalent to the federal Fair Housing Act. Therefore, our analysis of applicable fair housing laws focused on the State of Texas Fair Housing Act. In the analysis the state statutes were compared to the Federal Fair Housing Act. Our Analysis determined that state statute offered similar rights, remedies, and enforcement to the federal law and might be construed as substantially equivalent. The City of Lewisville is part of the enforcement geography afforded enforcement coverage by the Fort Worth Regional HUD FHEO Office. While the current system provides an acceptable process for filing and investigating fair housing complaints, increased local fair housing outreach, education and training would be an important step toward raising local awareness and establishing more effective local Fair Housing Policy.

**Remedial Actions:** The City of Lewisville should continue increasing fair housing education and outreach in an effort to raise awareness and increase the effectiveness of its local fair housing ordinances. The City should target some of its CDBG funding to fair housing education and outreach to the rapidly growing Hispanic and other immigrant populations. The City should also continue organizing fair housing workshops or information sessions to increase awareness of fair housing rights among immigrant populations and low income persons who are more likely to be entering the home-buying or rental markets at a disadvantage. Other alternatives for increasing awareness and effectiveness of fair housing include providing local enforcement. However, community development resources are limited and therefore local enforcement would necessitate additional funds for investigation and enforcement and expansion of 94 outreach and education. We do not recommend this approach at the current time assuming the State continues its' enforcement services in the local jurisdiction. Future consideration should be given to a regional approach to local enforcement, perhaps through a partnership of other local jurisdictions and the City of Lewisville, and a joint application for FHAP and FHIP funding being submitted to HUD.

**Impediment: Impacts of the Subprime Mortgage Lending Crises and increased Foreclosures.**

The housing foreclosure rates across the country continue to soar and the impacts are being felt in Texas as well. Numerous web sites are providing numerical counts and locations for homes with foreclosure filings across the country and for jurisdictions in the State of Texas. RealtyTrac.com shows 36 properties with foreclosure filings in May 2012 for Lewisville, 368 filings for Denton County and 58,486 properties foreclosure for the State of Texas in May 2012, representing 1 in every 870 homes in Texas in foreclosure.

**Remedial Actions:** The City of Lewisville should continue pursuing CDBG, HOME and Neighborhood Stabilization Program (NSP) funding if it becomes available to provide home buyer assistance and subsidies to homebuyers to acquire foreclosure property and get it back into commerce. Some of the buyers that have already acquired housing in Lewisville utilizing entitlement funds from the City and State will likely face the issues of foreclosure. The City should work with the State, National Non-Profit Housing Intermediaries and HUD to develop a program and identify funding that can help reduce the mortgage default rate and foreclosure rates among low and moderate income home buyers and existing home owners. Other alternatives being evaluated include the feasibility of creating a mortgage default and foreclosure prevention account for affordable home buyers assisted with federal funds to insure that funds are escrowed to help cover the cost of unexpected income/job loss and to write down interest rates.

**Impediment: Lower number of applications, loan originations and approvals from minorities.**

The analysis the Home Mortgage Disclosure Act data for Lewisville indicates that the overall experience of minority groups within the home mortgage loan market differs from that of Whites. We recognize that removal of this impediment is not solely within the control of the government, and that finance industry policies, consumer credit worthiness, and economic trends all impact this issue. However, it is possible that the City could play a dual role of providing programming and leadership to help resolve the problem.

**Remedial Actions:** Lewisville should continue to pursue additional funding for homebuyer assistance and outreach and education efforts in order to increase the number of minorities who apply for and receive approval for mortgage loans. The City should encourage financial institutions and mortgage companies to expand their homebuyer support services to more people as a means of improving the origination rates among minorities. The City could help raise the awareness of this concern by discussing the findings in this study relative to the HMDA data with 99 lending institutions and by encouraging lenders to develop strategies to improve the success rate among minority loan applicants. Financial literacy is an important factor in the successful management of personal finances, which sets the stage for all of life's important purchases such as house, car, etc. A well-ordered personal budget prepares households to qualify with the best credit terms, eliminates the major obstacles in the home buying process, and enables households to build equity through homeownership. An early start in managing personal finances can prepare an individual for those major purchases. Lewisville should encourage lenders and the local school district to expand homeownership and credit counseling classes as part of the high school curriculum in

order to help prevent credit problems rather than attempting to correct credit profiles in order to successfully qualify an applicant for a home loan origination.

**Impediment: Predatory lending and other industry practices.** Predatory lending is a widespread concern in Lewisville. Several incidents were cited, by person interviewed and those attending the focus group sessions, suggesting unfavorable lending practices. In some of the minority neighborhoods, lending institutions display an insignificant presence in the community. In other low-income neighborhoods, traditional banking and lending relationships have been relegated to an overabundance of pay-day loan, check-cashing, and title-loan stores due to a lack of traditional lending institutions.

**Remedial Actions:** The City should encourage lending institutions to provide greater outreach to the low income and minority communities. Greater emphasis on establishing or reestablishing checking, saving, and credit accounts for residents that commonly utilize check-cashing services is desired. This may require traditional lenders and banks to establish “fresh start programs” for those with poor credit and previous noncompliant bank account practices. Lending institutions should therefore be encouraged to tailor products to better accommodate the past financial deficiencies of low income applicants with credit issues. City Officials should help raise awareness among the appraisal industry concerning limited comparability for affordable housing products. Industry representatives should be encourage to perform comparability studies to identify real estate comparables that more realistically reflect the values of homes being built in low income areas.

**Impediment: Poverty and low-income among minority populations.** For many households, low or no income is a major factor preventing their exercise of housing choice. Minority populations in the City are confronted with much larger numbers of their population living in poverty than Whites. The incidence of poverty among Hispanics was reported to be 18.1 percent, 9.3 percent for African-Americans, and 12.2 for Asians between 2005 and 2009. Among White persons, the data reported 3.3 percent lived in poverty. In comparison, the poverty rate for the city was 8.4 percent during the period.

**Remedial Actions:** The City and Chamber of Commerce should continue to work on expanding job opportunities through the recruitment of corporations, the provision of incentives for local corporations seeking expansion opportunities, assistance with the preparation of small business loan applications, and other activities whose aim is to reduce unemployment and expand the base of higher income jobs. A particular emphasis should be to recruit jobs that best mirror the job skills and education levels of those populations most in need of jobs. For Lewisville, this means jobs that support person with high school education, GED’s and in some instances, community college or technical training. These persons are evident in the workforce demographics and in need of jobs paying minimum wage to moderate hourly wages. The City should also continue to support agencies that provide workforce development programs and continuing education courses to increase the educational 105 level and job skills of residents. The goal should be to increase the GED, high school graduation, technical training, and college matriculation rates among residents. This will help in the recruitment of industry such as “call centers”, clerical and manufacturing jobs. Call

centers and customer service centers where employees are recruited to process sales or provide customer service support for various industries, have become more and more attracted to areas with similar demographics to that of Lewisville. The combination of well developed and well situated industrial parks and commercial parks available in Lewisville, government incentives for relocation and the workforce to support their industries, have all become incentives in recent years, and Lewisville is poised to continue and take advantage given its assets as well.

**Impediment: Limited resources to assist lower income, elderly and indigent homeowners maintain their homes and stability in neighborhoods.** Neighborhood decline and increasing instability in Lewisville’s older neighborhoods is a growing concern. Neighborhoods relatively stable today with most of its housing stock in good condition will decline if routine and preventive maintenance does not occur in a timely manner. The population is aging, which means more households with decreasing incomes to pay for basic needs. This increase in elderly households coupled with the steady rise in the cost of housing and the cost of maintaining housing means that many residents will not be able to limit their housing related cost to 30 percent of household income and still maintain their property. Rental property owners will be faced with increasing rents to pay for the cost of maintenance and updating units rendering rental units unaffordable to households as well.

**Remedial Actions:** The City should evaluate the design and implement a Centralized Program of Self-Help Initiatives based on volunteers providing housing assistance to designated elderly and indigent property owners and assist them in complying with municipal housing codes. This will require an organized recruiting effort to gain greater involvement from volunteers, community organizations, religious organizations/institutions and businesses as a means of supplementing available financial resources for housing repair and neighborhood cleanups.

## B. ADDITIONAL ACTIONS CONDUCTED

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### *Outreach and Education*

The City of Lewisville Grants Division receives fair housing complaints and makes referrals to HUD for enforcement. This agency is also responsible for conducting public education, training and outreach of fair housing rights and remedies in Lewisville. Education of the public regarding the rights and responsibilities afforded by fair housing law is an essential ingredient of fair housing enforcement. This includes outreach and education to the general public, landlords and tenants, housing and financial providers, as well as citizens, concerning fair housing and discrimination. It is important that potential victims and violators of housing and/or lending discrimination law be aware of fair housing issues generally, know what may constitute a violation, and what they can do in the event they believe they have been discriminated against. Likewise, it is important for lenders, housing providers, and their agents to know their responsibilities and when they may be violating fair housing law.

As noted in the city’s 2014 Consolidated Annual Performance and Evaluation Report (CAPER), the City completed several actions to promote education and awareness. In promoting these

activities, the City has referred clients to the Dallas Housing Crisis Center, made fair housing literature available in office displays, and sponsored Homebuyer Education classes.

### **Funding and Investment**

The City has invested CDBG funds to promote fair housing choice for its residents. In 2014, the City continues its First-Time home buyers program. The City also continued its agreement with the Denton Housing Authority for Section 8 vouchers. The City Council has provided variances to agencies/organizations/developers and homeowners on a case by case basis.

### **Success in Promoting Outreach and Education**

The City has been successful in promoting outreach and education by fostering a network of stakeholders, organizations, and providing outreach to the public. It continued to work with these parties throughout the previous consolidated planning cycle, providing homeownership education classes, referred clients to the Dallas Housing Crisis Center, provided fair housing literature, and continued its agreement with the Denton Housing Authority. Grants staff serve on a financial coaching committee developing new programming at United Way.

The City has also achieved some success in promoting access to affordable rental and homeownership housing, through the investment of CDBG funding.

## **C. PAST AND CURRENT GOALS**

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In several cases, goals that were set in previous fair housing planning documents continue to be barriers to fair housing in Lewisville. For example, the availability of affordable housing options has been a persistent need and meeting this need is an on-going goal for the City. In addition, the denial rates for homeownership levels for minority households was included as an impediment in previous planning documents, and has been identified as a continuing issue in the most recent fair housing document. The City continues to strive for affirmatively furthering fair housing in its efforts and identification of fair housing issues in the City.

## SECTION IV. FAIR HOUSING ANALYSIS

This section presents demographic, economic, and housing information. 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 illustrates the underlying conditions that shape housing market behavior and housing choice in Lewisville.

### A. DEMOGRAPHIC SUMMARY

In 2000, an estimated 77,737 people lived within the City as shown in Table IV.1. By 2010, the population in the City had grown by 22.6 percent, to an estimated 95,290 residents. The fastest-growing group during that time included residents aged 65 and older, rising over 88 percent over the period. While this cohort accounted for 6.5 percent of the population in 2010, up from 4.3 percent in 2000, such strong growth may imply that housing demands are strong for this elderly cohort.

**Table IV.1**  
**Population by Age**

City of Lewisville  
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Under 5	7,075	9.1%	7,894	8.3%	11.6%
5 to 19	15,570	20.0%	18,876	19.8%	21.2%
20 to 24	7,230	9.3%	8,426	8.8%	16.5%
25 to 34	18,195	23.4%	19,493	20.5%	7.1%
35 to 54	22,072	28.4%	26,843	28.2%	21.6%
55 to 64	4,284	5.5%	7,521	7.9%	75.6%
65 or Older	3,311	4.3%	6,237	6.5%	88.4%
<b>Total</b>	<b>77,737</b>	<b>100.0%</b>	<b>95,290</b>	<b>100.0%</b>	<b>22.6%</b>

The elderly population, which includes residents aged 65 and older, grew at a faster rate than the overall population between 2000 and 2010. As shown in Table IV.2, some 12.9 percent of the elderly cohort was aged 85 and older: an estimated 802 residents. This group grew considerably as a share of the overall elderly population between 2000 and 2010, as did residents aged 80 to 84.

**Table IV.2**  
**Population by Age**

City of Lewisville and Dallas-Ft Worth-Arlington CBSA  
2000 & 2010 Census SF1 Data

Age	Lewisville CDBG		Dallas-Ft Worth-Arlington CBSA	
	Population	% of Total	Population	% of Total
Under 18	24,968	25.67%	1,785,825	27.79%
18-64	66,015	67.86%	4,068,790	63.32%
65+	6,292	6.47%	571,599	8.89%

The youngest age cohort (under the age of 18) comprised a slightly smaller percentage in Lewisville than in the Dallas-Ft. Worth regional area, but residents aged 18-64 accounted for nearly four percentage points more of the Lewisville population than the regional area. Finally,

the 65+ cohort was nearly nine percent of the regional population, compared to a slightly-smaller 6.5 percent of the city's population.

**Table IV.3**  
**Elderly Population by Age**  
City of Lewisville  
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
65 to 66	499	15.1%	985	15.8%	97.4%
67 to 69	588	17.8%	1,180	18.9%	100.7%
70 to 74	821	24.8%	1,476	23.7%	79.8%
75 to 79	676	20.4%	1,022	16.4%	51.2%
80 to 84	382	11.5%	772	12.4%	102.1%
85 or Older	345	10.4%	802	12.9%	132.5%
<b>Total</b>	<b>3,311</b>	<b>100.0%</b>	<b>6,237</b>	<b>100.0%</b>	<b>88.4%</b>

White residents represented more than 77 percent of the study area population in 2000, but declined to 65.3 percent in 2010 and accounted for an estimated 62,263 residents in 2010. Residents classified as "other" race and black residents constituted the next largest percentage of the population at 11.8 percent and 11.2 percent, respectively. Asian residents grew at a rate of 144 percent between 2000 and 2010, accounting for 7.8 percent of the population in 2010. In addition, the Hispanic population expanded by over 101 percent between 2000 and 2010, rising from 17.8 to 29.2 percent, or reaching 27,783 persons in 2010.

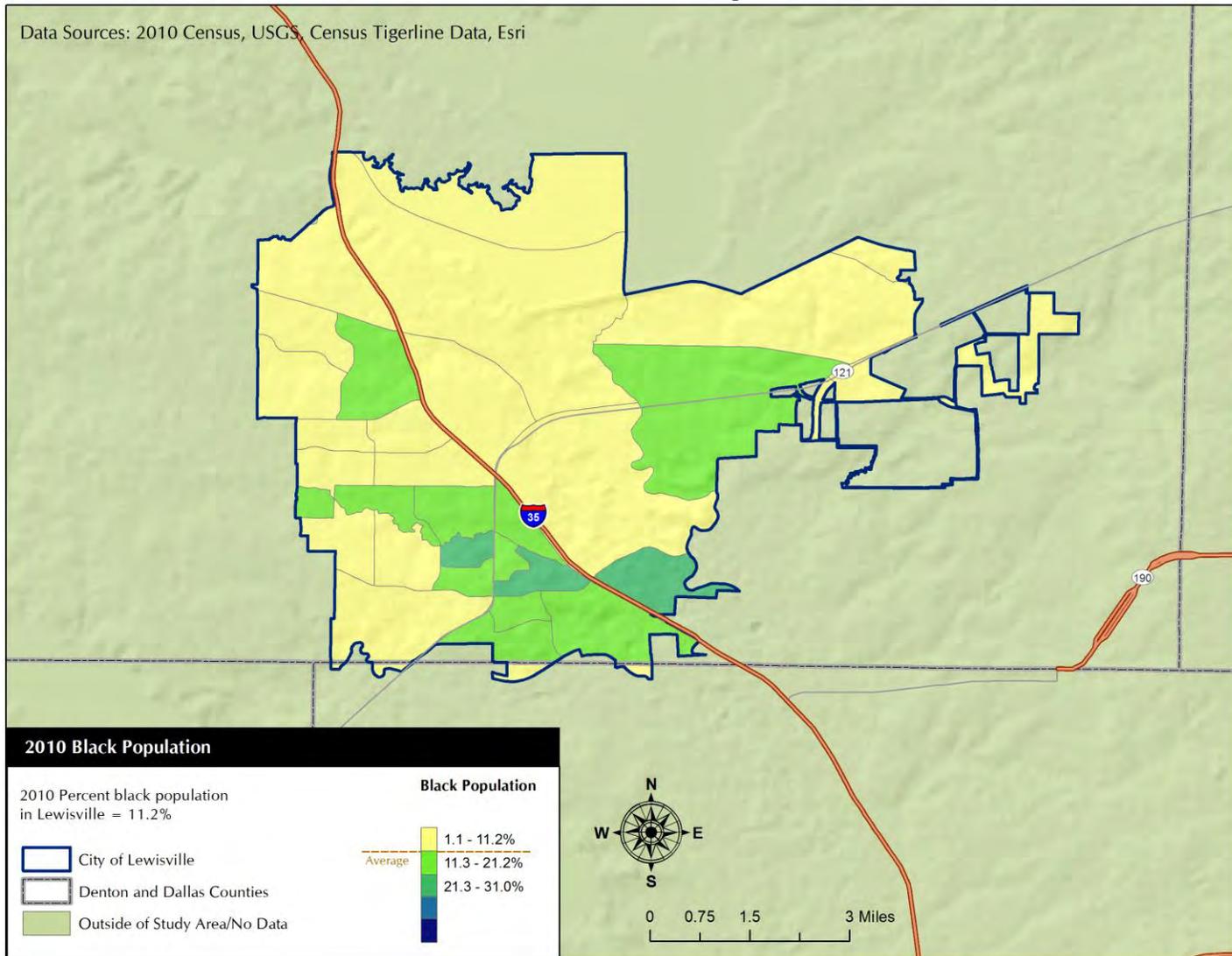
**Table IV.4**  
**Population by Race and Ethnicity**  
City of Lewisville  
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
White	60,015	77.2%	62,263	65.3%	3.7%
Black	5,747	7.4%	10,661	11.2%	85.5%
American Indian	544	.7%	623	.7%	14.5%
Asian	3,028	3.9%	7,392	7.8%	144.1%
Native Hawaiian/ Pacific Islander	25	.0%	67	.1%	168.0%
Other	6,468	8.3%	11,236	11.8%	73.7%
Two or More Races	1,910	2.5%	3,048	3.2%	59.6%
<b>Total</b>	<b>77,737</b>	<b>100.0%</b>	<b>95,290</b>	<b>100.0%</b>	<b>22.6%</b>
<b>Non-Hispanic</b>	<b>63,938</b>	<b>82.2%</b>	<b>67,507</b>	<b>70.8%</b>	<b>5.6%</b>
<b>Hispanic</b>	<b>13,799</b>	<b>17.8%</b>	<b>27,783</b>	<b>29.2%</b>	<b>101.3%</b>

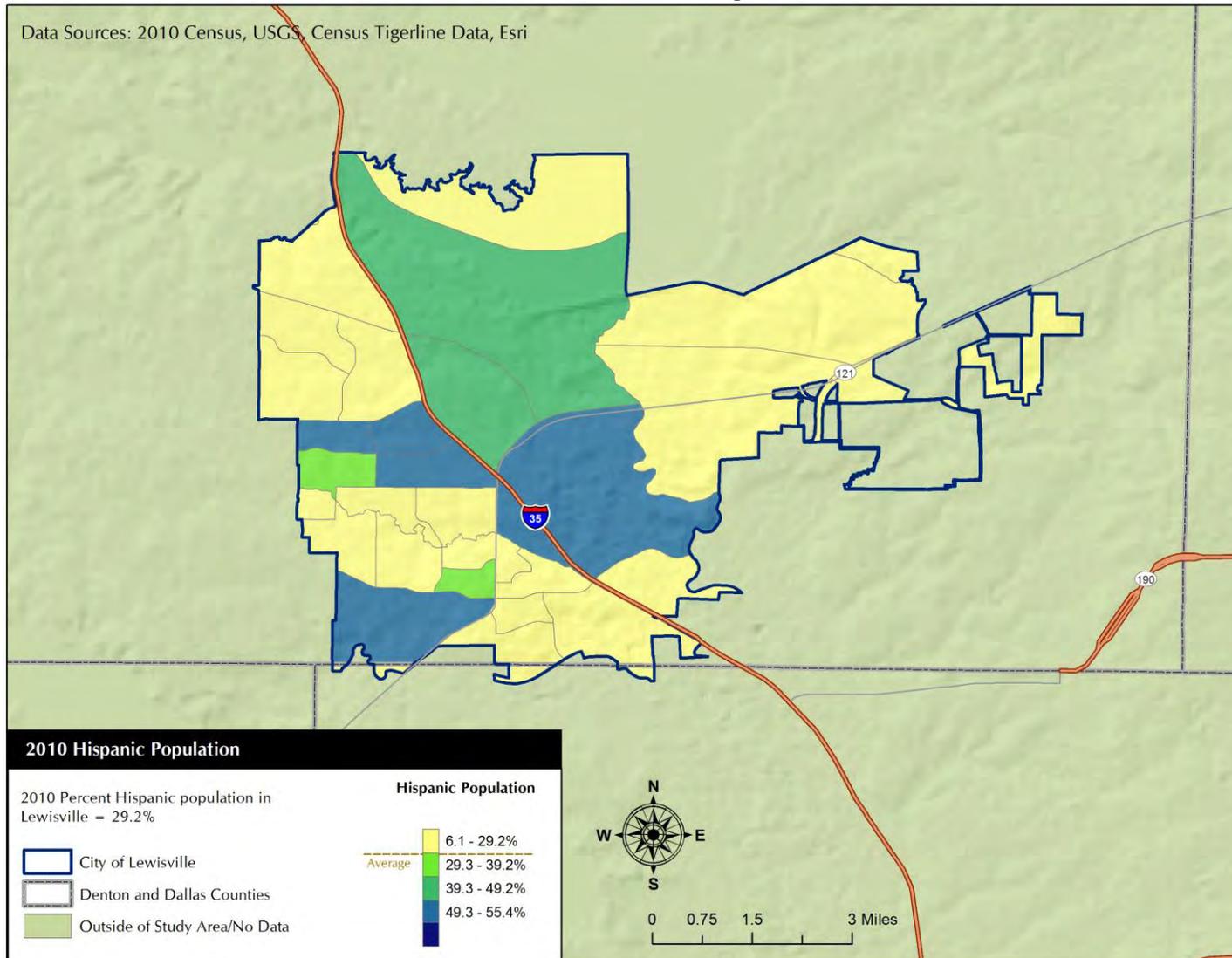
The geographic distribution of both Blacks and Hispanics demonstrates that concentrations of these minorities exist in the City of Lewisville, particularly for Hispanic residents. These distributions are presented in Maps IV.1 and IV.2, on the following pages.

In Map IV.1, several census tracts have concentrations of Black residents that exceed 21 percent, as seen in the southern portion of the City. In Map IV.2, the concentration of Hispanic households show that some areas exceed 49 percent. These areas are mainly located in the central part of the City, adjacent to I-35.

**Map IV.1**  
**Concentrations of Black Persons**  
 Lewisville, Texas  
 2010 Census, USGS, Census Tigerline



**Map IV.2**  
**Concentrations of Hispanic Persons**  
 Lewisville, Texas  
 2010 Census, USGS, Census Tigerline



Furthermore, ethnicity is a separate consideration from race<sup>3</sup>. The Hispanic population grew relatively rapidly from 2000 to 2010. Hispanic residents accounted for 17.8 percent of the study area population in 2000; an estimated 13,799 people. By 2010, the Hispanic population had grown by 101.3 percent, accounting for 29.2 percent of the population in that year.

**Table IV.5**  
**Population by Race and Ethnicity**  
City of Lewisville  
2010 Census & 2014 Five-Year ACS

Race	2000		2010 Census		% Change 00 - 10
	Population	% of Total	Population	% of Total	
<b>Non-Hispanic</b>					
White	53,706	84.0%	47,280	70.0%	-12.0%
Black	5,628	8.8%	10,370	15.4%	84.3%
American Indian	399	.6%	347	.5%	-13.0%
Asian	2,990	4.7%	7,325	10.9%	145.0%
Native Hawaiian/ Pacific Islander	22	.0%	59	.1%	168.2%
Other	89	.1%	220	.3%	147.2%
Two or More Races	1,104	1.7%	1,906	2.8%	72.6%
<b>Total Non-Hispanic</b>	<b>63,938</b>	<b>82.2%</b>	<b>67,507</b>	<b>70.8%</b>	<b>5.6%</b>
<b>Hispanic</b>					
White	6,309	45.7%	14,983	53.9%	137.5%
Black	119	.9%	291	1.0%	144.5%
American Indian	145	1.1%	276	1.0%	90.3%
Asian	38	.3%	67	.2%	76.3%
Native Hawaiian/ Pacific Islander	3	.0%	8	.0%	166.7%
Other	6,379	46.2%	11,016	39.7%	72.7%
Two or More Races	806	5.8%	1,142	4.1%	41.7%
<b>Total Hispanic</b>	<b>13,799</b>	<b>17.8%</b>	<b>27,783</b>	<b>29.2%</b>	<b>101.3%</b>
<b>Total Population</b>	<b>77,737</b>	<b>100.0%</b>	<b>95,290</b>	<b>100.0%</b>	<b>22.6%</b>

An estimated 8.4 percent of the study area population was living with some form of disability in 2010-2014, as shown in Table IV.6. Female residents, 8.9 percent of whom were living with a disability during that time, were more likely than male residents to have a disability: an estimated 7.9 percent of male residents had a disability in 2010-2014.

**Table IV.6**  
**Disability by Age**  
City of Lewisville  
2014 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	0	.0%	0	.0%	0	.0%
5 to 17	484	5.5%	440	5.2%	924	5.3%
18 to 34	629	4.5%	569	3.9%	1,198	4.2%
35 to 64	1,672	9.0%	1,807	9.8%	3,479	9.4%
65 to 74	500	23.6%	662	26.3%	1,162	25.0%
75 or Older	571	57.2%	972	52.7%	1,543	54.3%
<b>Total</b>	<b>3,856</b>	<b>7.9%</b>	<b>4,450</b>	<b>8.9%</b>	<b>8,306</b>	<b>8.4%</b>

<sup>3</sup> Respondents to the decennial Census and American Community Survey are asked about their race and ethnicity separately, meaning that those who identified themselves as "non-Hispanic" may also identify as any race. The same is true of those who identify their ethnicity as "Hispanic".

Overall, disability rates in Lewisville closely mirrored those of the wider region as seen below. The rates generally fall within a single percentage point of the rates of the Dallas-Ft Worth area, with the lone exception to this trend being Ambulatory Difficulty, which had a rate of 4 percent in the city and 5.26 percent in the region. In the case of all six disability types, the rates in Lewisville are lower than the Dallas-Ft Worth region.

**Table IV.7**  
**Disability by Type**  
City of Lewisville and Dallas-Ft Worth-Arlington CBSA  
Decennial Census; ACS

Disability Type	Lewisville		Dallas-Ft Worth-Arlington	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Hearing difficulty	2,152	2.40%	161,866	2.69%
Vision difficulty	921	1.03%	116,986	1.94%
Cognitive difficulty	3,148	3.52%	226,638	3.76%
Ambulatory difficulty	3,584	4.00%	316,777	5.26%
Self-care difficulty	1,443	1.61%	122,242	2.03%
Independent living difficulty	2,384	2.66%	204,582	3.40%

### Demographic Trends

As drawn from the AFH Assessment Tool, the population of Lewisville has grown considerably since 1990. At that time, there were a total of 43,834 residents in the city, 84.4 percent of whom were white (non-Hispanic), 4.5 percent of whom were black (non-Hispanic), and 8.4 percent of whom were Hispanic.<sup>4</sup>

**Table IV.8**  
**AFFH Table 2 – Demographic Trends**  
Lewisville, Texas  
2016 HUD AFFH Data

Race/Ethnicity	1990		2000		2010	
	#	%	#	%	#	%
White, Non-Hispanic	37,102	84.41%	54,256	70.56%	48,349	49.70%
Black, Non-Hispanic	1,978	4.50%	5,688	7.40%	10,523	10.82%
Hispanic	3,711	8.44%	12,465	16.21%	27,919	28.70%
Asian or Pacific Islander, Non-Hispanic	822	1.87%	3,513	4.57%	7,941	8.16%
Native American, Non-Hispanic	221	0.50%	635	0.83%	357	0.37%
<b>National Origin</b>						
Foreign-born	2,120	4.82%	9,297	12.08%	19,460	20.62%
<b>LEP</b>						
Limited English Proficiency	1,660	3.77%	6,744	8.76%	13,945	14.77%
<b>Sex</b>						
Male	22,040	50.09%	38,441	49.96%	47,984	49.33%
Female	21,960	49.91%	38,506	50.04%	49,291	50.67%
<b>Age</b>						
Under 18	11,857	26.95%	21,263	27.63%	24,968	25.67%
18-64	30,144	68.51%	52,418	68.12%	66,015	67.86%
65+	1,998	4.54%	3,266	4.24%	6,292	6.47%
<b>Family Type</b>						
Families with children	6,476	54.83%	4,447	57.52%	12,464	52.80%

<sup>4</sup> Except where otherwise noted, reference to racial groups included in this study will include only non-Hispanic residents. Those who fill out the Census questionnaire may identify themselves both as a member of a particular racial group and, in a separate question, as Hispanic or non-Hispanic. Where the narrative refers to "Hispanic" residents, those references will include Hispanic residents of any and all racial groups.

Over the following two decades, the population grew by nearly 61,000, or 140 percent. Population growth was especially pronounced among the City's minority (i.e., non-white and Hispanic) populations: the black population grew by almost 5,000 and accounted for 10.8 percent of the population in 2010. The Hispanic population had grown from 3,711 to nearly 28,000 over the same time period, accounting for 28.7 percent of the city population in 2010. By contrast, the white population declined as a proportion of the population slightly from 1990 to 2010. By 2010 the white population accounted for 48.7 percent of the population, compared to the over 84 percent in 1990.

The estimated 19,460 residents born outside of the United States accounted for approximately 20.6 percent of the population in 2010, up from 4.8 percent in 1990. Most commonly, these residents were born in Mexico, accounting for over 10 percent of the city population.

Some 13,945 residents had limited English proficiency (LEP) in 2010. The LEP population has grown considerably since 1990, when the 2,120 LEP residents in the city represented around 3.8 percent of the overall population. As of 2010, LEP individuals account for around 14.8 percent of the population. This represents a substantive portion of the population.

Over half of city families included children in 1990, or around 34,000 families. The proportion grew slightly by 2000, up from 54.8 percent in 1990 to 57.5 percent in 2000, but declined to 52.8 percent by 2010.

**Table IV.9**  
**Demographic Trends – Regional Compare**  
Dallas-Ft Worth-Arlington CBSA  
Decennial Census; ACS

Race/Ethnicity	1990		2000		2010	
	#	%	#	%	#	%
White, Non-Hispanic	2,825,080	70.28%	3,081,462	59.21%	3,248,508	50.55%
Black, Non-Hispanic	550,532	13.70%	727,172	13.97%	941,599	14.65%
Hispanic	525,911	13.08%	1,121,084	21.54%	1,758,738	27.37%
Asian or Pacific Islander, Non-Hispanic	93,837	2.33%	216,069	4.15%	343,585	5.35%
Native American, Non-Hispanic	16,177	0.40%	39,884	0.77%	25,032	0.39%
<b>National Origin</b>						
Foreign-born	318,894	7.93%	784,699	15.08%	1,141,778	17.77%
<b>LEP</b>						
Limited English Proficiency	244,151	6.08%	592,943	11.39%	804,900	12.53%
<b>Sex</b>						
Male	1,982,936	49.34%	2,587,764	49.72%	3,168,434	49.30%
Female	2,035,925	50.66%	2,616,474	50.28%	3,257,780	50.70%
<b>Age</b>						
Under 18	1,093,648	27.21%	1,496,274	28.75%	1,785,825	27.79%
18-64	2,596,689	64.61%	3,296,337	63.34%	4,068,790	63.32%
65+	328,525	8.17%	411,626	7.91%	571,599	8.89%
<b>Family Type</b>						
Families with children	527,721	50.34%	499,988	52.81%	822,439	51.21%

Like Lewisville, the Dallas-Ft Worth-Arlington CBSA has experienced considerable growth since 1990, with most of that growth occurring in the Hispanic population. This ethnicity has seen exponential growth since 1990, swelling from just over 525,000 in the region in 1990 to 1.7 million in 2010, a robust growth rate of 234 percent. The regional White population has

declined, in terms of overall makeup of the population, from nearly three-quarters in 1990 to half the regional population in 2010, but is still the largest ethnic group in the region by far with over 3.2 million residents.

Perhaps corresponding the large Hispanic growth in the region, the percentage of foreign-born residents has also grown since 1990 (although not nearly as markedly as the Hispanic population). This population has doubled from nearly 8 percent to nearly 18 percent in 2010. The regional Limited English Proficiency population has followed a similar trend over this time period.

### **Economics**

Households with incomes on the upper end and the lower end both grew for City residents from 2000 through 2010-2014, as measured in nominal dollars.<sup>5</sup> As shown in Table IV.10, the share of households with incomes of \$100,000 per year or more grew by 7.8 percentage points. Households with incomes between \$25,000 and \$75,000 fell as a percentage of the population. At the same time, households with incomes between \$15,000 and \$25,000 grew as a proportion of the population.

**Table IV.10**  
**Households by Income**

City of Lewisville  
2000 Census SF3 & 2014 Five-Year ACS Data

Income	2000 Census		2014 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than \$15,000	2,029	6.7%	1,906	5.0%
\$15,000 to \$19,999	976	3.2%	2,026	5.3%
\$20,000 to \$24,999	1,374	4.6%	1,804	4.7%
\$25,000 to \$34,999	3,589	11.9%	4,367	11.4%
\$35,000 to \$49,999	5,253	17.4%	5,699	14.9%
\$50,000 to \$74,999	7,629	25.3%	8,926	23.3%
\$75,000 to \$99,999	4,710	15.6%	4,780	12.5%
\$100,000 or More	4,559	15.1%	8,764	22.9%
<b>Total</b>	<b>30,119</b>	<b>100.0%</b>	<b>38,272</b>	<b>100.0%</b>

In spite of the fact that a larger percentage of households were earning \$100,000 or more in 2010-2014 than were in 2000, the poverty rate rose from 6.0 to 10.6 percent over that same time period. As shown in Table IV.11, a majority of those living in poverty were aged 18 to 64 at both points in time.

**Table IV.11**  
**Poverty by Age**

City of Lewisville  
2000 Census SF3 & 2014 Five-Year ACS Data

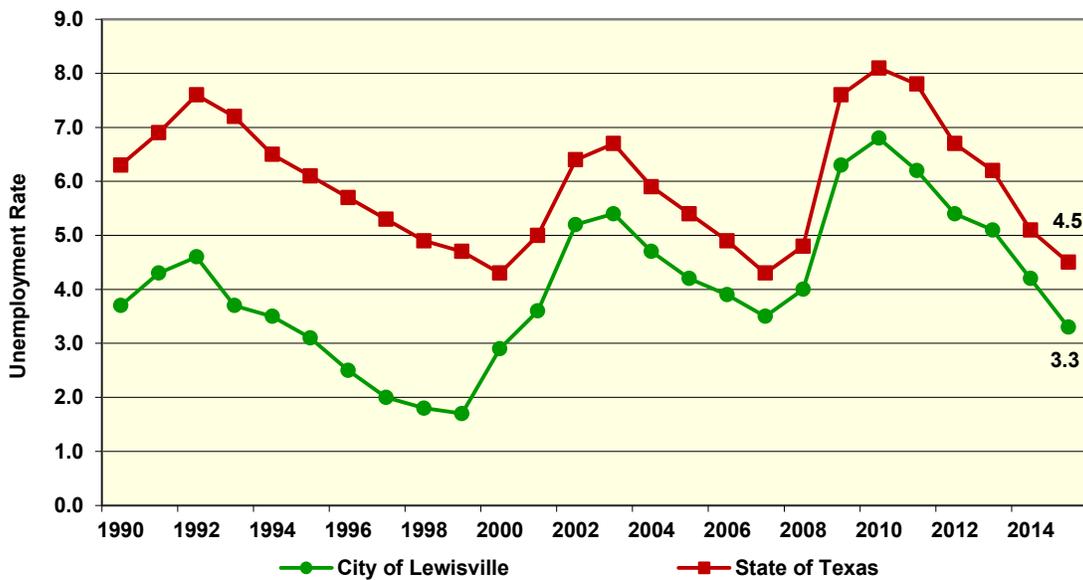
Age	2000 Census		2014 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	576	12.4%	1,935	18.6%
6 to 17	841	18.2%	2,538	24.4%
18 to 64	2,913	62.9%	5,563	53.5%
65 or Older	299	6.5%	359	3.5%
<b>Total</b>	<b>4,629</b>	<b>100.0%</b>	<b>10,395</b>	<b>100.0%</b>
<b>Poverty Rate</b>	<b>6.0%</b>	.	<b>10.6%</b>	.

<sup>5</sup> Nominal dollars, unlike real dollars, have not been adjusted for inflation.

In Lewisville, poverty is indeed concentrated in selected areas of the City, as seen in Map IV.3. Areas with the highest concentrations of poverty are located in the central and southern portions of the City.

From 1990 through 2008, growth in the number of employed generally kept pace with changes in the size of the labor force. Employment dropped off after 2008 by over 3,400 by 2010. By 2015, however, employment had grown to 59,783. The result, as shown in Diagram IV.1, was an increase in the unemployment rate, which topped 6.8 percent in 2010. Since that time, the gap between the number of employed and the number in the labor force has narrowed, contributing to a steady decline in unemployment. By 2015, the unemployment rate in the City had declined to 3.3 percent. The City followed similar unemployment trends to the State of Texas, but remained below state levels; the state's unemployment level in 2015 was 4.5 percent.

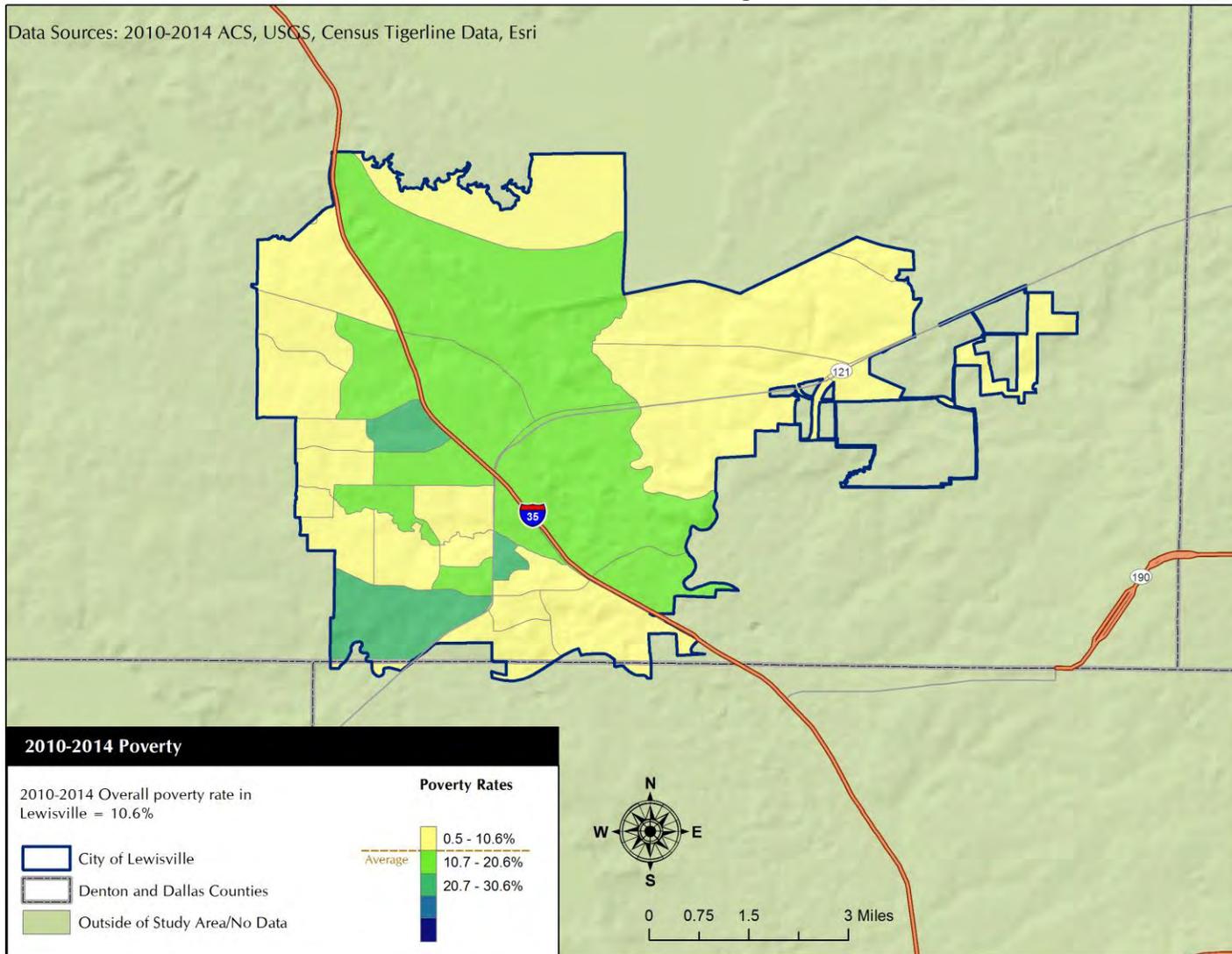
**Diagram IV.1**  
**Unemployment Rate**  
 City of Lewisville vs. State of Texas  
 1990 - 2015 BLS Data



### Map IV.3 Concentrations of Poverty

Lewisville, Texas

2010-2014 ACS, USGS, Census Tigerline



## HOUSING AND HOUSEHOLDS

An estimated 47.5 percent of housing units were single family units in 2014. Apartments accounted for 46.5 percent in 2014, and mobile homes accounted for 4.3 percent of units.

**Table IV.12**  
**Housing Units by Type**

City of Lewisville  
2000 Census SF3 & 2014 Five-Year ACS Data

Unit Type	2000 Census		2014 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	16,841	53.1%	19,698	47.5%
Duplex	134	.4%	176	.4%
Tri- or Four-Plex	778	2.5%	433	1.0%
Apartment	12,090	38.1%	19,284	46.5%
Mobile Home	1,819	5.7%	1,793	4.3%
Boat, RV, Van, Etc.	58	.2%	44	0.1%
<b>Total</b>	<b>31,720</b>	<b>100.0%</b>	<b>41,428</b>	<b>100.0%</b>

An estimated 54.6 percent of the white population lived in single-family housing units in 2014, as shown in Table IV.13 while 39.5 percent lived in apartments. On the other hand, some 27.4 percent of black households lived in single family homes, while over twice as many blacks lived in apartments, over 71 percent of black residents.

**Table IV.13**  
**Distribution of Units in Structure by Race**

City of Lewisville  
2014 Five-Year ACS Data

Unit Type	White	Black	American Indian	Asian	Native Hawaiian/Pacific Islanders	Other	Two or More Races
Single-Family	54.6%	27.4%	36.8%	46.8%	100.0%	30.9%	32.8%
Duplex	.5%	.4%	13.2%	.8%	.0%	.0%	.0%
Tri- or Four-Plex	1.0%	1.2%	.0%	1.7%	.0%	1.4%	1.0%
Apartment	39.5%	71.1%	50.0%	48.9%	.0%	41.3%	62.7%
Mobile Home	4.4%	.0%	.0%	1.8%	.0%	26.3%	2.6%
Boat, RV, Van, Etc.	.1%	.0%	.0%	.0%	.0%	.0%	.8%
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

More than 94 percent of housing units in Lewisville were occupied in 2000, but this decline to 93.8 percent in 2010, as shown in Table IV.14. The composition of owner and renter occupied housing units changed between 2000 and 2010, with an 8.2 percentage point decline in owner occupied housing. Vacant housing units grew from 5.4 percent of units in 2000 to 6.2 percent in 2014. A majority of vacant housing units were available for sale or for rent in 2000 and 2010, as shown in Table IV.15. Around nine percent of vacant units were classified as "other vacant" in 2010.

**Table IV.14**  
**Housing Units by Tenure**  
 City of Lewisville  
 2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	30,043	94.6%	37,496	93.8%	24.8%
Owner-Occupied	16,184	53.9%	17,152	45.7%	6.0%
Renter-Occupied	13,859	46.1%	20,344	54.3%	46.8%
Vacant Housing Units	1,721	5.4%	2,471	6.2%	43.6%
<b>Total Housing Units</b>	<b>31,764</b>	<b>100.0%</b>	<b>39,967</b>	<b>100.0%</b>	<b>25.8%</b>

By 2014, owner-occupied housing units accounted for 44.6 percent of housing units. Renter-occupied housing units grew to account for 55.4 percent of units. The housing stock as a whole grew by around 25.8 percent over the decade, as noted in Table IV.14, above.

**Table IV.15**  
**Housing Units by Tenure**  
 City of Lewisville  
 2010 Census & 2014 Five-Year ACS Data

Tenure	2010 Census		2014 Five-Year ACS	
	Units	% of Total	Units	% of Total
Occupied Housing Units	37,496	93.8%	38,272	92.4%
Owner-Occupied	17,152	45.7%	17,060	44.6%
Renter-Occupied	20,344	54.3%	21,212	55.4%
Vacant Housing Units	2,471	6.2%	3,156	7.6%
<b>Total Housing Units</b>	<b>39,967</b>	<b>100.0%</b>	<b>41,428</b>	<b>100.0%</b>

According to recent estimates from the 2010-2014 ACS, the percentage of vacant units in the City has grown since 2010. "Other" vacant units also grew as a proportion of vacant housing units by 2014. "Other vacant" units can present more of a problem than other types of vacant housing units, as they are often not available to the market place. Without regular maintenance, they may fall into dilapidation and contribute to blight in areas where they are highly concentrated. In 2014, there were an estimated 3,156 vacant units, some 959 of which were classified as "other" vacant, accounting for 30.4 percent of vacant units in 2014, as noted in Table IV.16, below.

**Table IV.16**  
**Disposition of Vacant Housing Units**  
 City of Lewisville  
 2010 Census & 2014 Five-Year ACS Data

Disposition	2010 Census		2014 Five-Year ACS	
	Units	% of Total	Units	% of Total
For Rent	1,729	70.0%	1,283	40.7%
For Sale	276	11.2%	165	5.2%
Rented or Sold, Not Occupied	125	5.1%	521	16.5%
For Seasonal, Recreational, or Occasional Use	105	4.2%	228	7.2%
For Migrant Workers	0	0.0%	0	.0%
Other Vacant	236	9.6%	959	30.4%
<b>Total</b>	<b>2,471</b>	<b>100.0%</b>	<b>3,156</b>	<b>100.0%</b>

Households with five or more persons grew as a percentage of households between 2000 and 2010, with households having six or seven or more persons expanding far more rapidly than

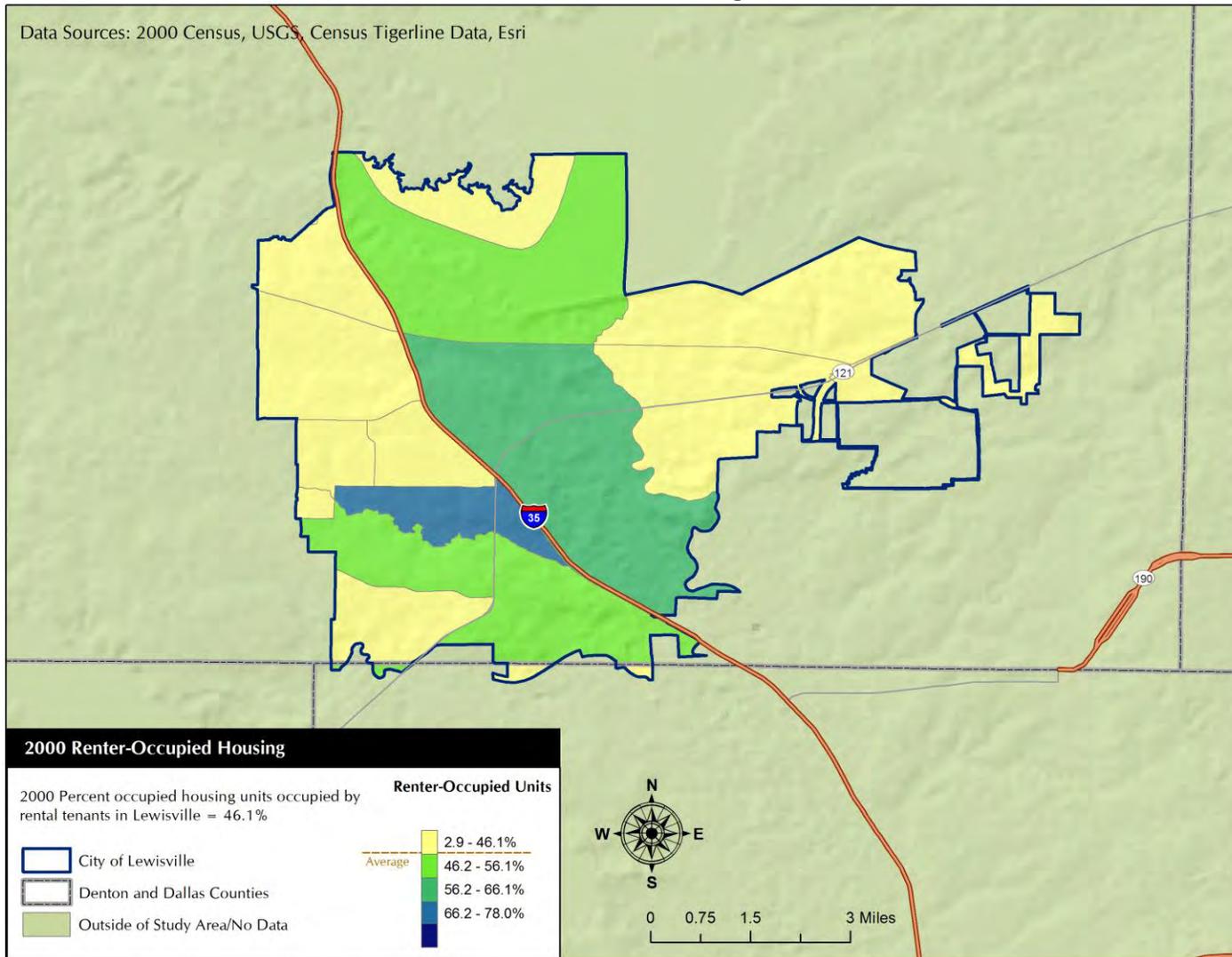
the average, rising some 63 and 59 percent over the time period. Households with two to four persons fell as a proportion of households, as seen in Table IV.17.

**Table IV.17**  
**Households by Household Size**  
 City of Lewisville  
 2000 & 2010 Census SF1 Data

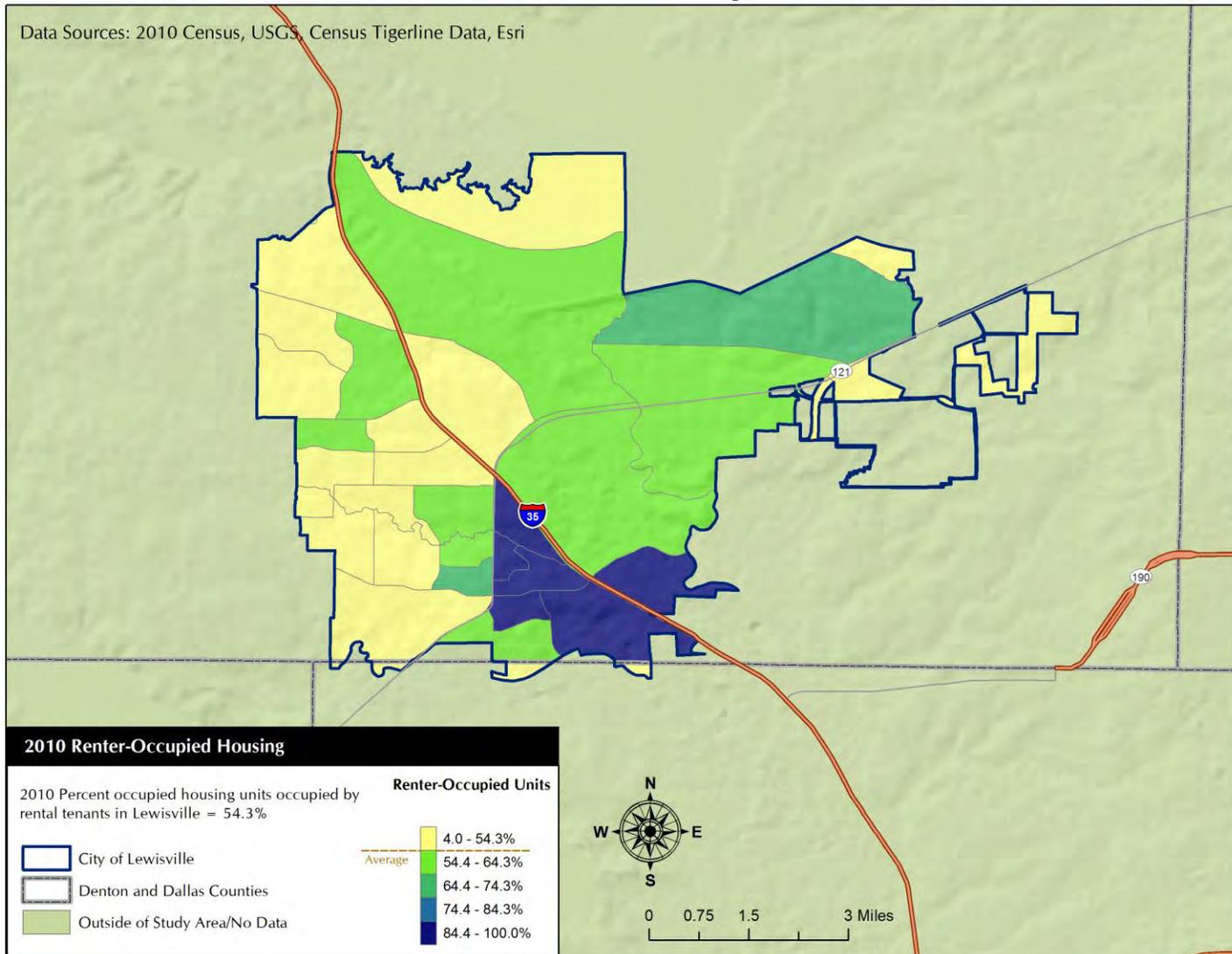
Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	7,581	25.2%	11,292	30.1%	49.0%
Two Persons	9,928	33.0%	11,359	30.3%	14.4%
Three Persons	5,255	17.5%	5,994	16.0%	14.1%
Four Persons	4,421	14.7%	4,756	12.7%	7.6%
Five Persons	1,753	5.8%	2,308	6.2%	31.7%
Six Persons	611	2.0%	998	2.7%	63.3%
Seven Persons or More	494	1.6%	789	2.1%	59.7%
<b>Total</b>	<b>30,043</b>	<b>100.0%</b>	<b>37,496</b>	<b>100.0%</b>	<b>24.8%</b>

Renter-occupied housing has been largely concentrated in central areas of the city since 2000, when 46.1 percent of occupied units throughout the city were occupied by rental tenants. By 2010, higher concentrations of renter-occupied units were found on the southern end of the city, as seen in Map IV.5. By contrast, owner-occupied units tended to be concentrated in the outer areas of the city, as shown in Maps IV.6 and IV.7.

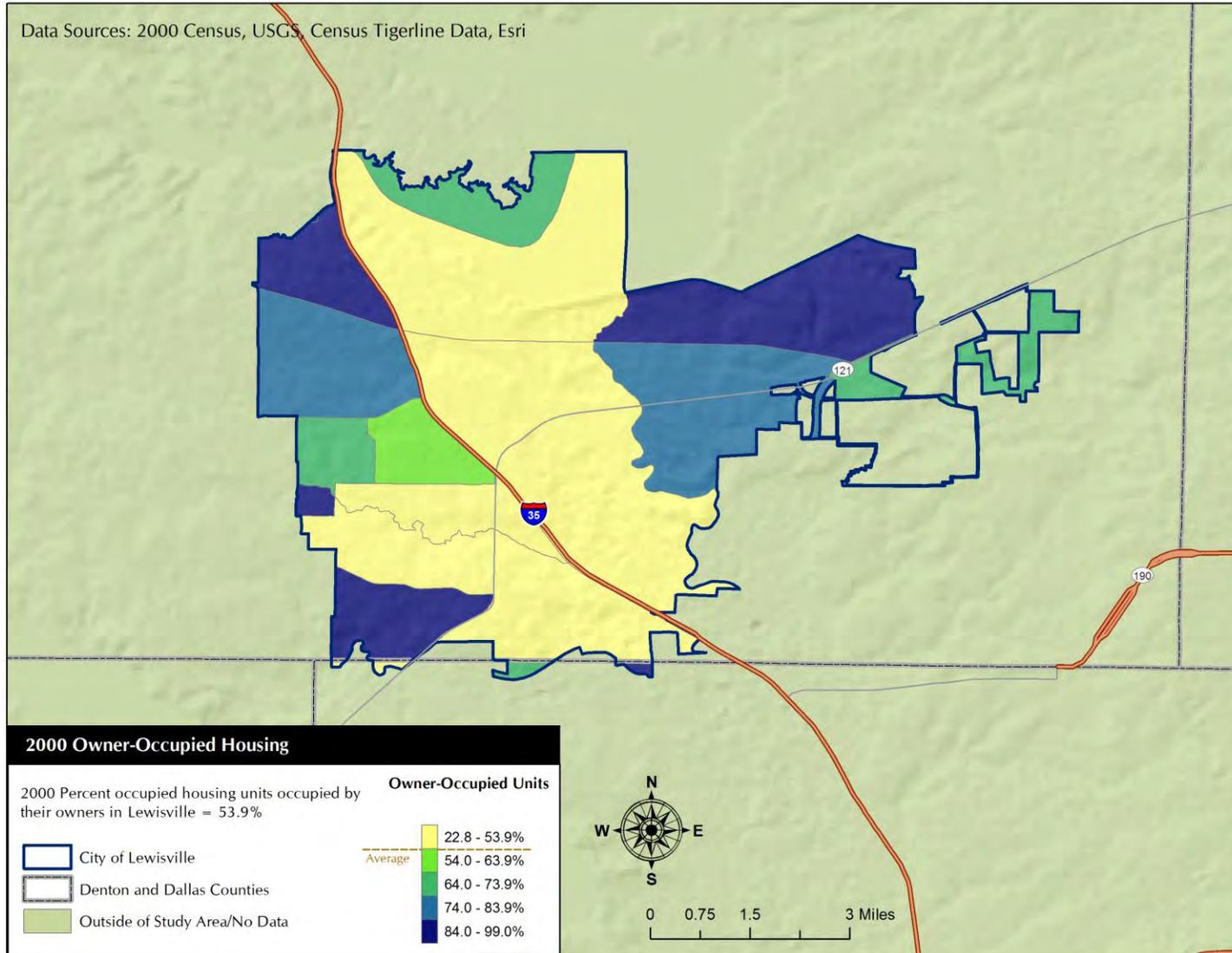
**Map IV.4**  
**2000 Renter Occupied Housing**  
 Lewisville, Texas  
 2010 Census, USGS, Census Tigerline



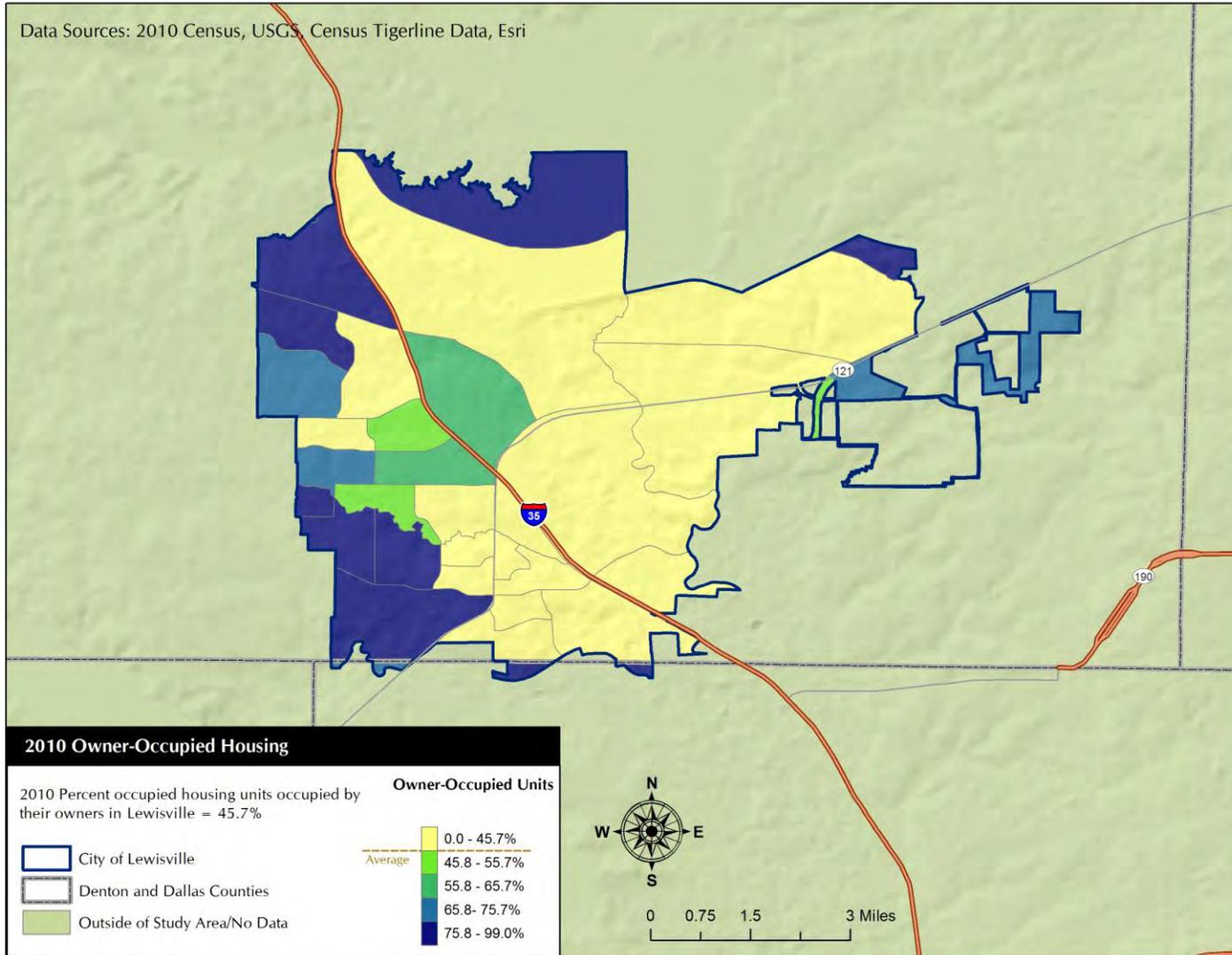
**Map IV.5**  
**2010 Renter Occupied Housing**  
 Lewisville, Texas  
 2010 Census, USGS, Census Tigerline



**Map IV.6**  
**2000 Owner Occupied Housing**  
 Lewisville, Texas  
 2010 Census, USGS, Census Tigerline



**Map IV.7**  
**2010 Owner Occupied Housing**  
 Lewisville, Texas  
 2010 Census, USGS, Census Tigerline



## B. SEGREGATION AND CONCENTRATIONS OF POVERTY

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### SEGREGATION/INTEGRATION

The “dissimilarity index” provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., city), then the dissimilarity index score for that city will be 0. By contrast; and again using Census tracts as an example; if one population is clustered entirely within one Census tract, the dissimilarity index score for the city will be 1. The higher the dissimilarity index value, the higher the level of segregation in an area.

#### *A Technical Note on the Dissimilarity Index Methodology*

The dissimilarity indices included in this study were calculated from data provided by the Census Bureau according to the following formula:

$$D_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^N \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where  $i$  indexes a geographic unit,  $j$  is the  $j$ th jurisdiction,  $W$  is group one and  $B$  is group two, and  $N$  is the number of geographic units, starting with  $i$ , in jurisdiction  $j$ .<sup>6</sup>

This is the formula that HUD uses to calculate dissimilarity index values. In most respects (including the use of tract-level data available through the Brown Longitudinal Tract Database), the methodology employed in this study exactly duplicates HUD’s methodology for calculating the index of dissimilarity.

The principle exception was the decision to use Census tract-level data to calculate dissimilarity index values through 2010. While HUD uses tract level data in 1990 and 2000, HUD uses block group-level data in 2010. The decision to use tract-level data in all years included in this study was motivated by the fact that the dissimilarity index is sensitive to the geographic base unit from which it is calculated. Concretely, use of smaller geographic units produces dissimilarity index values that tend to be higher than those calculated from larger geographic units.<sup>7</sup>

As a general rule, HUD considers the thresholds appearing in Table IV.18 to indicate low, moderate, and high levels of segregation:

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<sup>6</sup> Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.

<sup>7</sup> Wong, David S. “Spatial Decomposition of Segregation Indices: A Framework Toward Measuring Segregation at Multiple Levels.” *Geographical Analyses*, 35:3. The Ohio State University. July 2003. P. 179.

**Table IV.18**  
**Dissimilarity Index Values**

Measure	Values	Description
Dissimilarity Index	<40	Low Segregation
[range 0-100]	40-54	Moderate Segregation
	>55	High Segregation

### **Segregation Levels**

City of Lewisville has historically experienced low levels of segregation between white and non-white residents, and between white and black residents, as measured by the index of dissimilarity. As shown in Table IV.19, the dissimilarity index for non-white and white residents was 26.9 in 2010. The index between Hispanic and white was slightly higher at 37.8 percent, but still representing a low level of segregation. Lower degrees of segregation were observed between white residents and Black, Asian Pacific, or American Indian residents.

**Table IV.19**  
**AFFH Table 3 – Racial/Ethnic Dissimilarity Trends**

City of Lewisville, Texas  
2016 HUD AFFH Data

Racial/Ethnic Dissimilarity Index	Lewisville		
	1990	2000	2010
Non-White/White	17.41	20.04	26.87
Black/White	23.36	19.72	30.57
Hispanic/White	19.68	31.86	37.82
Asian or Pacific Islander/White	26.36	25.42	36.12

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Observed levels of segregation between white residents and other racial/ethnic groups grew between 1990 and 2010, without exception, although some dropped during 2000. The Hispanic/White dissimilarity index grew at the greatest rate between 1990 and 2010, from 19.68 to 37.82. As noted above, this is the only index that indicated a moderate level of segregation. While the non-white and white index increased from 17.41 in 1990 to 26.87 on 2010, this is still considered low segregation. Black and white segregation levels did not experience as much growth, according to the index between 1990 and 2010, growing from 23.36 to 30.57.

The distribution of city residents by race and ethnicity in 2010 is presented in Map IV.8. As shown, Hispanic residents tended to be concentrated in Census tracts on the west side of the city. The same pattern was true for foreign born or LEP residents, who had slightly more concentration on the west side of the city. These are shown in Maps IV.9 and IV.10.

The following table shows the dissimilarity index of the Dallas-Ft Worth-Arlington CBSA. The index shows much higher values of segregation across all ethnic categories for the region. Black residents experienced the highest levels of segregation in 1990, although those values have fallen somewhat as of 2010. By a small margin, white residents were the least segregated in 2010, followed by Asian or Pacific Islander and then Hispanic residents. These latter two ethnicities have risen somewhat in segregation since the 1990 Census.

**Table IV.20**  
**Racial/Ethnic Dissimilarity Trends – Regional Compare**  
 Dallas-Ft Worth-Arlington CBSA  
 Decennial Census

Racial/Ethnic Dissimilarity Index	Dallas-Ft Worth-Arlington CBSA		
	1990	2000	2010
Non-White/White	49.47	48.08	49.51
Black/White	63.00	59.30	59.85
Hispanic/White	48.71	52.27	53.14
Asian or Pacific Islander/White	42.08	44.31	50.11

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

### ***Housing Segregation and Patterns of Segregation over Time***

Renter-occupied housing units were largely concentrated in the southern part of the city. As discussed later in this section, there are no R/ECAPs in the City. Conversely, owner-occupied housing was concentrated on the western and northern ends of the city.

As discussed previously, no racial/ethnic groups had moderate or higher levels of segregation.

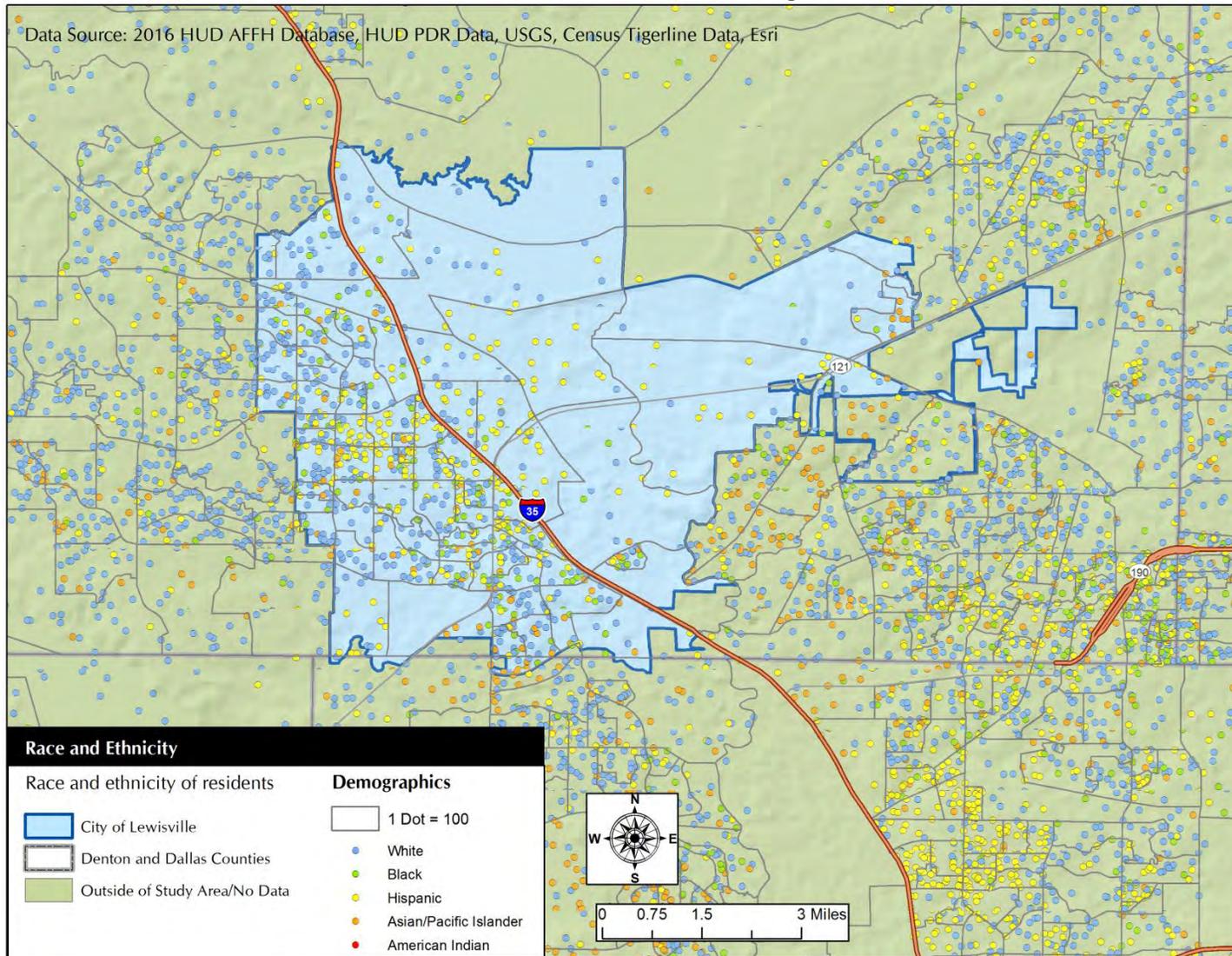
### **Region**

As seen in Table 3, the non-white/white dissimilarity index shows a moderate level of segregation in the region. This rate has remained relatively steady between 1990 and 2010, ending at 49.51 in 2010. The Black/White dissimilarity index has decreased from a high level of 63 in 1990 to a moderate level of 59.85 in 2010. Conversely, the Hispanic/White dissimilarity index has increased from 49.71 in 1990 to 53.14 in 2010. The Asian or Pacific Islander/White index has also increased in the jurisdiction from 1990 to 2010 from 42.31 to 50.11.

Areas with high levels of concentrations of Hispanic and Black households remained similar between 1990 and 2000, as seen in Maps 2 and 3. These areas were centralized in the Dallas and Fort Worth areas. By 2010, these concentrations shifted slightly. There was a higher concentration of Black households to the south side of the city centers. Hispanic concentrations were found dispersed within the Dallas and Fort Worth city areas.

The racial and ethnic segregation in Lewisville has remained consistently lower than the Dallas - Fort Worth – Arlington Metropolitan area. In fact, while segregation levels in the metropolitan area remain at moderate levels, the segregation indices in Lewisville have remained low. However, as the white/non-white segregation levels in the metropolitan area has remained constant over the past two decade, the rates in Lewisville have grown slightly, alerting the City of Lewisville to remain aware of potential for higher levels of segregation in the coming years.

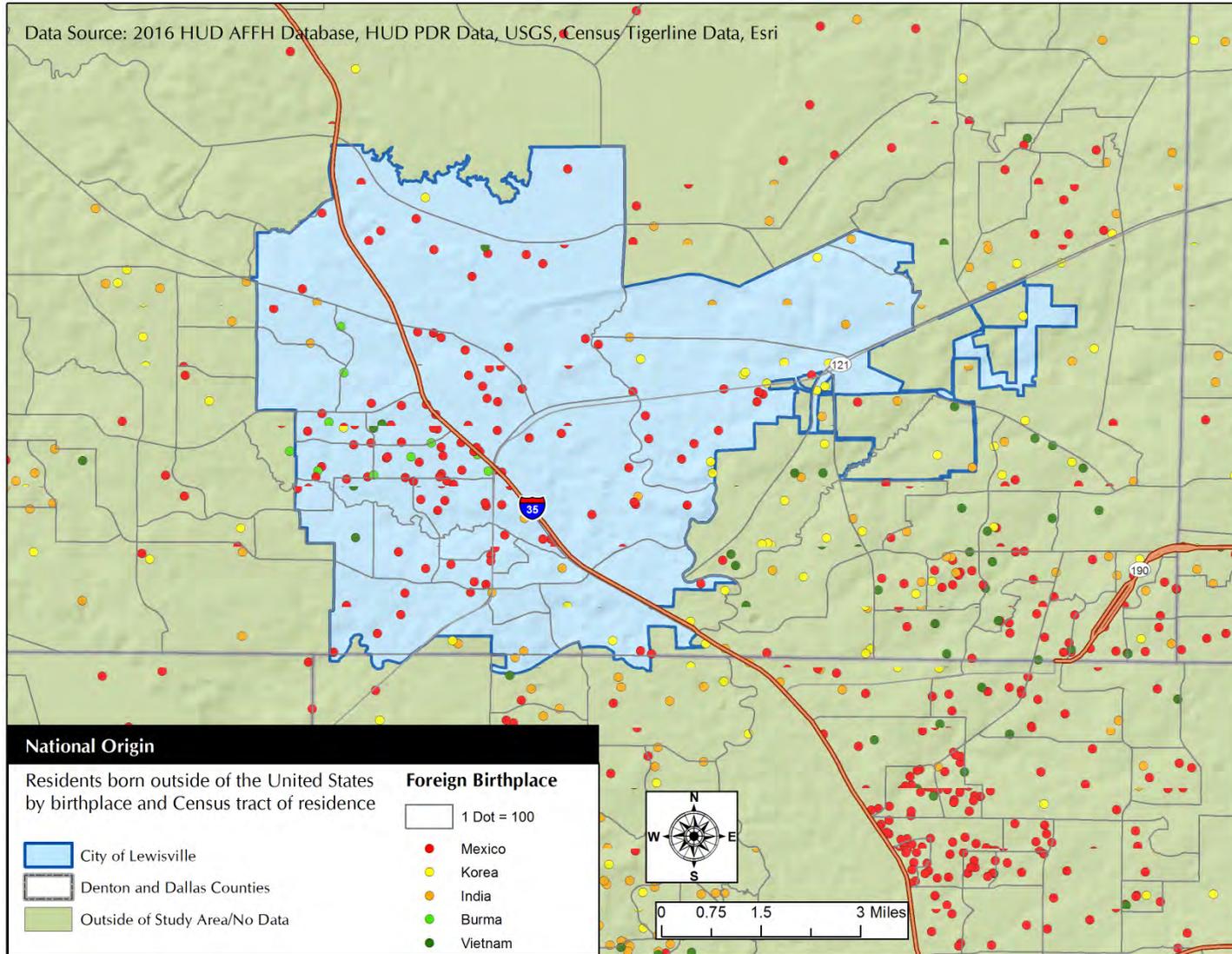
**Map IV.8**  
**AFFH Map 1 – Race and Ethnicity**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



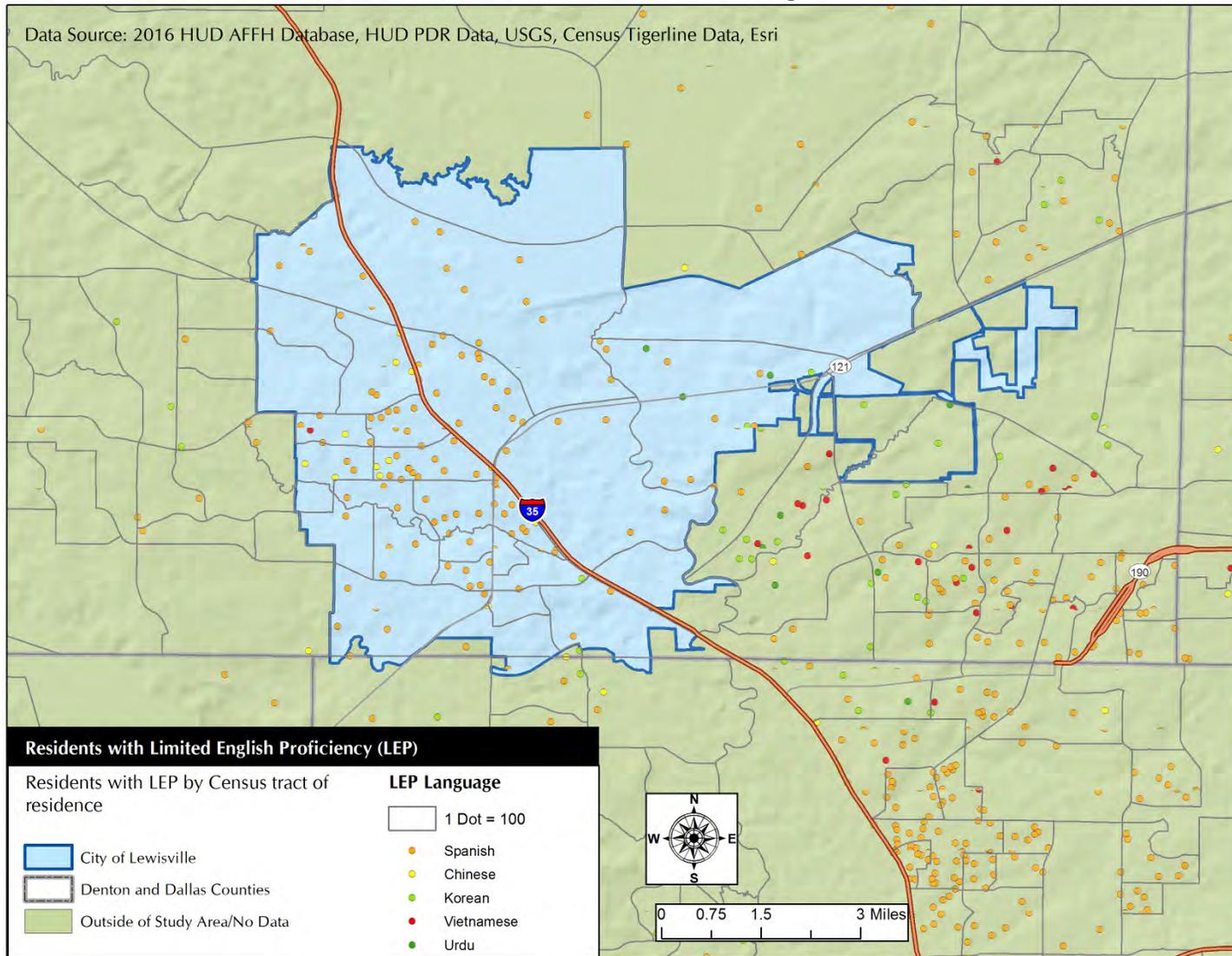
**Map IV.9**  
**AFFH Map 3 – National Origin**

Lewisville, Texas

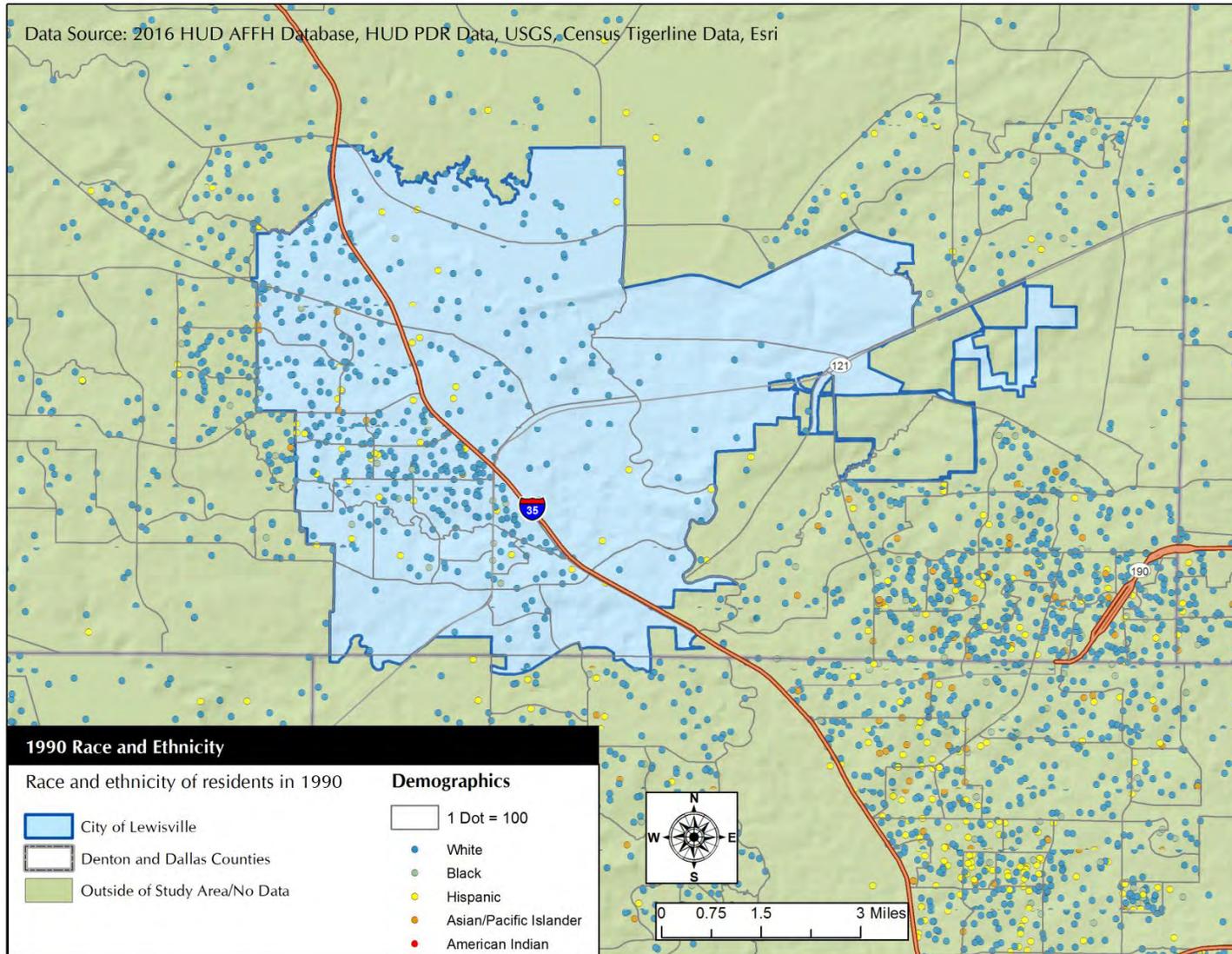
2016 HUD AFFH Database, USGS, Census Tigerline



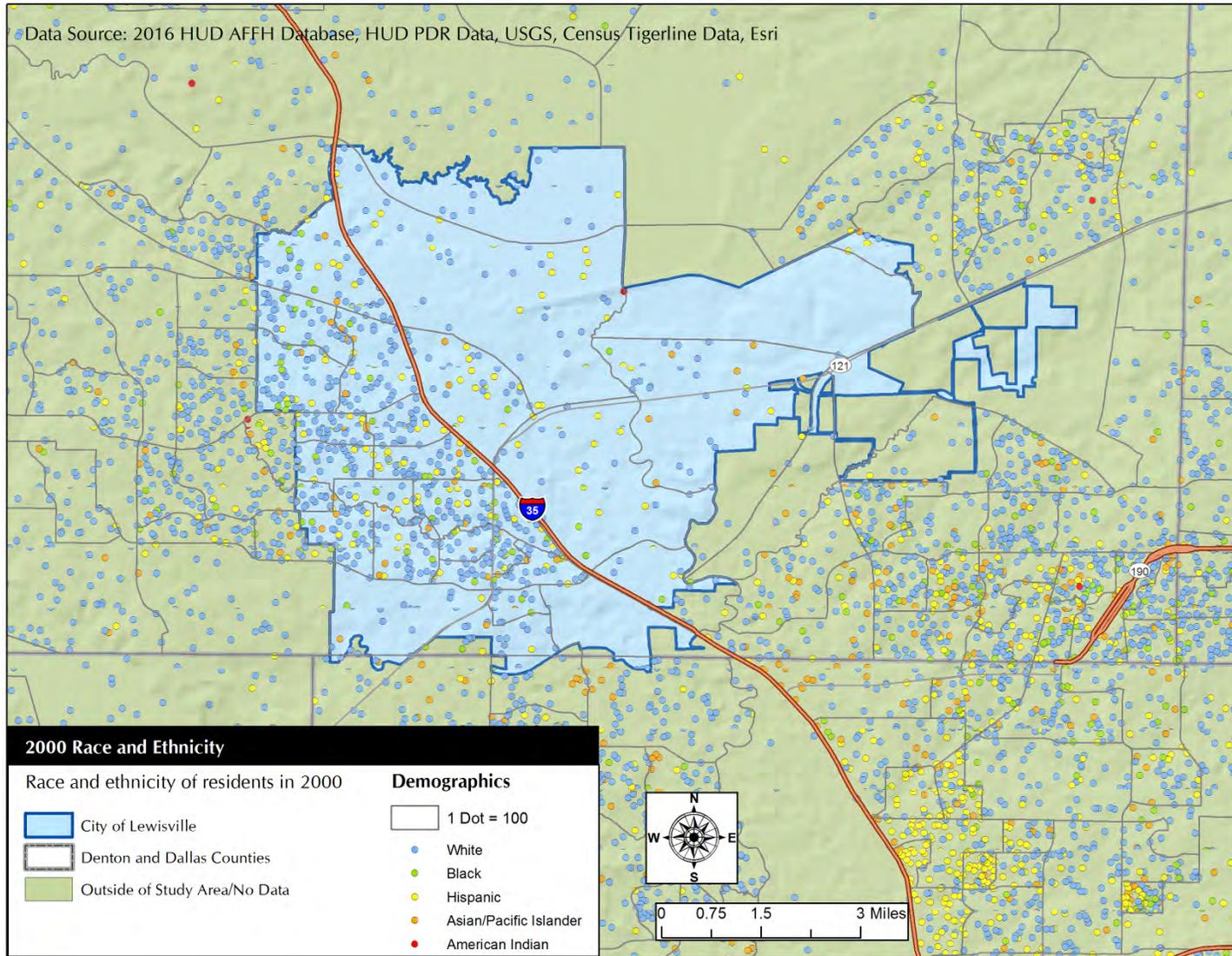
**Map IV.10**  
**AFFH Map 4 – Limited English Proficiency**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



**Map IV.11**  
**AFFH Map 2 – Race and Ethnicity 1990**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



**Map IV.12**  
**AFFH Map 2 – Race and Ethnicity 2000**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



## OTHER FACTORS CONTRIBUTING TO SEGREGATION/INTEGRATION

### *Home Mortgage Disclosure Act Data*

Since the late 1960s, 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 on the basis of any of those protected characteristics 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.<sup>8</sup> The analysis presented herein is from the HMDA data system.

Data collected under the HMDA provide a comprehensive portrait of home loan activity, including information pertaining to home purchase loans, home improvement loans, and refinancing.

Congress enacted the Home Mortgage Disclosure Act in 1975, permanently authorizing the law in 1988<sup>9</sup>. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;<sup>10</sup>

<sup>8</sup> *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>

<sup>9</sup> Prior to that year, Congress had to periodically reauthorize the law.

<sup>10</sup> 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.

3. The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated or refinanced at least one 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 Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are:

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 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.

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified 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;
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 loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans.

For the purposes of this analysis, these flagged originations will be termed predatory, or at least predatory in nature. Overall, the data contained within the HMDA reporting guidelines represent the best and most complete set of information on home loan applications. This report includes HMDA data from 2008 through 2015, the most recent year for which these data are available. These data allow us to analyze patterns in home lending, and discover whether and how much lending application patterns differ according to residents' genders, levels of income, and race or ethnicity.

The detailed HMDA data is presented in the Appendices, with the following presenting a key summary of this information. So, while owner occupied white applicants are denied at an average rate of 11.9 percent, minority owner occupied households are denied at a much higher rate. Hispanic applicants are denied at a rate of 23.0 percent. Black and Asian applicants are denied at an average rate of 15.5 percent and 15.1 percent, respectively. This is shown below in Table IV.21. If loans continue to be denied to minority households, then segregation in the jurisdiction may continue, especially in areas with high concentrations of owner-occupied housing.

**Table IV.21**  
**Denial Rates by Race/Ethnicity of Applicant**

City of Lewisville  
 2008–2015 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	Average
American Indian	12.5%	28.6%	69.2%	20.0%	50.0%	33.3%	.0%	11.1%	32.1%
Asian	25.3%	12.8%	19.2%	16.2%	20.0%	9.8%	12.0%	8.9%	15.1%
Black	14.9%	12.7%	11.5%	21.2%	14.3%	21.3%	14.7%	13.8%	15.5%
White	13.0%	10.6%	15.3%	12.8%	12.9%	11.1%	10.4%	9.5%	11.9%
Not Available	20.7%	12.3%	19.6%	28.1%	32.2%	24.2%	13.9%	13.1%	20.8%
Not Applicable	%	0.0%	0%	%	%	%	%	%	.0%
<b>Average</b>	<b>15.2%</b>	<b>11.2%</b>	<b>16.7%</b>	<b>15.7%</b>	<b>15.9%</b>	<b>12.9%</b>	<b>11.2%</b>	<b>10.1%</b>	<b>13.5%</b>
Non-Hispanic	13.5%	8.6%	13.1%	12.1%	11.2%	10.1%	9.3%	8.9%	10.8%
Hispanic	20.6%	23.8%	28.1%	26.7%	26.4%	23.8%	20.5%	14.9%	23.0%

HMDA data for applicant by race and income shows that denial rates among minority populations is particularly pronounced at lower income levels. For example, 66.7 percent of black applicants with incomes between \$15,000 and \$30,000 are denied, compared to 32.2 percent of white applicants.

**Table IV.22**  
**Denial Rates of Loans by Race/Ethnicity and Income of Applicant**

City of Lewisville  
 2008–2015 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	75.0%	27.3%	9.1%	22.2%	35.3%	%	32.1%
Asian	100.0%	34.1%	10.8%	13.1%	17.1%	14.8%	30.0%	15.1%
Black	100.0%	66.7%	25.4%	14.0%	10.0%	10.7%	20.0%	15.5%
White	66.7%	32.2%	18.2%	11.8%	8.1%	7.4%	13.4%	11.9%
Not Available	71.4%	63.6%	38.2%	15.3%	20.0%	12.6%	44.4%	20.8%
Not Applicable	%	%	%	%	%	%	.0%	.0%
<b>Average</b>	<b>72.7%</b>	<b>36.6%</b>	<b>19.1%</b>	<b>12.5%</b>	<b>10.8%</b>	<b>9.3%</b>	<b>22.7%</b>	<b>13.5%</b>
Non-Hispanic	76.5%	32.5%	14.2%	10.8%	9.0%	8.8%	12.7%	10.8%
Hispanic	66.7%	35.7%	27.7%	19.1%	13.6%	9.7%	46.2%	23.0%

### ***Fair Housing Complaints***

HUD maintains records of complaints that represent potential and actual violations of federal housing law. Over the 2008 through 2016 study period, the agency received a total of 28 complaints alleging discrimination in Lewisville. Some 15 of these complaints cited perceived discrimination based on disability, as shown in Table V.19a on the following page. In addition, between 2009 and 2016, some 12 fair housing complaints were received on the basis of race.

**Table IV.23a**  
**Fair Housing Complaints by Basis of Complaint**  
 City of Lewisville  
 2008-2016 HUD Data

<b>Basis</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>Total</b>
Disability	2	.	2	2	1	1	3	.	4	15
Race	6	2	1				2	1		12
Sex	1						1	1		3
Family Status	1			1						2
National Origin			1							1
Retaliation	1									1
<b>Total</b>	<b>11</b>	<b>2</b>	<b>4</b>	<b>3</b>	<b>1</b>	<b>1</b>	<b>6</b>	<b>2</b>	<b>4</b>	<b>34</b>
Total Complaints	8	2	3	3	1	1	4	2	4	28

Those who file fair housing complaints with the Department of Housing and Urban Development may include more than one discriminatory action, or *issue*, in those complaints. Fair housing complaints from the City of Lewisville cited 48 issues total, with the most common being discriminatory terms, conditions, privileges, or services and facilities in first place, with discrimination in terms, conditions, privileges relating to rental and failure to make reasonable accommodation second-most, as shown in Table IV.23b below.

**Table IV.23b**  
**Fair Housing Complaints by Issue of Complaint**  
 City of Lewisville  
 2008-2016 HUD Data

<b>Basis</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>Total</b>
Discriminatory terms, conditions, privileges, or services and facilities	4	1	2	2	0	1	4	0	3	17
Discrimination in terms/conditions/privileges relating to rental	3	1	0	1	1	0	0	1	0	7
Failure to make reasonable accommodation	0	0	0	1	1	1	1	0	3	7
Discriminatory refusal to rent	3	1	0	1	0	0	0	0	1	6
Discriminatory acts under Section 818 (coercion, Etc.)	2	0	0	0	0	0	1	1	1	5
Discriminatory financing (includes real estate transactions)	1	0	1	0	0	0	0	0	0	2
Discriminatory refusal to rent and negotiate for rental	0	1	0	0	0	0	0	0	1	2
Discriminatory refusal to negotiate for rental	0	0	0	0	0	0	1	0	0	1
False denial or representation of availability - rental	0	0	0	0	0	0	0	0	1	1
<b>Total Issues</b>	<b>13</b>	<b>4</b>	<b>3</b>	<b>5</b>	<b>2</b>	<b>2</b>	<b>7</b>	<b>2</b>	<b>10</b>	<b>48</b>
Total Complaints	8	2	3	3	1	1	4	2	4	28

### **Additional Information**

Public input comments indicated that a lack of available housing options may contribute to the level of segregation in the community. Comments also suggested that the placement of affordable housing units and zoning policies may impact the lack of integration in the City. Zoning for multi-family housing is limited to certain areas of the city, limiting access to parts of the City for certain populations.

## RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents and these residents living in poverty. Formally, an area is designated an R/ECAP if two conditions are satisfied: first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50 percent of the Census tract population. Second, the poverty rate in that Census must exceed a certain threshold. That threshold is set at either 40 percent or three times the overall poverty rate, whichever is lower.

There were no Census tracts in Lewisville that met the definition of an R/ECAP in 2010.

**Table IV. 24**  
**HUD AFFH Table 4 – R/ECAP Demographics**  
 Lewisville, Texas  
 2016 HUD AFFH Database

		Lewisville	
R/ECAP Race/Ethnicity		#	%
Total Population in R/ECAPs		0	-
White, Non-Hispanic		0	
Black, Non-Hispanic		0	
Hispanic		0	
Asian or Pacific Islander, Non-Hispanic		0	
Native American, Non-Hispanic		0	
Other, Non-Hispanic		0	0
<b>R/ECAP Family Type</b>			
Total Families in R/ECAPs		0	-
Families with children		0	
<b>R/ECAP National Origin</b>		<b>Country</b>	
Total Population in R/ECAPs		0	-
#1 country of origin		0	.00
#2 country of origin		0	.00
#3 country of origin		0	.00
#4 country of origin		0	.00
#5 country of origin		0	.00
#6 country of origin		0	.00
#7 country of origin		0	.00
#8 country of origin		0	.00
#9 country of origin		0	.00
#10 country of origin		0	.00

Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

### ***R/ECAPs Over Time***

Since 1990, the City of Lewisville has not had any R/ECAPs.

### **Region**

While there are not R/ECAPs in Lewisville, there are a number within the Dallas-Fort Worth- Arlington region. There is a total regional population of 261,237 in R/ECAPs. Some 37.06 percent of these persons are Black, non-Hispanic, and 47.11 percent are Hispanic. This is in contrast to the 14.65 percent of the total regional population that is Black, non-Hispanic, and the 27.37 percent that is Hispanic. The regional R/ECAPs are

primarily located within or adjacent to the cities of Dallas, Fort Worth, and Arlington. The largest population of foreign born households in R/ECAPs is those with a National Origin of Mexico, accounting for 20.48 percent, compared to the 9.26 percent of the regional population as a whole. In addition, families with children accounted for 56.66 percent of the R/ECAP population in the region, compared to 51.21 percent of the region as a whole.

As mentioned in the previous section, however, the amount of white/non-white segregation in Lewisville is growing. As there are no R/ECAPs in Lewisville at this time, the City will continue efforts to keep neighborhoods integrated.

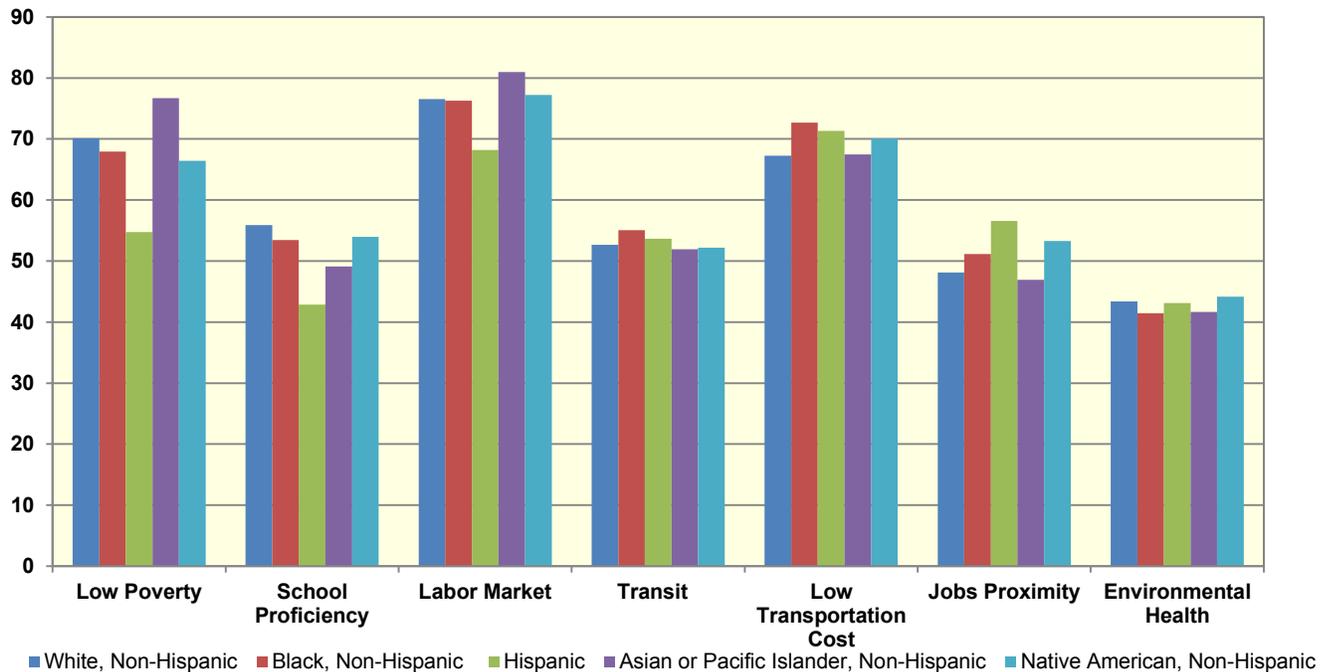
## C. DISPARITIES IN ACCESS TO OPPORTUNITY

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The following section will describe the following opportunity indicator indices: Low Poverty; School Proficiency; Labor Market Engagement; Jobs Proximity; Low Transportation Costs; Transit Trips Index; and Environmental Health by race/ethnicity and households below the poverty line. A higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins).

All the indices are presented in Diagram IV.6. As noted therein, four of the indices have little, if any, substantive differences by racial or ethnic classification, such as transit, transportation costs, jobs proximity, and environmental health. However, low poverty, school proficiency and the labor market all have substantive differences, especially between Hispanics and whites.

**Diagram IV.6**  
**Access to Opportunity by Race and Ethnicity**  
 City of Lewisville, Texas  
 2010 Census, 2016 HUD AFFH Database



## EDUCATIONAL OPPORTUNITIES

The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where this information is available) of individuals sharing a protected characteristic or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams.

As measured by the school proficiency index, urban block groups with the greatest proximity to high-performing elementary schools tend to be clustered in the north and south of the city. As shown in Map IV.13, the northern area has a higher concentration of white residents.

This relationship is further illustrated in Table IV.25, which shows that the school proficiency index for Hispanic residents is, at 42.8, below measures of school proficiency for other residents. White non-Hispanic measures were 55.9.

The degree to which access to high-performing schools differed by birthplace (i.e., within or outside of the United States) depended on residents' countries of birth. Mexican-born residents within the city limits tended to live in areas with relatively lower school proficiency index values, as shown in Map IV.14.

Most block groups in central areas of the city included 0 to 500 families with children, and within that range school proficiency index values did not differ markedly, as shown in Map IV.15.

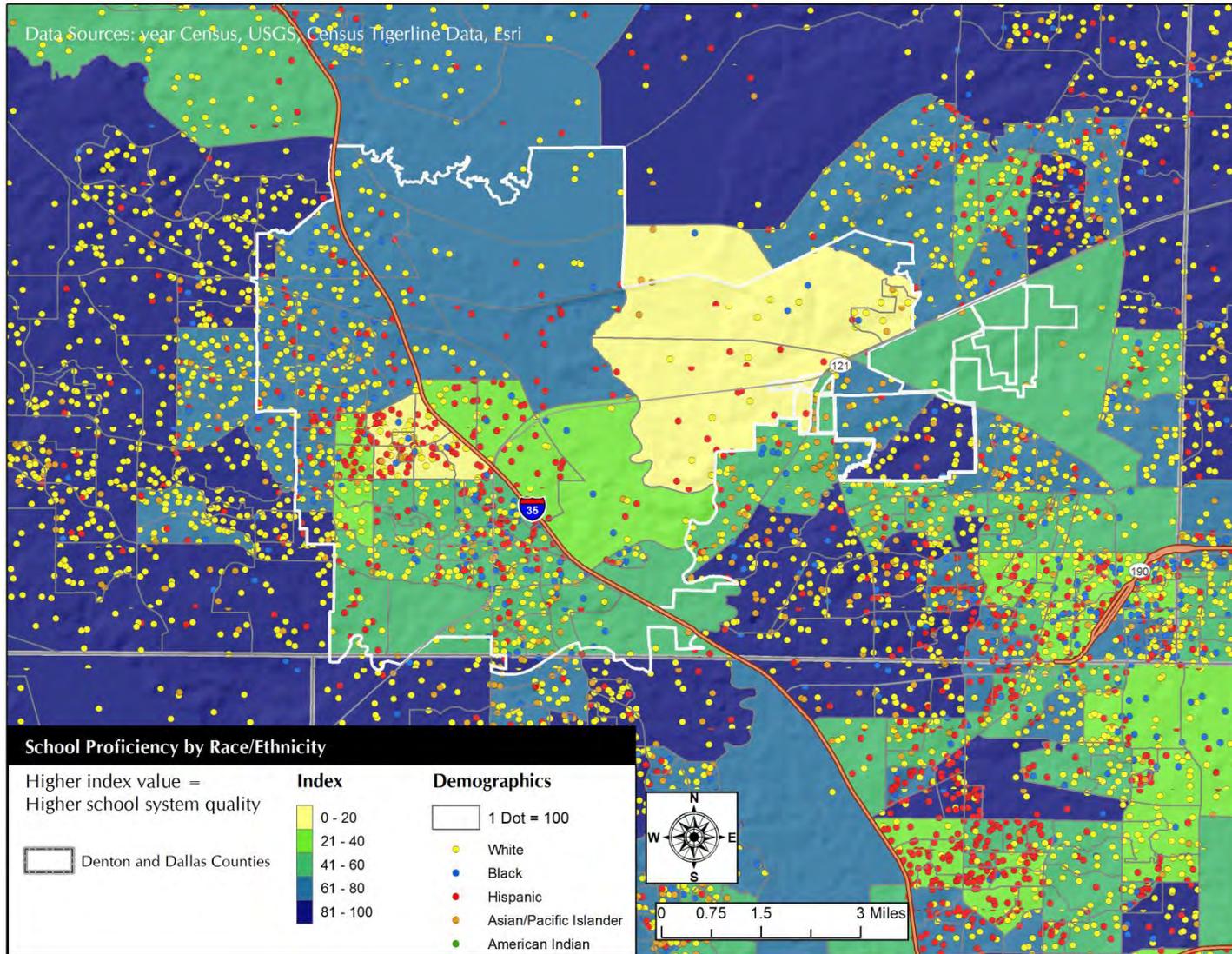
**Table IV.25**  
**HUD AFFH Table 12 – Opportunity Indicators by Race/Ethnicity**  
 Lewisville, Texas  
 2016 HUD AFFH Database

<b>Lewisville</b>	<b>Low Poverty Index</b>	<b>School Proficiency Index</b>	<b>Labor Market Index</b>	<b>Transit Index</b>	<b>Low Transportation Cost Index</b>	<b>Jobs Proximity Index</b>	<b>Environmental Health Index</b>
<b>Total Population</b>							
White, Non-Hispanic	70.13	55.90	76.56	52.67	67.24	48.13	43.40
Black, Non-Hispanic	67.94	53.43	76.30	55.07	72.69	51.17	41.45
Hispanic	54.75	42.84	68.21	53.65	71.32	56.57	43.12
Asian or Pacific Islander, Non-Hispanic	76.69	49.10	80.98	51.94	67.44	46.93	41.65
Native American, Non-Hispanic	66.43	53.94	77.24	52.19	70.09	53.30	44.16
<b>Population below federal poverty line</b>							
White, Non-Hispanic	64.53	52.71	75.66	55.80	72.23	48.33	42.18
Black, Non-Hispanic	43.60	46.46	66.77	55.53	75.68	55.19	40.53
Hispanic	48.23	45.13	63.72	52.86	74.27	63.57	44.77
Asian or Pacific Islander, Non-Hispanic	62.97	46.94	73.05	59.09	76.26	48.00	41.52
Native American, Non-Hispanic	42.62	61.26	65.45	56.76	78.05	68.66	44.00

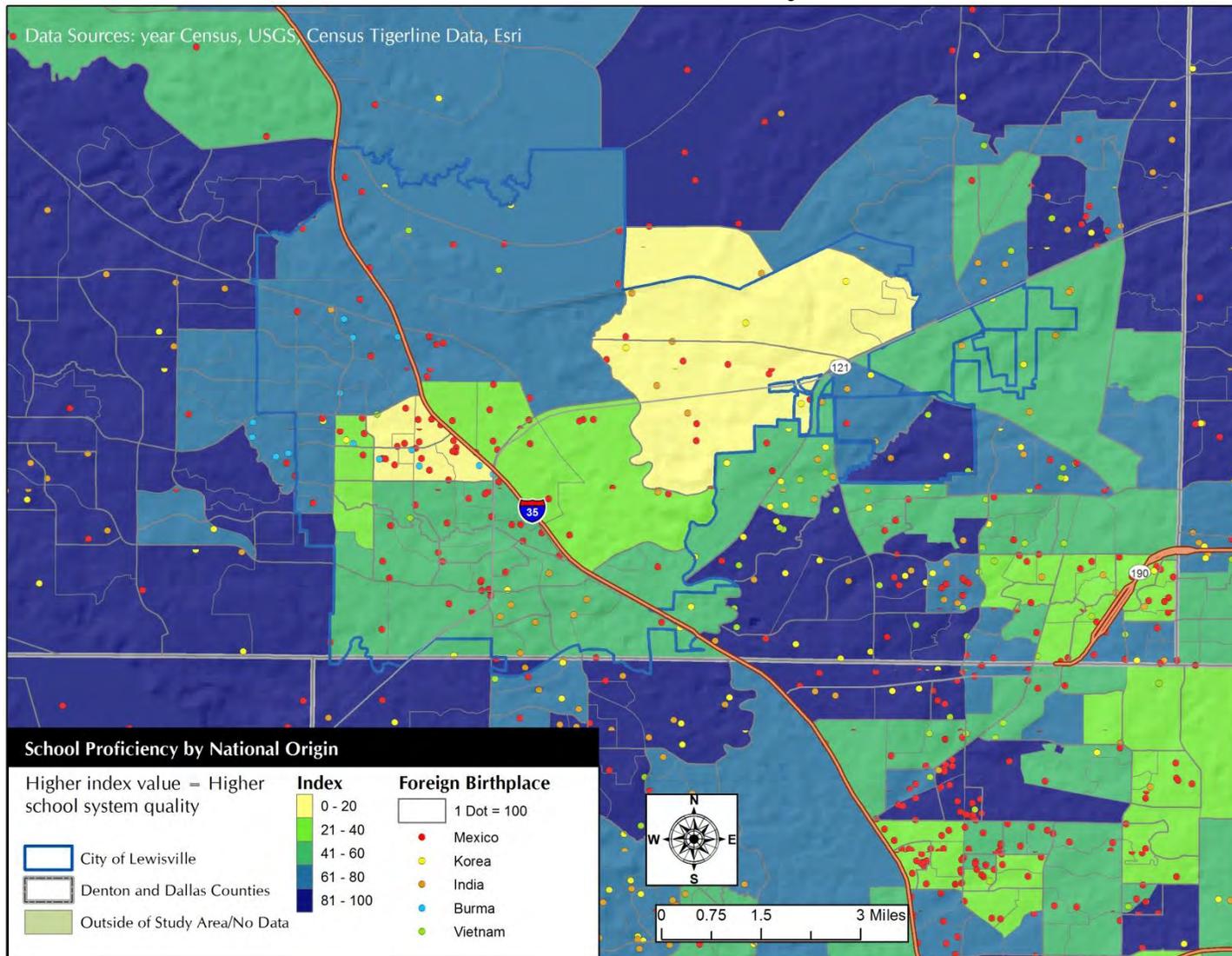
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Note 2: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

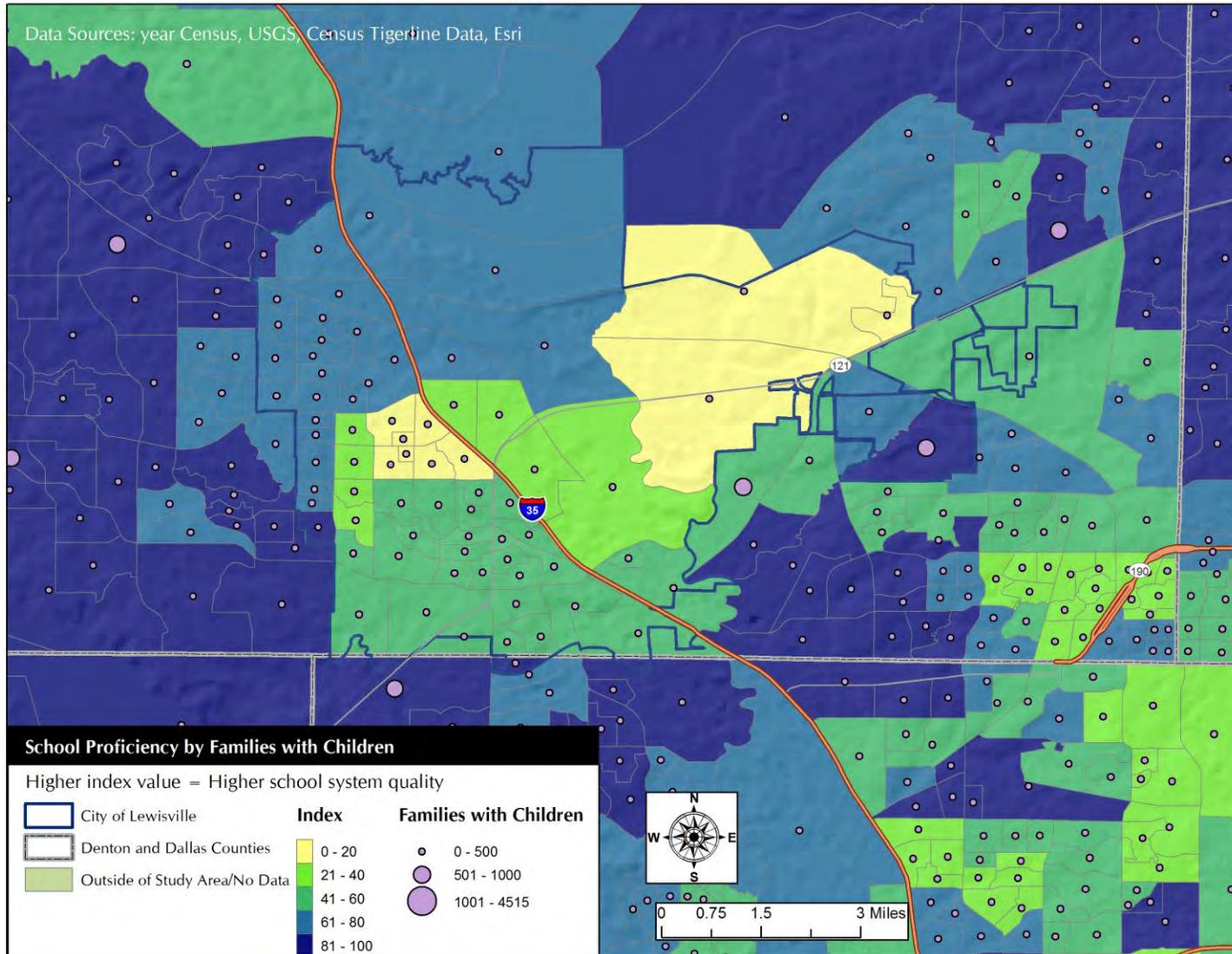
**Map IV.13**  
**AFFH Map 9 – School Proficiency by Race**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



**Map IV.14**  
**AFFH Map 9 – School Proficiency by National Origin**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



**Map IV.15**  
**AFFH Map 9 – School Proficiency by Families with Children**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



### ***Residency Patterns and School Proficiency***

Urban block groups with the greatest proximity to high-performing elementary schools tend to be clustered in areas with a relatively high concentration of white residents and comparatively low concentrations of black residents. In areas with higher concentrations of Hispanic residents, school proficiency index values tended to be lower.

Mexican-born residents within the city limits tended to live in areas with relatively lower school proficiency index values, as shown in Map IV.14.

There was no observed difference with the relationship between the number of families in a block group and access to high performing schools.

### ***School Related Policies***

The Lewisville Independent School District enrolls students based on residential locations within the city. This may limit access to high performing schools to residents living in other areas of the City.

### **Region**

Mirroring the trends with the Low Poverty index, Black, Non-Hispanic and Hispanic households are markedly lower school proficiency index levels than white households. At 40.83 for Black households and 42.04 for Hispanic households, this was close to 20 index points below the 60.25 for white households in the region. However, the School Proficiency index within Lewisville tended to have less marked distinction in racial disparities for school proficiency.

Geographically in the region, lower rating schools were located in areas in and around the cities. Higher rated schools tended to be located outside the city centers. As seen in Map 9, areas with higher concentrations of Black and Hispanic populations tended to have lower school proficiency ratings, as suggested by Table 12. Those households with Mexican national origin also seemed to concentrate in areas with lower school proficiency ratings, while households with children did not.

## **EMPLOYMENT**

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The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity. The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood.

The job proximity index suggests that job opportunities in the city were generally concentrated east of I-35 in the City of Lewisville. As shown in Map IV.16 and Table IV.25, physical location had little impact on access to employment opportunities by race and ethnicity, with Hispanics

showing slightly better access. The same was true of the city's largest foreign-born populations and families with children.

However, measures of labor market engagement did reveal a higher level of differences between residents of different races/ethnicities. The labor market engagement index is a combination of three factors: the unemployment rate, the labor force participation rate, and the share of the population that has attained a bachelor's degree or higher. As shown in Table IV.25, labor market engagement scores were highest among the city's white, black and Native American residents (greater than 76 in all three cases). The labor market engagement score was lowest among the city's Hispanic residents (68.21).

Residents born outside of the United States generally lived in Census tracts with relatively lower labor market engagement scores, as shown in Map IV.20. As noted previously, most block groups throughout the city included 0 to 500 families with children, and there was little geographic variation in labor market engagement by the number of families with children.

### ***Residency and Job Access***

As noted previously, the job proximity index suggests that job opportunities in the city, like the population as a whole, were generally concentrated on the east side of the City of Lewisville. Accordingly, residents of those areas had greater access to employment opportunities than residents in the surrounding city. As shown in Map IV.21 and Table IV.25, physical location had little impact on access to employment opportunities by race and ethnicity.

### ***Groups with Little Job Access***

As discussed above, physical location had little impact on access to employment opportunities by race and ethnicity or national origin. In addition, family status did not seem to impact access to employment opportunities.

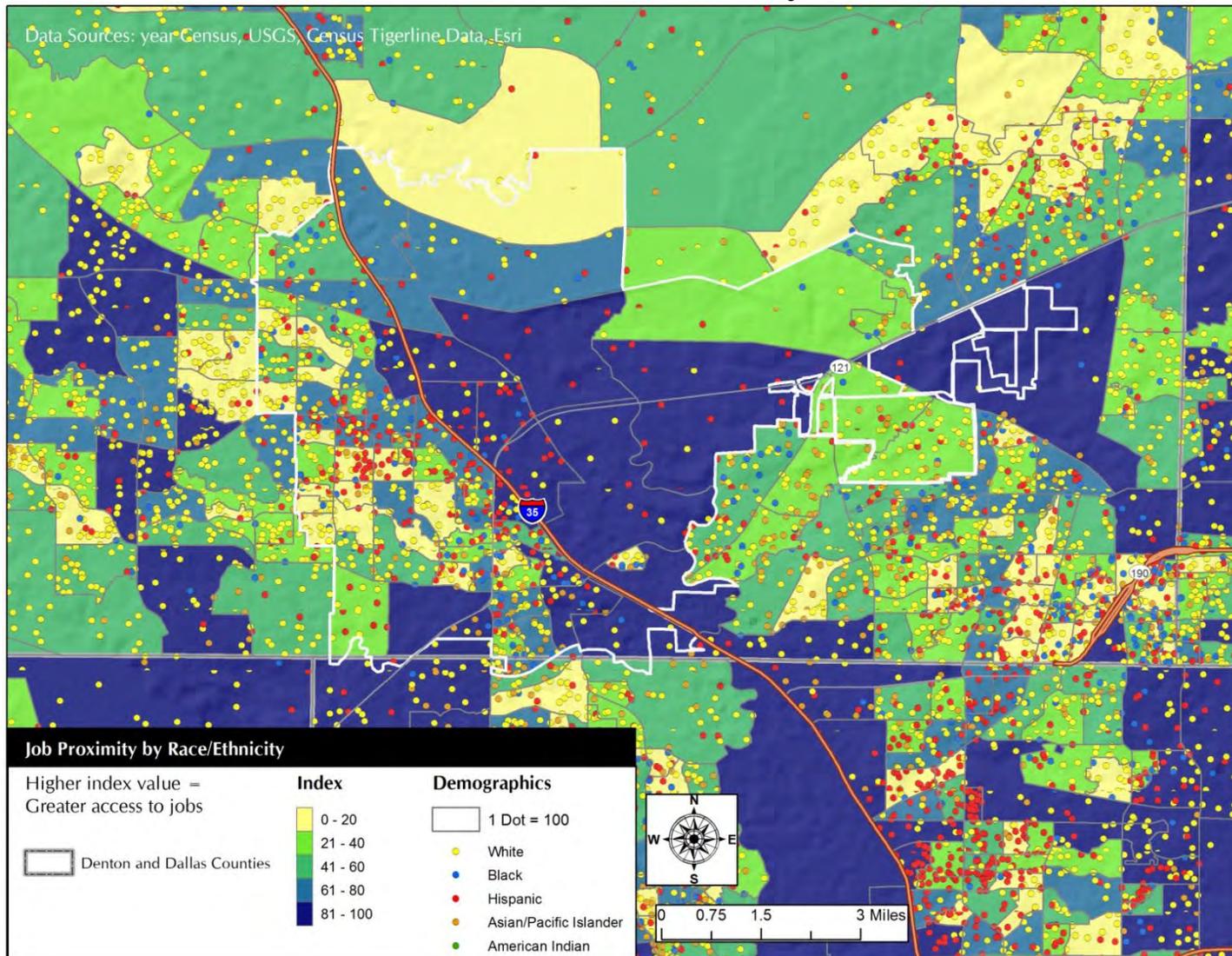
### **Region**

Black and Hispanic populations had at least 20 points less on the Labor Market Index than white households in the region. White households had an index of 67.57, while Black households were at 47.59 and Hispanic households were at 45.75. Asian or Pacific Islander households fared better in the region at 74.36. The City of Lewisville's labor market index showed a much smaller difference for minority population than the region as a whole. Black and Hispanic households fared much better in the labor market in Lewisville than in the greater region, with index rates more than twenty points higher than their regional counterparts. Higher rated labor market areas were located outside of the major city areas, primarily to the north and west. These also tended to be areas with less concentration of minority populations, as well as areas without R/ECAPs. Mexican born populations tended to be concentrated in areas with lower labor market indices, while other foreign born groups were in areas with higher indices.

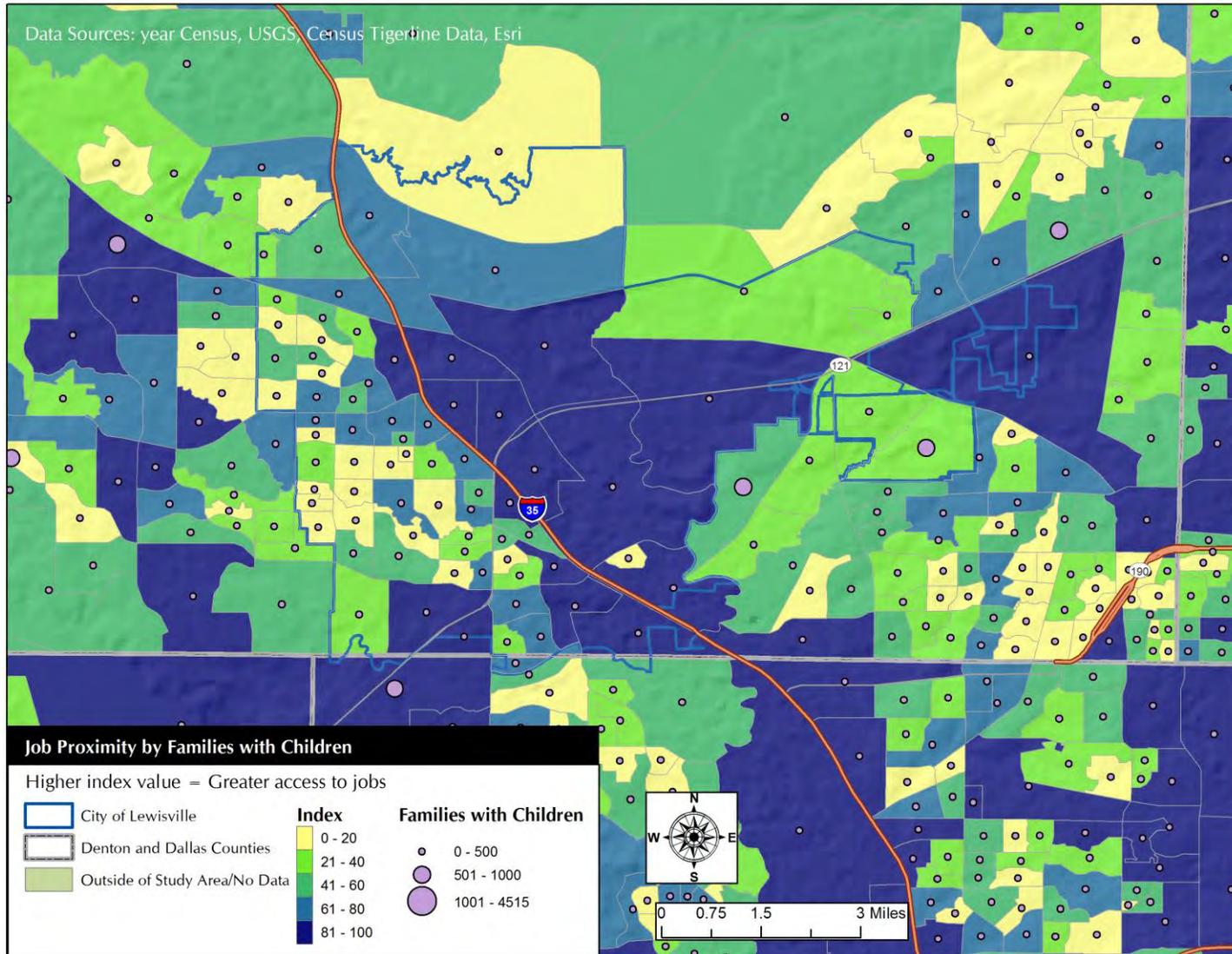
There was little variation among race and ethnicity for job proximity in the region, reflecting trend in Lewisville as well. Black, non-Hispanic households had the lowest index at 44.94, compared to 47.47 for Hispanic households and 49.59 for white, non-Hispanic households.

High Jobs Proximity indices were spread throughout the region, both in the central city areas as well as outside. As such, racial/ethnic groups, national origin, and family status appeared to have little impact on jobs proximity.

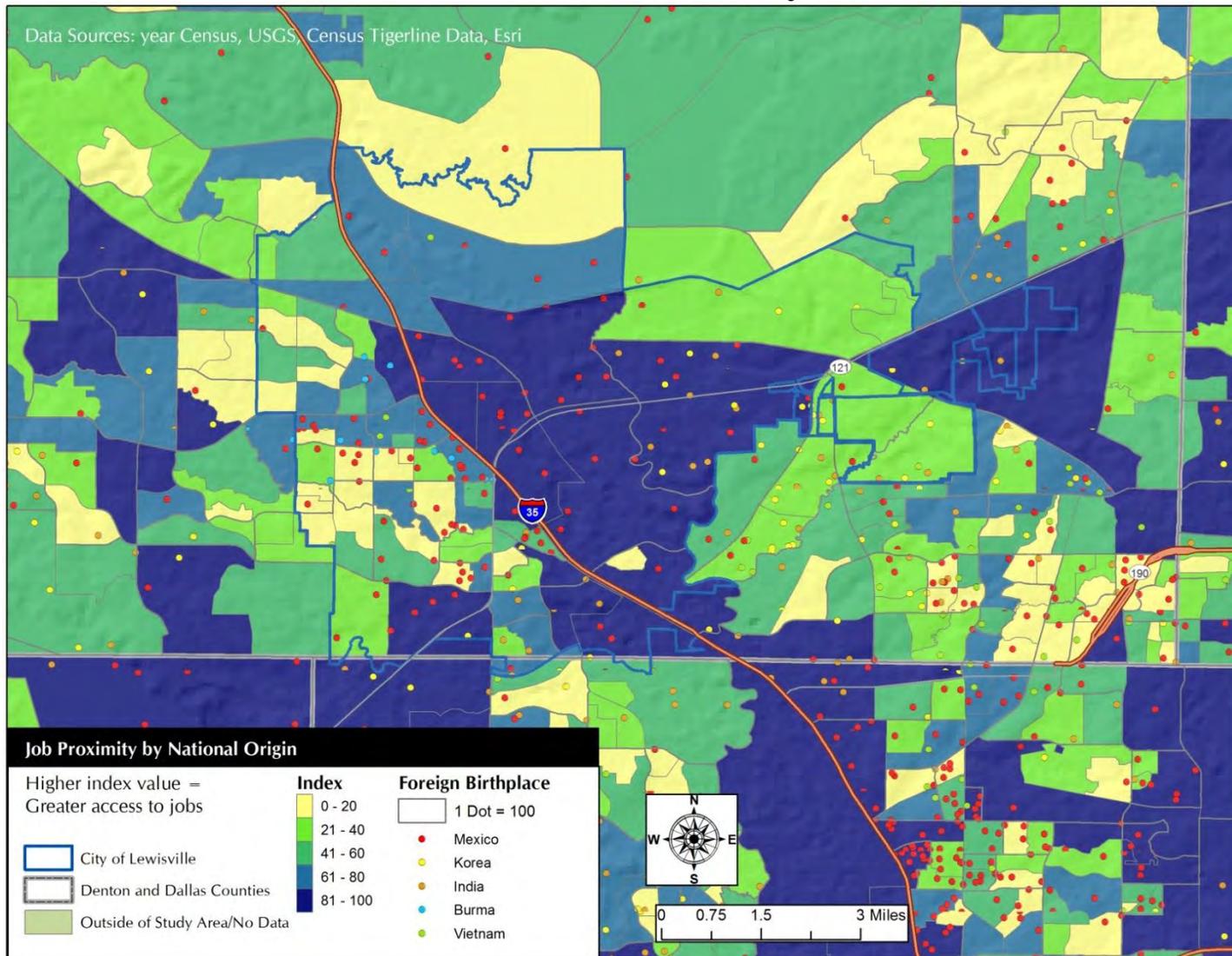
**Map IV.16**  
**AFFH Map 10 – Job Proximity by Race**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



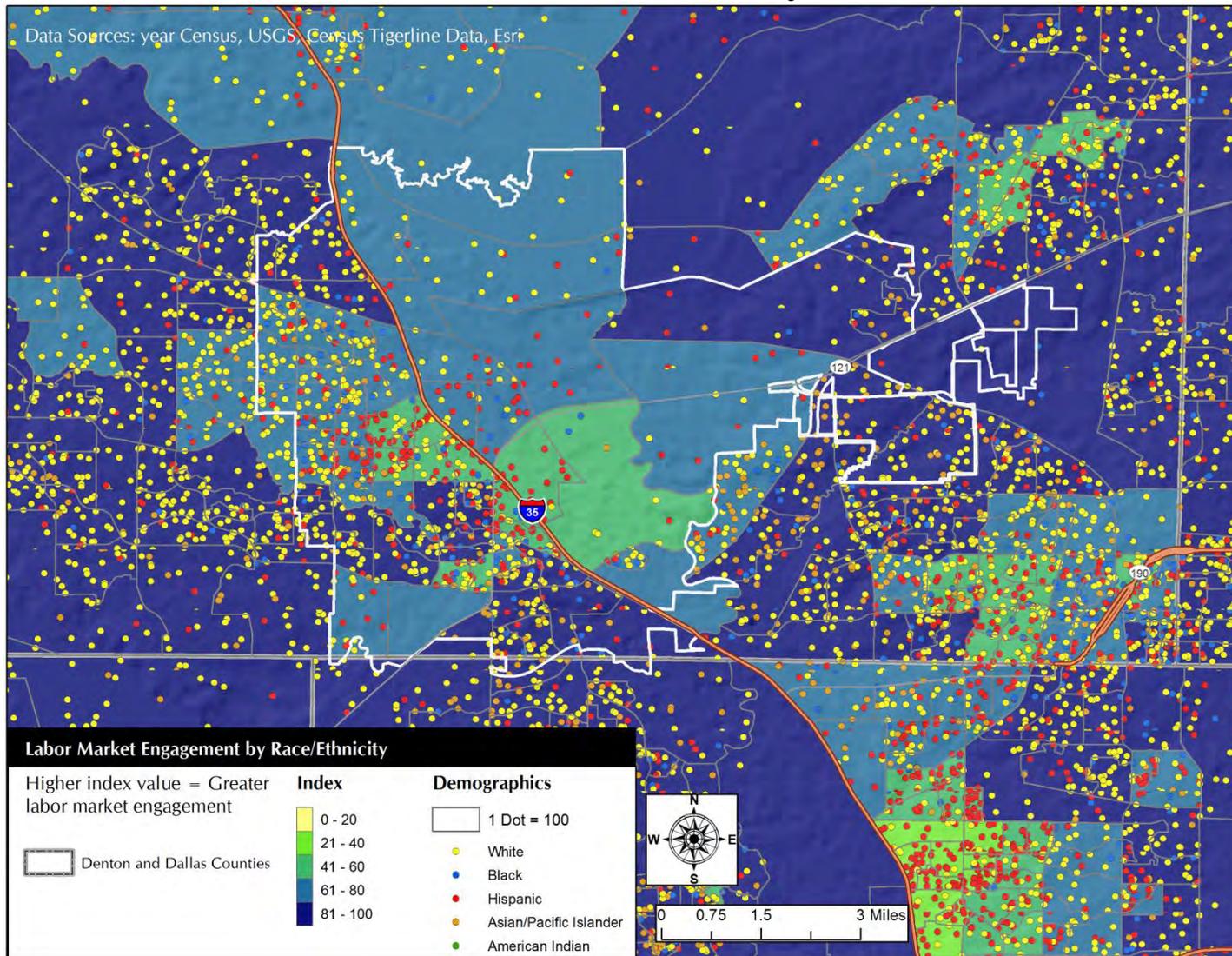
**Map IV.17**  
**AFFH Map 10 – Job Proximity by National Origin**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



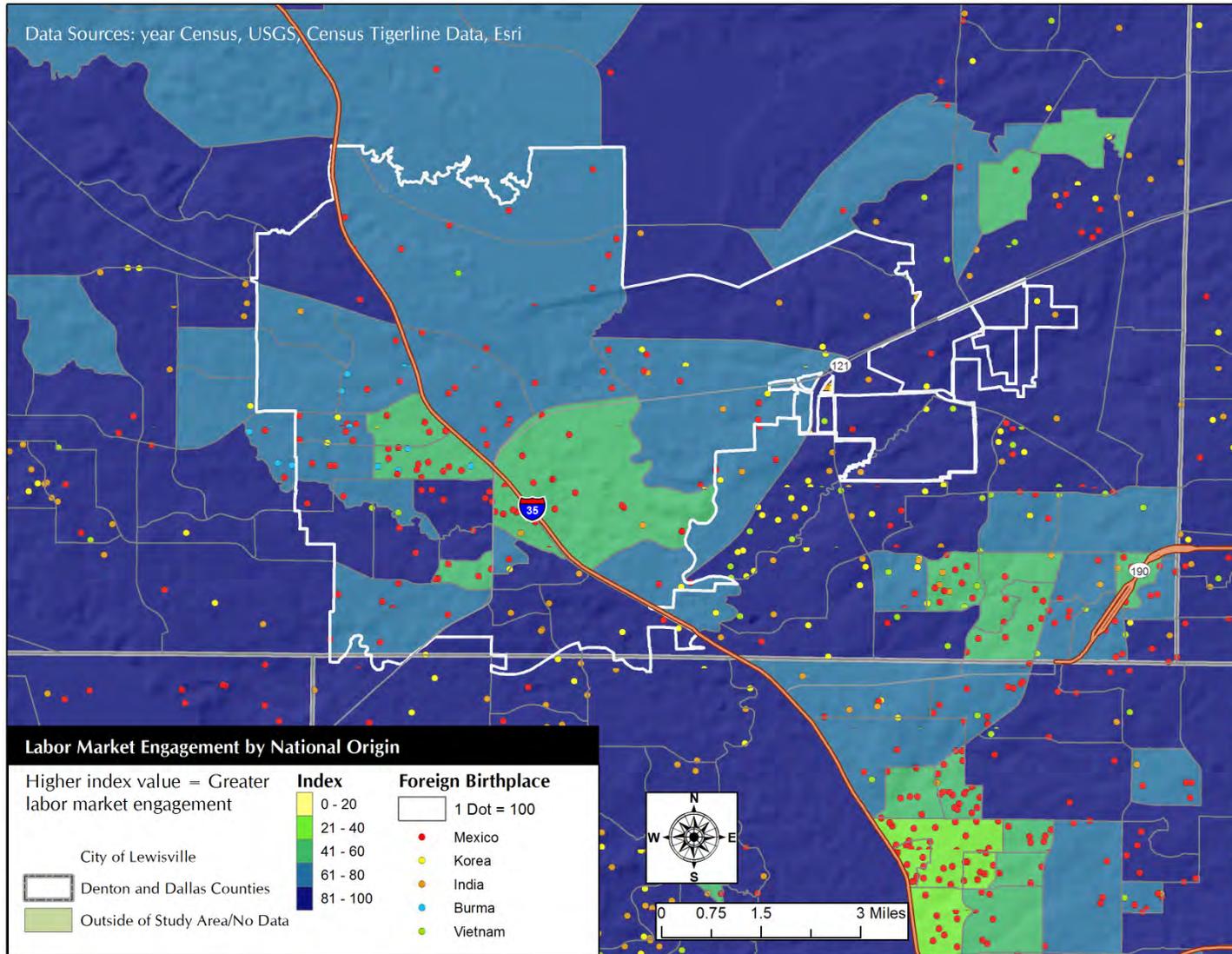
**Map IV.18**  
**AFFH Map 10 – Job Proximity by Families with Children**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



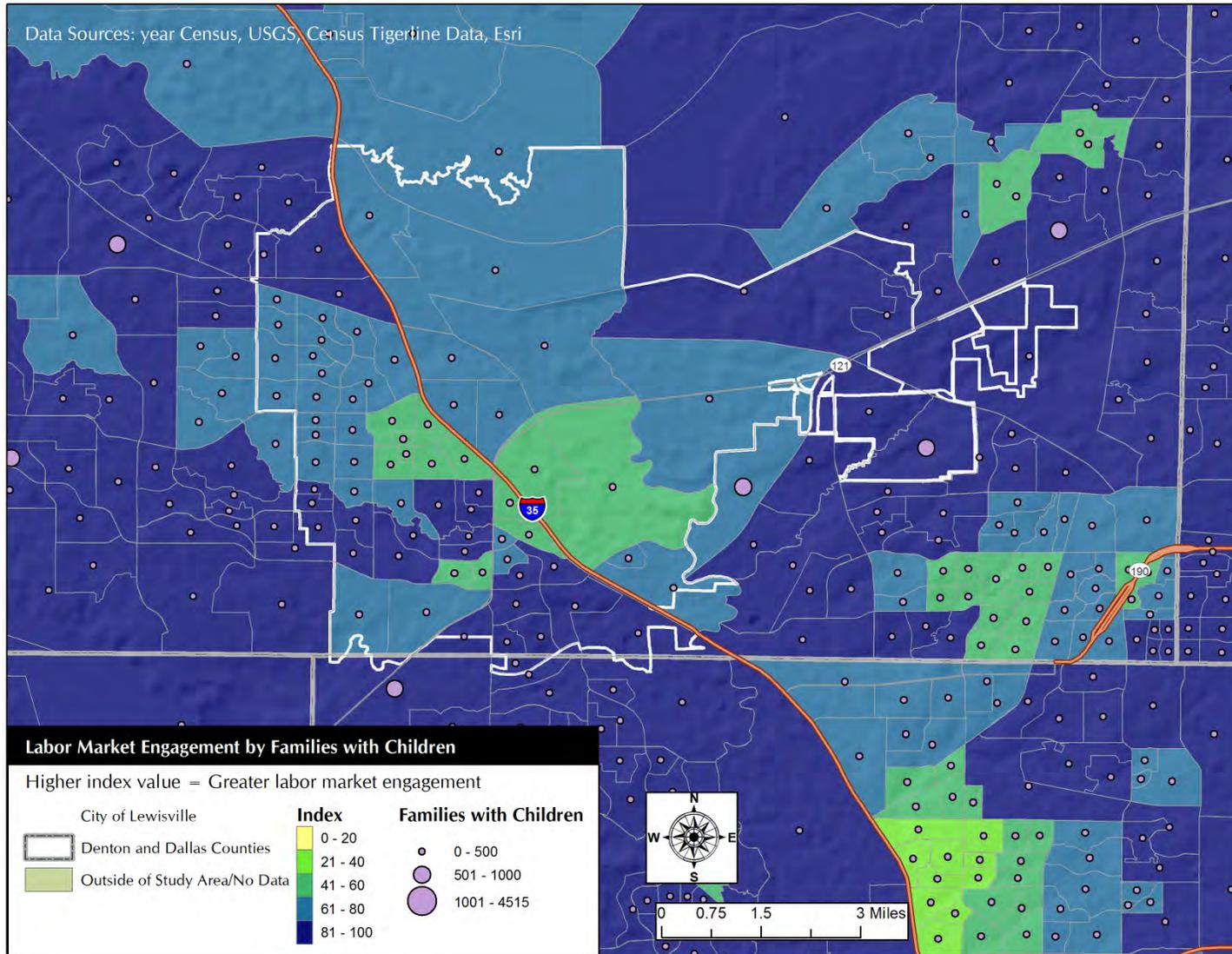
**Map IV.19**  
**AFFH Map 11 – Labor Market Engagement by Race/Ethnicity**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



**Map IV.20**  
**AFFH Map 11 – Labor Market by National Origin**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



**Map IV.21**  
**AFFH Map 11 – Labor Market by Families with Children**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



## TRANSPORTATION

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The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation.

Based on the Transportation Cost and Transit Trips indices, access to transportation is greatest for residents who in the central areas of the city, particularly those adjacent to I-35. Residents to the center of the city center were more likely to use public transit than residents, in outlying areas of the city.

Similarly, transportation costs were observed to be lower within the central area of the city and adjacent to I-35, according to the Transportation Cost Index<sup>11</sup>. By contrast, transportation costs were relatively high in outer areas of the city.

### ***Groups Lacking Affordable Transit from Home to Work***

Transportation use was fairly equally distributed among the various racial and ethnic groups represented in Table IV.25. Geographic maps comparing transit trip index values to the distribution of residents by national origin and family size likewise did not reveal major discrepancies in access to public transit or likelihood of public transit use by foreign birthplace or presence of children in the home.

Similarly, there were no substantial differences in transportation costs by race or ethnicity revealed in a geographical analysis of those costs (Map IV.25) or citywide transportation cost figures reported in Table IV.25. Geographic analysis of transportation likewise did not reveal a marked difference in transportation costs by foreign birthplace (Map IV.26) or for families with children (Map IV.27).

### ***Ability to Access Transportation Systems***

The availability of transit is concentrated within the center of the city. As such, these areas also have higher concentrations of racial/ethnic minorities. This enables the availability of transportation to these protected classes.

### **Region**

Black, Hispanic, and Asian or Pacific Islander households all rated similarly in the transportation index, around 48. White and Native American households rated lower at 42.14 and 43.05, respectively. The Transit indices in Lewisville fared better, overall than the regional averages, with all racial and ethnic groups rating within two points of 53. As expected, higher transit trip indices were found in and around the cities of Dallas, Fort Worth, and Arlington. These areas also tended to be areas with higher concentrations of Black or Hispanic households, as seen in Map 12.

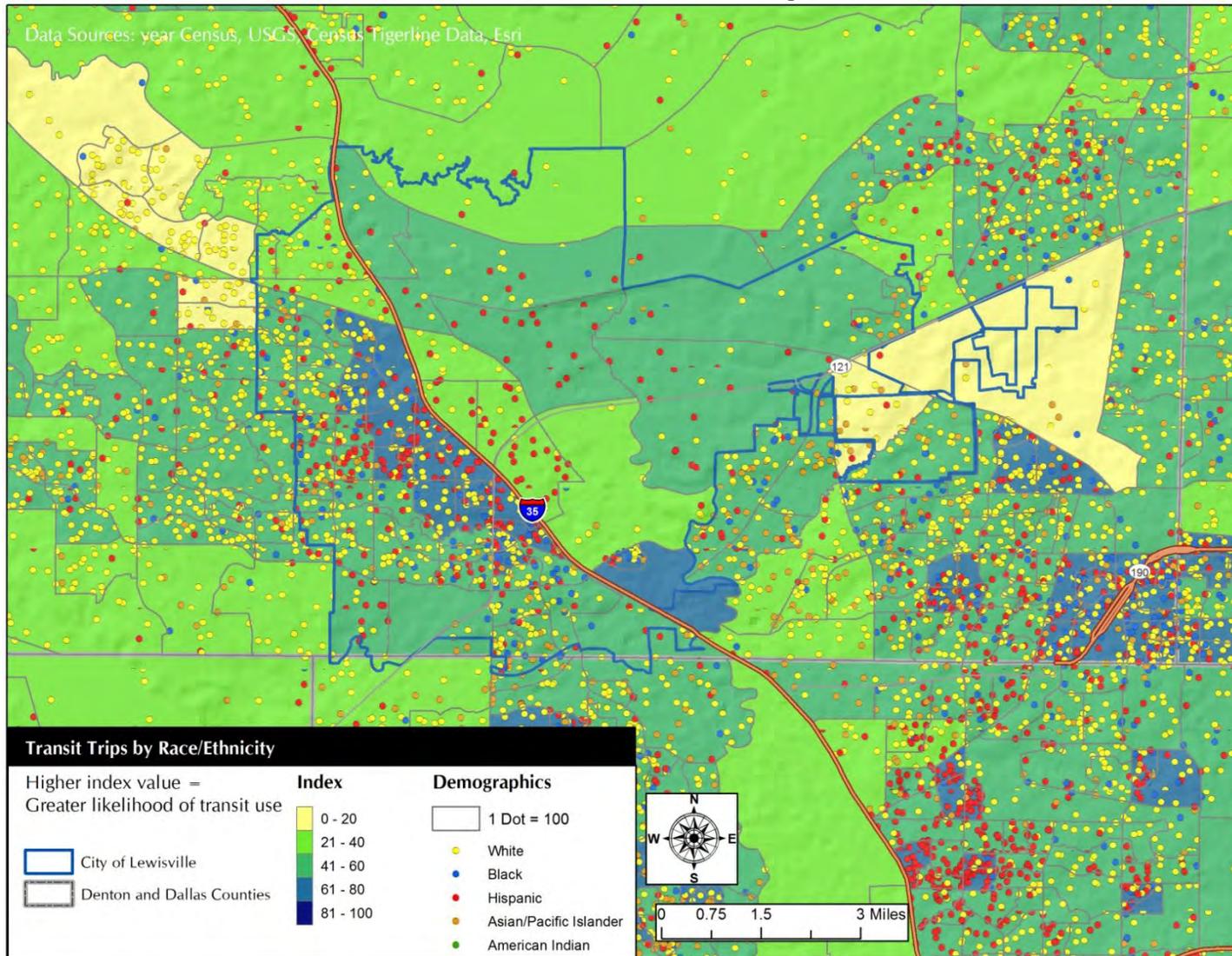
**Low Transportation Cost** – Echoing the transit index, Black, Hispanic, and Asian or Pacific Islander households had a higher index level for low transportation costs, or between 60 and 61, which is lower than Lewisville's indices by almost 10 points. This is compared to the white index level of 51.91, regionally. As one would expect, low transportation cost indices were higher in areas closer to city centers, and had lower ratings outside of these areas. These areas were also more likely to have concentrations of minority populations, as well

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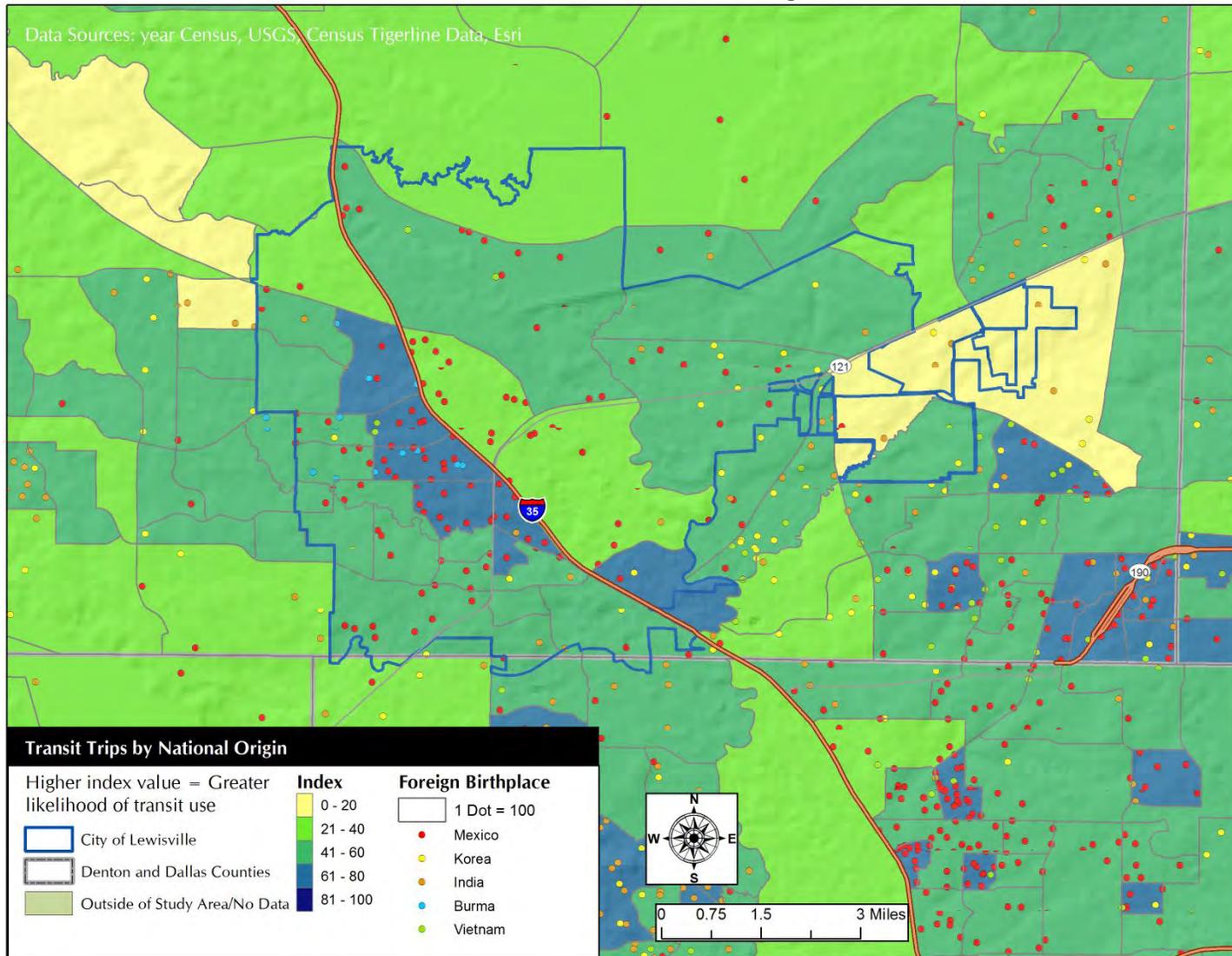
<sup>11</sup> Note that higher transportation cost index values indicate lower transportation costs.

as higher concentrations of foreign born populations. Families with children did not seem to be impacted, regionally, by this factor.

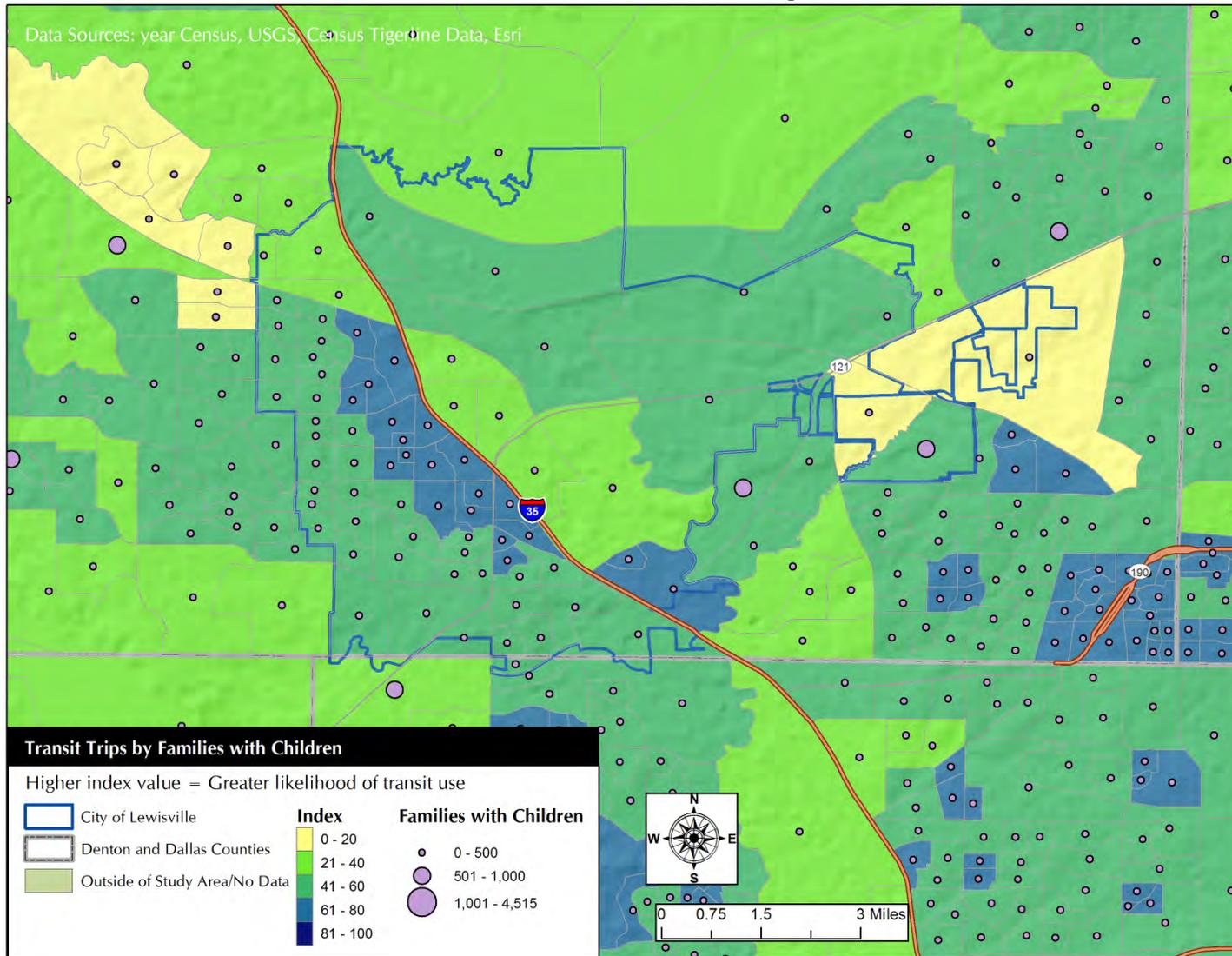
**Map IV.22**  
**AFFH Map 12 – Transit Trips by Race/Ethnicity**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



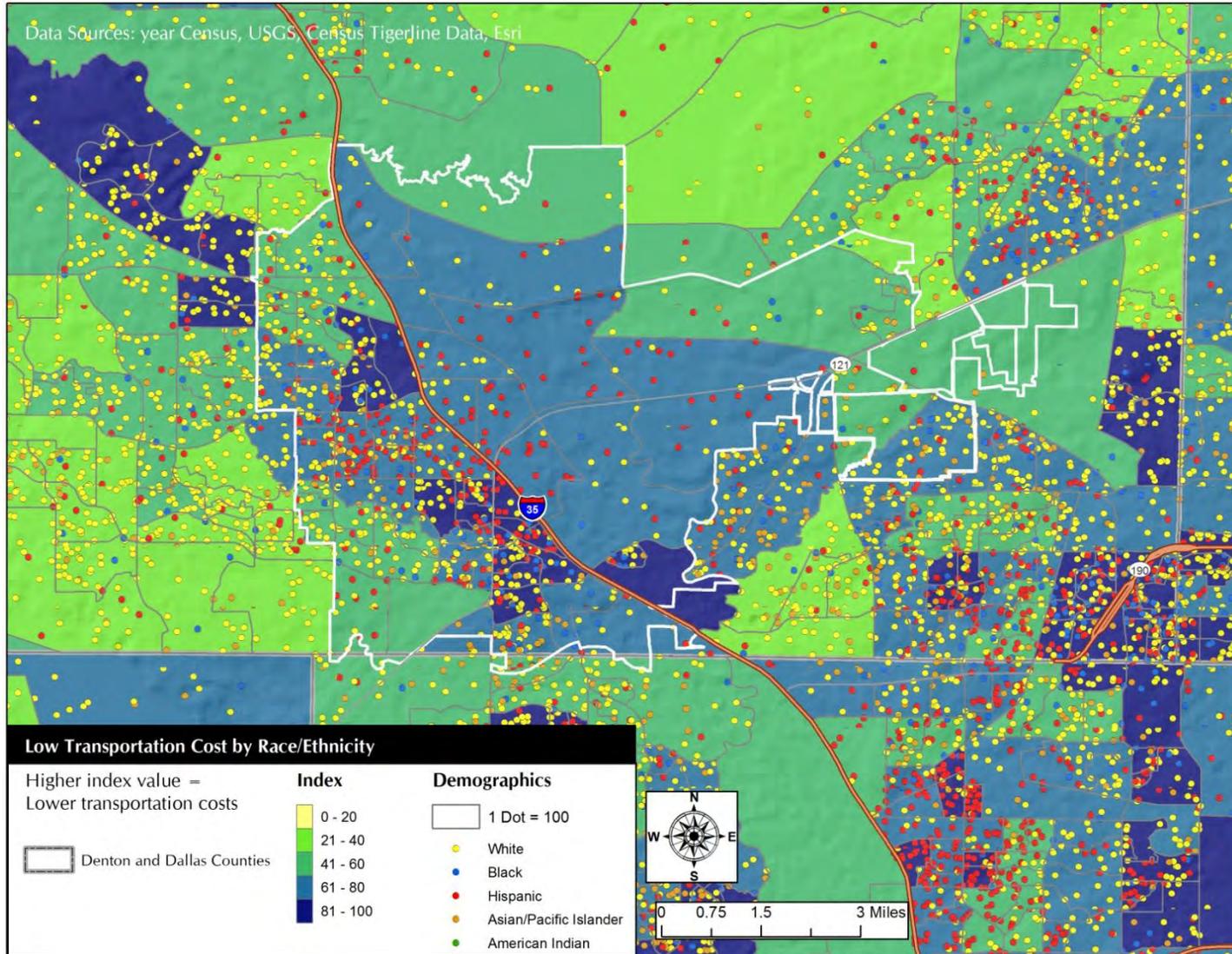
**Map IV.23**  
**AFFH Map 12 – Transit Trips by Race/Ethnicity**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



**Map IV.24**  
**AFFH Map 12 – Transit Trips by Families with Children**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline

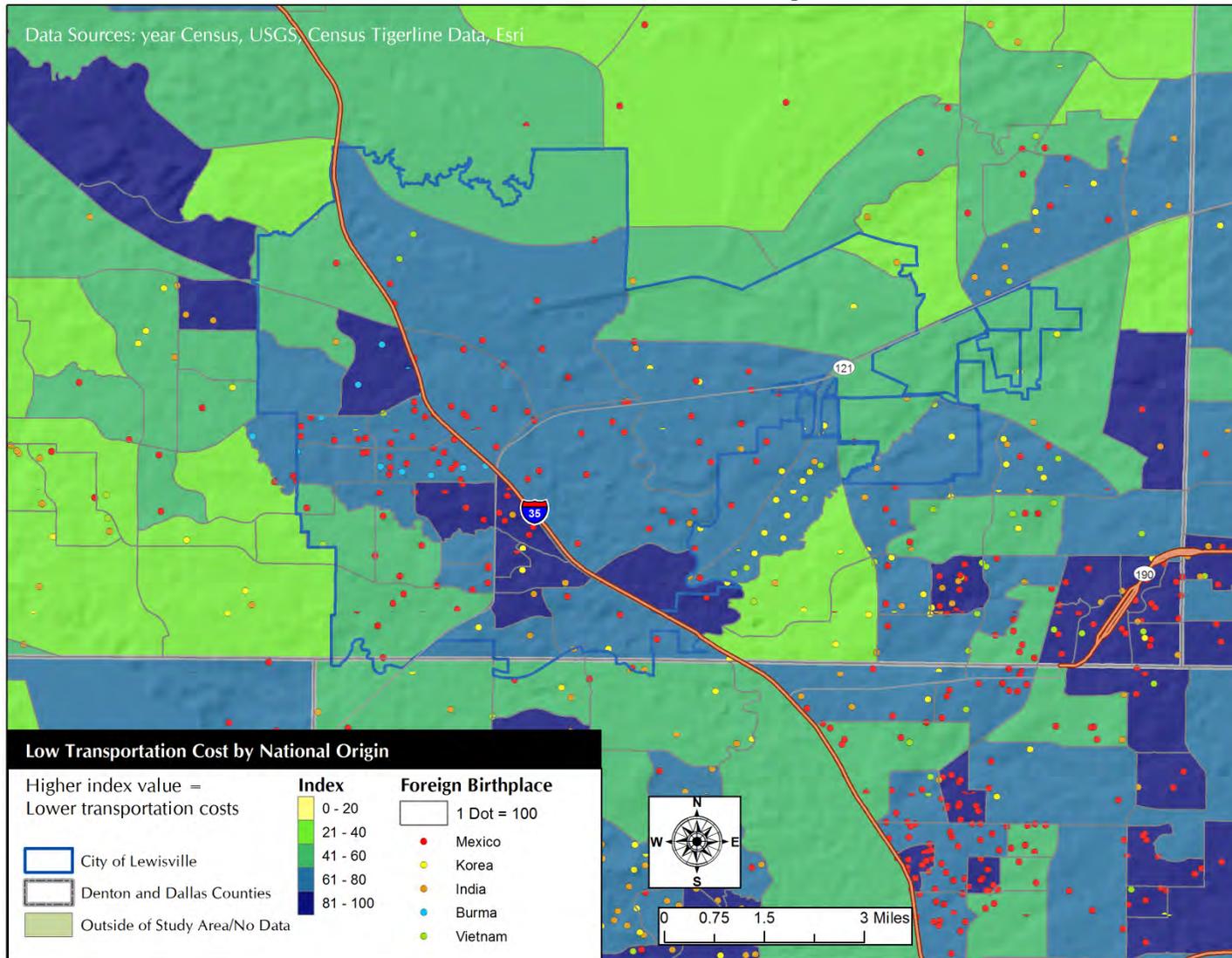


**Map IV.25**  
**AFFH Map 13 – Low Transportation Cost by Race/Ethnicity**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline

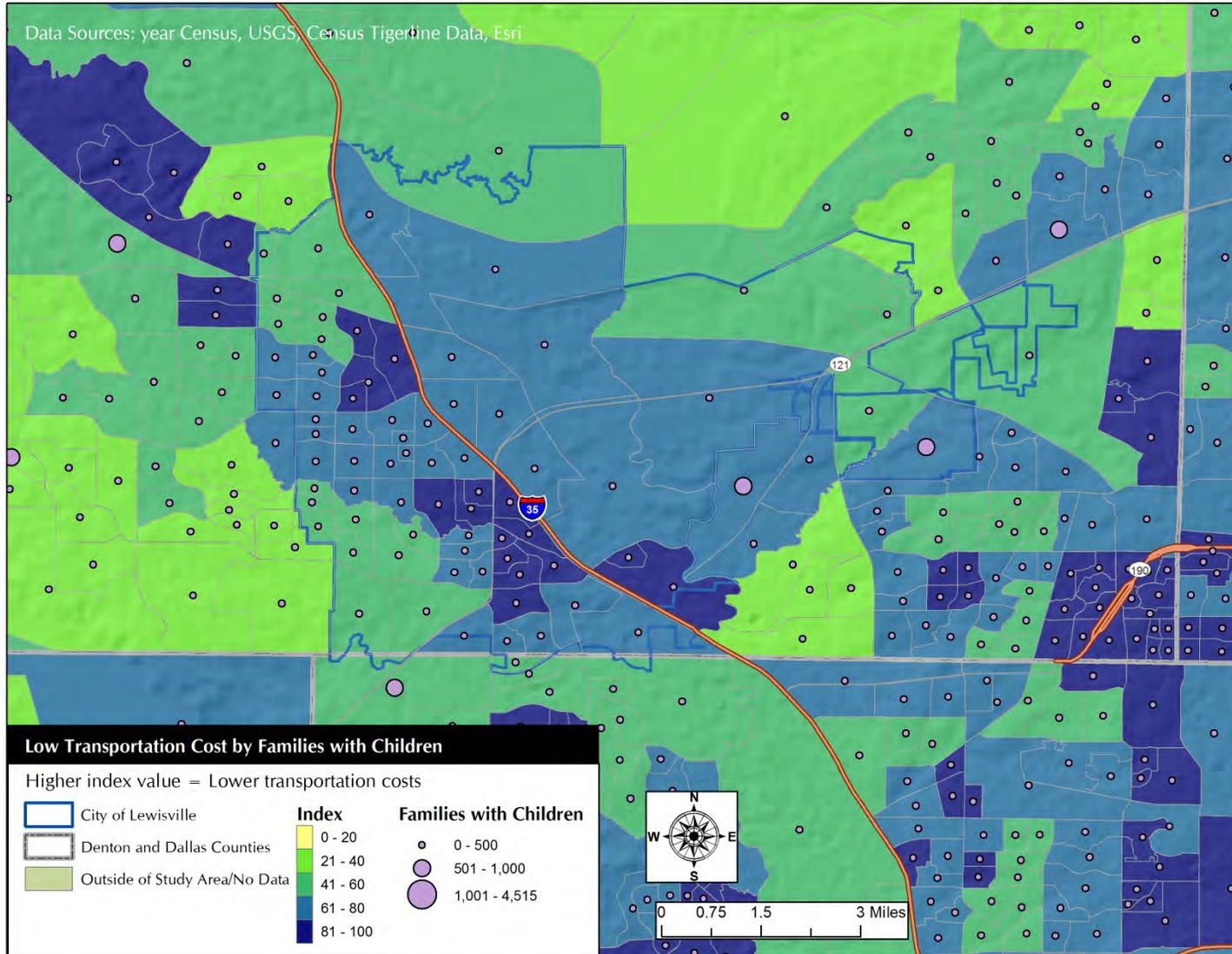


**Map IV.26**  
**AFFH Map 13 – Low Transportation Cost by National Origin**

Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



**Map IV.27**  
**AFFH Map 13 – Low Transportation Cost by Families with Children**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



## **LOW POVERTY EXPOSURE OPPORTUNITIES**

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The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score is more desirable, generally indicates less exposure to poverty at the neighborhood level.

In contrast to measures of transportation access discussed above, there were marked differences in exposure to poverty by race and ethnicity throughout the city. As shown in Table IV.25, white and Asian/Pacific Islander residents had the greatest access to low poverty areas. By contrast, Hispanic residents faced considerably higher levels of exposure to poverty.

These relationships are borne out in a geographic analysis of exposure to poverty by the distribution of residents of each racial/ethnic group. As shown in Map IV.28, areas with the greatest exposure to poverty in the city were located to the center of the city center, which held relatively high concentrations of Hispanic residents. Areas with higher concentrations of white and Asian residents ranked comparatively high in access to low poverty areas.

Geographic comparison of access to low poverty areas by national origin (i.e., foreign birthplace) and family status did not suggest that foreign-born residents or families with children were more likely to be exposed to poverty (Maps IV.29 and IV.30).

### ***Place of Residence and Exposure to Poverty***

As one might expect, residents to the north of the city center were more likely to be exposed to poverty than residents to the outside of the city center, as shown in Maps IV.28, IV.29, and IV.30.

### ***Groups Most Affected by Poverty***

As shown in Table IV.25, white and Asian/Pacific Islander residents had the greatest access to low poverty areas. By contrast, Hispanic residents faced considerably higher levels of exposure to poverty.

These relationships are borne out in a geographic analysis of exposure to poverty by the distribution of residents of each racial/ethnic group. As shown in Map IV.28, areas with the greatest exposure to poverty in the city were located to the north of the city center and east of I-35, which held relatively high concentrations of Hispanic residents. Areas with higher concentrations of white and Asian residents ranked comparatively high in access to low poverty areas.

Geographic comparison of access to low poverty areas by national origin (i.e., foreign birthplace) and family status did not suggest that foreign-born residents or families with children were more likely to be exposed to poverty (Maps IV.29 and IV.30).

### ***Jurisdiction's and region's policies effect on protected class groups' access low poverty areas***

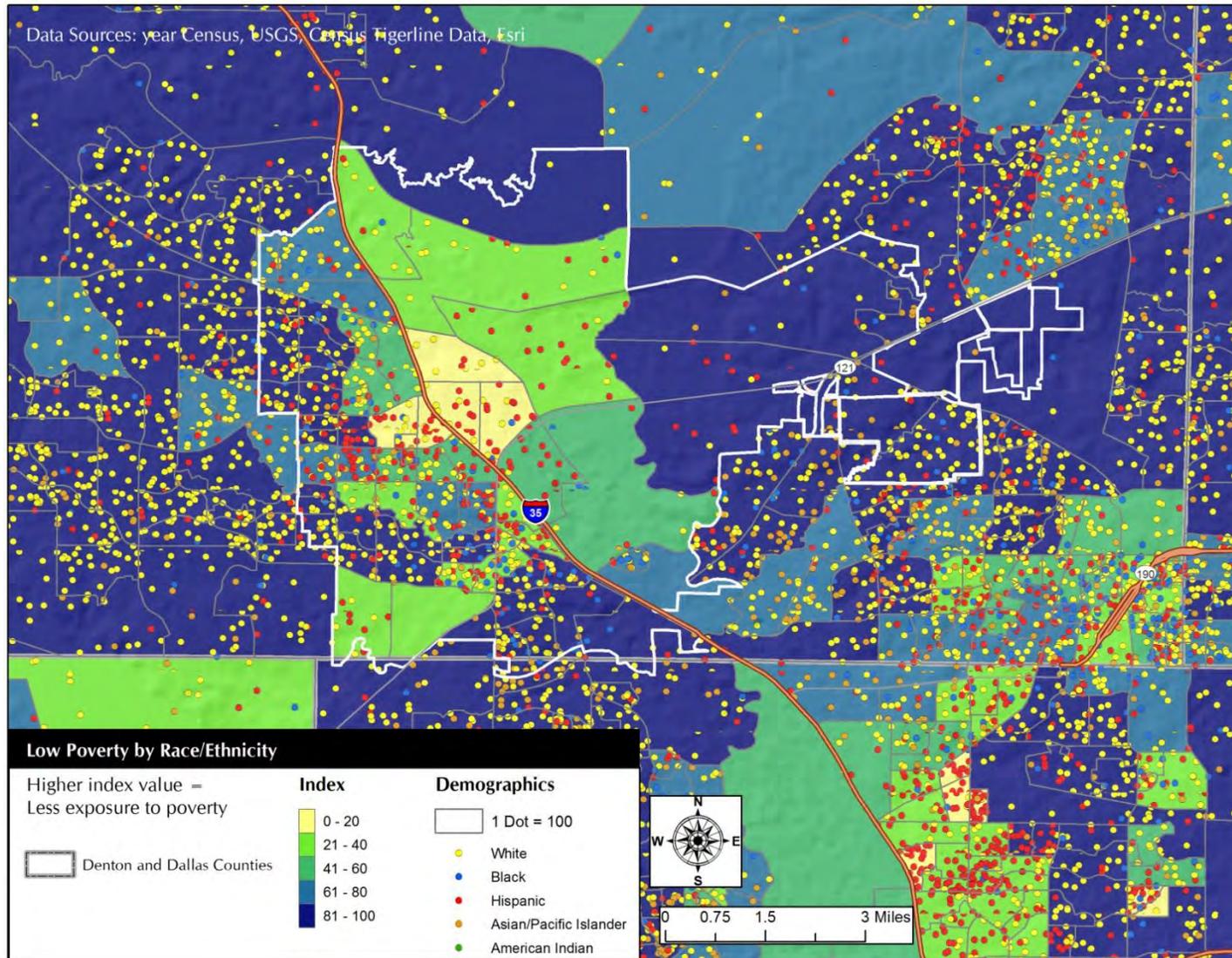
In general, areas that have lower density zoning also have less exposure to poverty. As seen in Maps IV.28-IV.30, racial/ethnic minorities tend to live in areas with higher exposure to poverty,

while areas with higher concentrations of families with children are in areas with lower exposure to poverty.

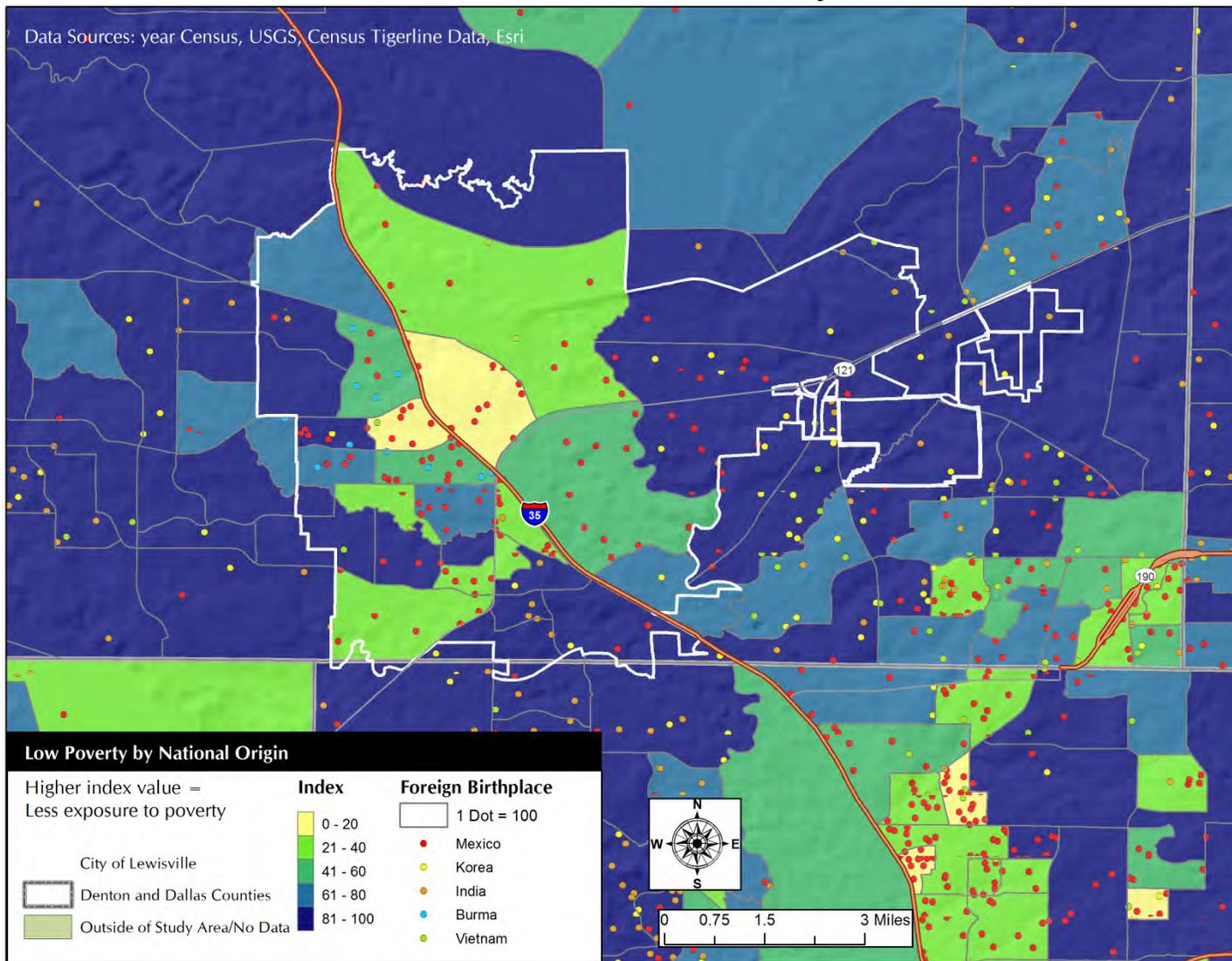
### **Region**

Hispanic households had the lowest rating on the low poverty index for the region, at 37.25. Black, non-Hispanic households were also markedly lower than white, Non-Hispanic households, at 40.78 versus 64.62. These rates were significantly higher in Lewisville. Hispanic, in particular, had low poverty index rates more than 17 percentage points higher in Lewisville than in the region as a whole. Black households also fared better in Lewisville in terms of the low poverty index. Regionally, lower index ratings were primarily seen in areas within and adjacent to the cities of Dallas, Fort Worth, and Arlington. While concentrations of persons from Mexico tended to cluster in areas with lower poverty ratings, families with children did not seem to particularly correspond with these areas.

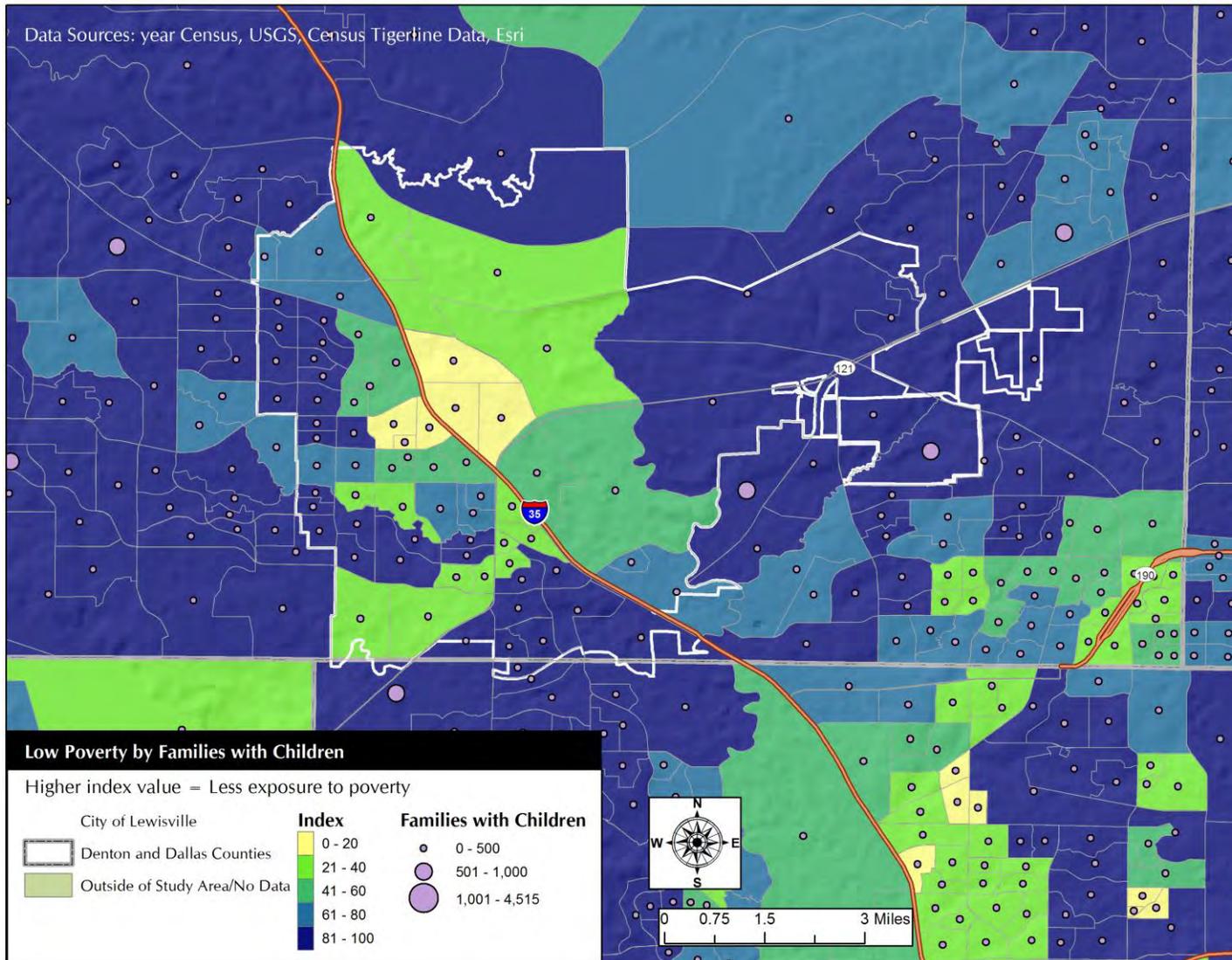
**Map IV.28**  
**AFFH Map 14 – Low Poverty by Race/Ethnicity**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



**Map IV.29**  
**AFFH Map 14 – Low Poverty by National Origin**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



**Map IV.30**  
**AFFH Map 14 – Low Poverty by Families with Children**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



## **ACCESS TO ENVIRONMENTALLY HEALTHY NEIGHBORHOODS**

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The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood.

The environmental health index suggests that air quality in Lewisville in southern parts of the city: Census tracts further to the north experienced higher environmental quality. Neither Table IV.25 nor Map IV.31 suggests that different racial or ethnic groups experienced differing levels of air quality throughout the city. Similarly, there was little evidence that air quality that residents enjoyed differed markedly by foreign birthplace, as shown in Map IV.29. The same was true of families with children, as shown in Map IV.33.

### ***Access to Healthy Neighborhoods***

Neither Table IV.25 nor Map IV.31 suggests that different racial or ethnic groups experienced differing levels of air quality throughout the city. Similarly, there was little evidence that air quality that residents enjoyed differed markedly by foreign birthplace, as shown in Map IV.32. The same was true of families with children, as shown in Map IV.33.

### **Region**

Regionally, white households had a higher environmental health index than most other racial/ethnic populations, at 50.60. Black, non-Hispanic households had an index of 45.26, while Hispanic households had an index of 43.43. Asian or Pacific Islander populations had an index of 44.07, while Native Americans were at 50.13. There were less racial and ethnic disparities in environmental health in the City of Lewisville, and ranged between 41 and 44 for all groups. Regionally, lower environmental health indices were in and adjacent to the major city areas of Dallas, Fort Worth, and Arlington. Areas farther out from these metropolitan areas had higher environmental health indices. Minority populations are concentrated in areas with lower environmental health ratings; this is also true based on national origin. This factor did not appear to have much impact on families with children.

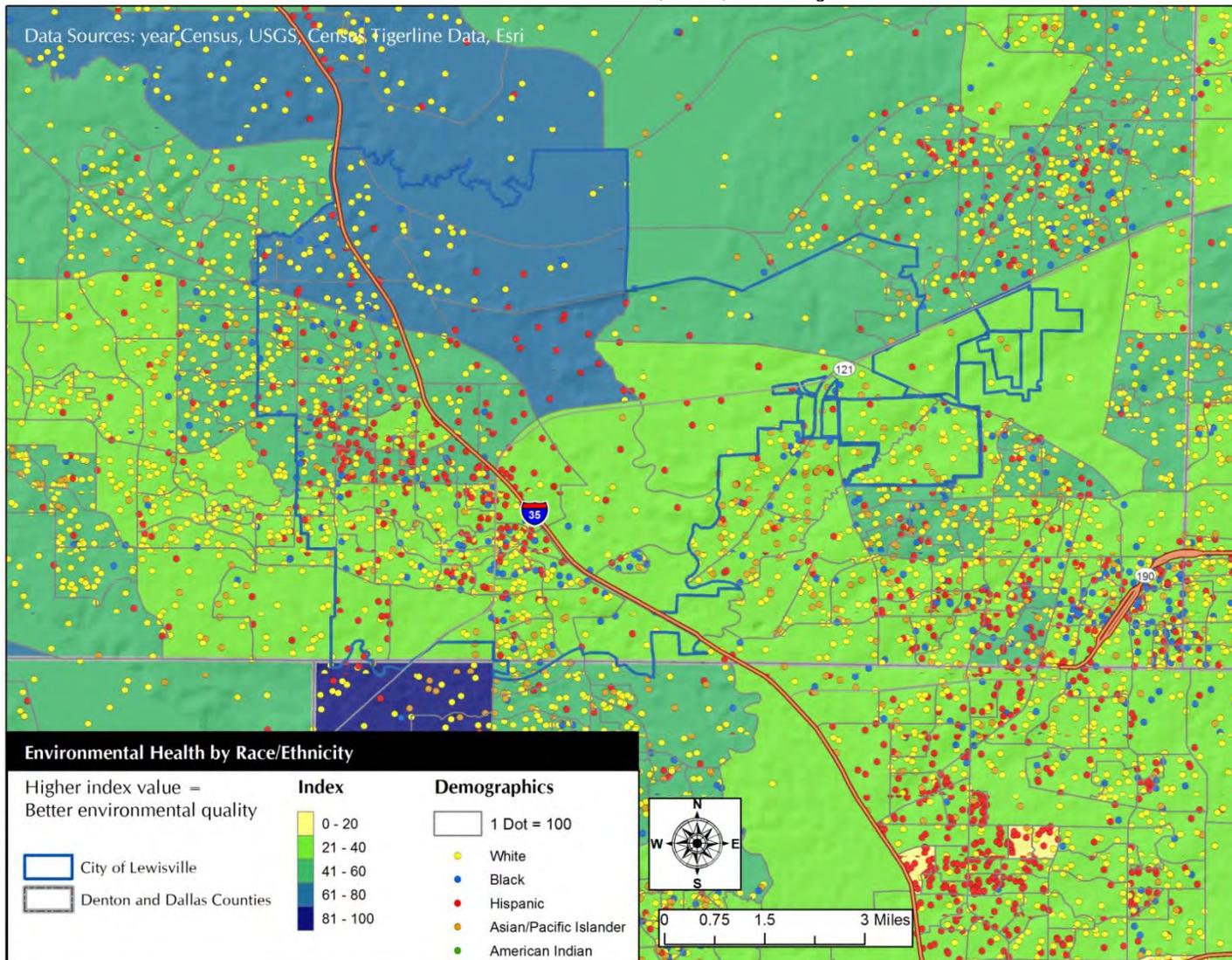
## **PATTERNS IN DISPARITIES IN ACCESS TO OPPORTUNITY**

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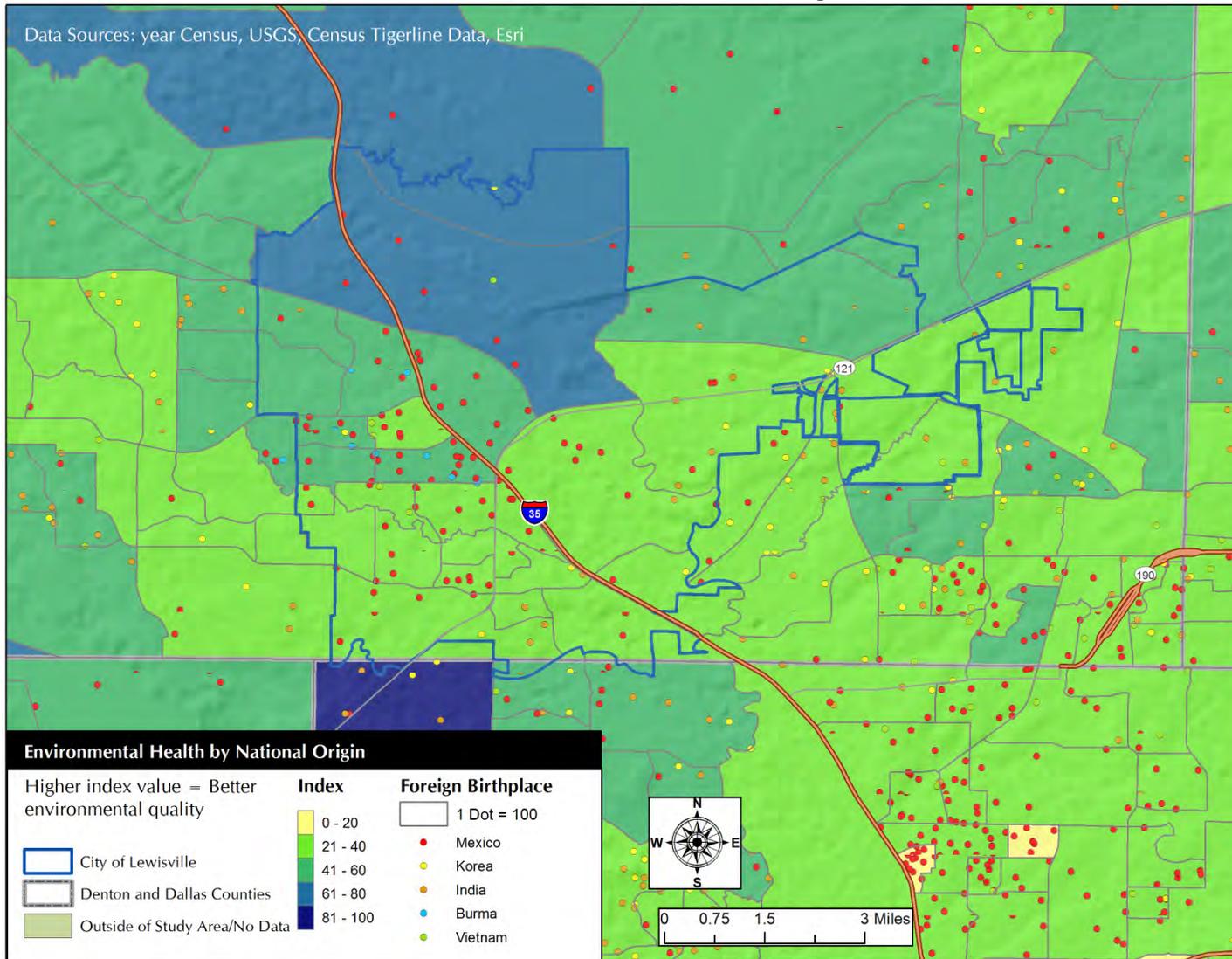
The degree to which residents had access to low poverty areas and proficient grade schools differed depending on their race or ethnicity. In both cases, Hispanic residents were observed to have considerably lower access to opportunity than residents of other racial/ethnic groups. Other measures of opportunity (use of public transit, transportation costs, and environmental quality) did not differ dramatically by race or ethnicity.

Analysis of access to opportunity by national origin or family size did not reveal such marked variations as was observed between racial/ethnic groups.

**Map IV.31**  
**AFFH Map 15 – Environmental Health by Race/Ethnicity**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



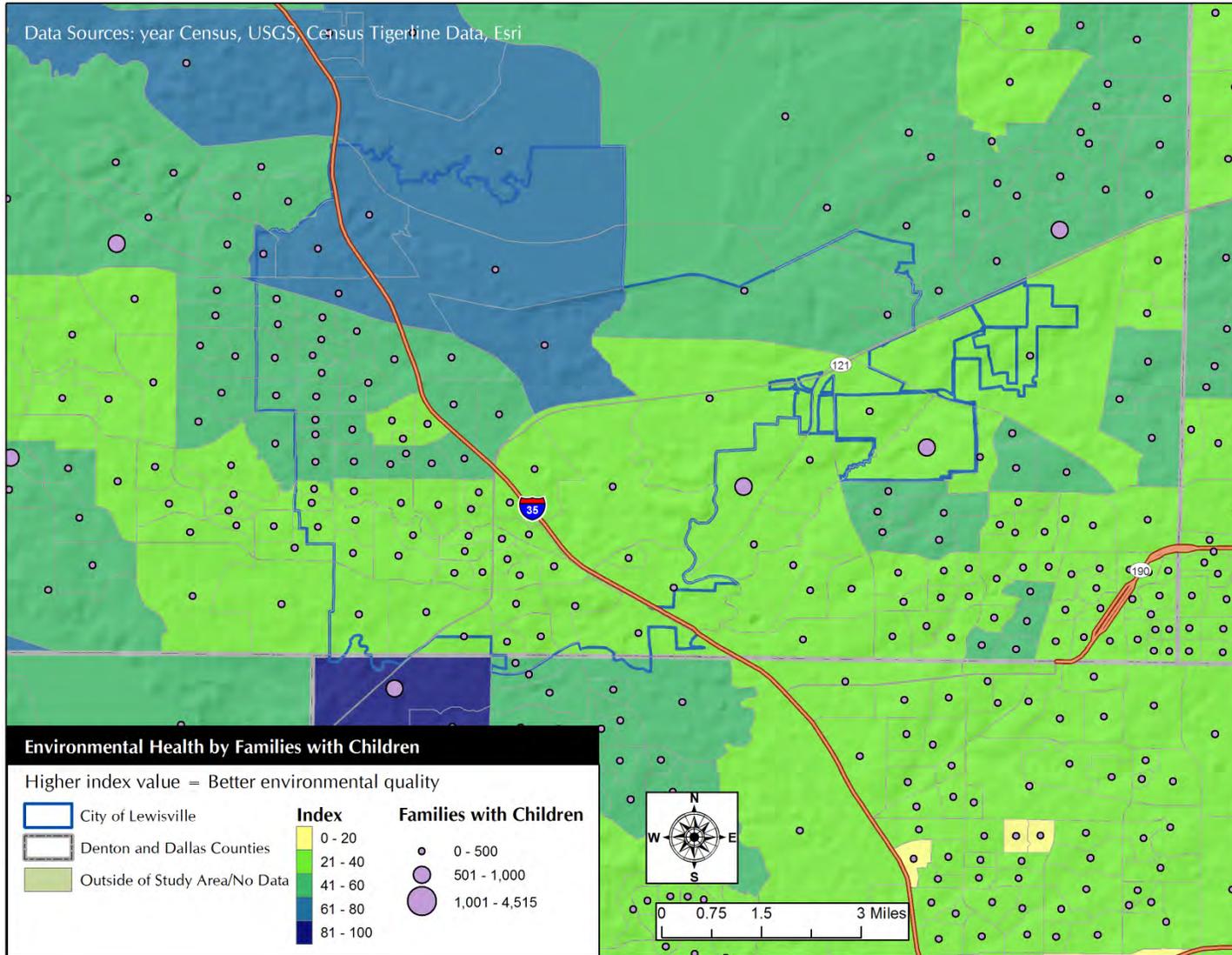
**Map IV.32**  
**AFFH Map 15 – Environmental Health by National Origin**  
 Lewisville, Texas  
 2016 HUD AFFH Database, USGS, Census Tigerline



**Map IV.33**  
**AFFH Map 15 – Environmental Health by Families with Children**

Lewisville, Texas

2016 HUD AFFH Database, USGS, Census Tigerline



## Additional Information

The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, and family status. Information pertaining to sex can be evaluated in terms of home loan applications. The availability of information based HMDA data from 2008 to 2015 shows an average denial rate of loan applications that are almost two percentage points higher for females than males, although during 2011 and 2012 the denial rates for females was almost the same as that for males.

**Table IV.26**  
**Denial Rates by Gender of Applicant**  
 City of Lewisville  
 2008–2015 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	13.3%	18.3%	17.1%	33.3%	15.2%
2009	10.6%	12.3%	10.8%	.0%	11.2%
2010	16.4%	16.6%	20.0%	%	16.7%
2011	15.4%	15.8%	18.3%	%	15.7%
2012	15.5%	14.6%	26.1%	%	15.9%
2013	11.1%	16.5%	14.3%	%	12.9%
2014	10.5%	12.4%	12.7%	%	11.2%
2015	9.4%	11.0%	12.8%	%	10.1%
<b>Average</b>	<b>12.6%</b>	<b>14.8%</b>	<b>16.5%</b>	<b>25.0%</b>	<b>13.5%</b>

According to public input, the Chin population in Lewisville is concentrated in communities and limited by language barriers. As such, the Chin population lacks access to healthy neighborhoods and medical facilities that can meet their needs.

## D. DISPROPORTIONATE HOUSING NEEDS

The Census Bureau collects data on several topics that HUD has identified as “housing problems”. For the purposes of this report, housing problems include overcrowding, incomplete plumbing or kitchen facilities, and cost-burden.

A relatively small percentage of households were considered over-crowded in 2000, meaning that they include more than one resident per room but less than 1.5. The same was true of severely overcrowded households, which include 1.5 residents per room or more. As shown in Table IV.27 an estimated 3.2 percent of households were overcrowded in 2000. That figure rose slightly after 2000, to around 3.5 percent in 2010-2014. The percentage of severely overcrowded units fell from 2.7 percent to 0.6 percent over that same time period. Generally speaking, renter-occupied units were more likely than owner-occupied units to experience overcrowding. The City instituted a multi-family inspection program that may have impacted severe overcrowding. More recently the City expanded rental inspections to single family units.

**Table IV.27**  
**Overcrowding and Severe Overcrowding**

City of Lewisville  
2000 Census SF3 & 2014 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
<b>Owner</b>							
2000 Census	15,585	96.4%	362	2.2%	215	1.3%	16,162
2014 Five-Year ACS	16,562	97.1%	381	2.2%	117	.7%	17,060
<b>Renter</b>							
2000 Census	12,652	91.3%	613	4.4%	598	4.3%	13,863
2014 Five-Year ACS	20,173	95.1%	942	4.4%	97	0.5%	21,212
<b>Total</b>							
2000 Census	28,237	94.0%	975	3.2%	813	2.7%	30,025
2014 Five-Year ACS	36,735	96.0%	1,323	3.5%	214	.6%	38,272

An even smaller fraction of households were lacking complete plumbing facilities in 2000, and that share had only fallen by 2010-2014. Plumbing facilities are considered to be incomplete if a household is missing any of the following: a flush toilet, piped hot and cold running water, a bathtub, or a shower. As shown in Table IV.28, these features were missing from less than one percent of households in Lewisville.

**Table IV.28**  
**Households with Incomplete Plumbing Facilities**

City of Lewisville  
2000 Census SF3 & 2014 Five-Year ACS Data

Households	2000 Census	2014 Five-Year ACS
With Complete Plumbing Facilities	29,965	38,234
Lacking Complete Plumbing Facilities	60	38
<b>Total Households</b>	<b>30,025</b>	<b>38,272</b>
<b>Percent Lacking</b>	<b>0.2%</b>	<b>0.1%</b>

On the other hand, households lacking complete kitchen facilities became increased slightly after 2000, and these households represented more than one percent of households overall, as shown in Table IV.29. A household is considered to lack complete kitchen facilities when it does not have a range or cook top and oven, a sink with piped hot and cold running water, and a refrigerator.

**Table IV.29**  
**Households with Incomplete Kitchen Facilities**

City of Lewisville  
2000 Census SF3 & 2014 Five-Year ACS Data

Households	2000 Census	2014 Five-Year ACS
With Complete Kitchen Facilities	30,004	37,799
Lacking Complete Kitchen Facilities	21	473
<b>Total Households</b>	<b>30,025</b>	<b>38,272</b>
<b>Percent Lacking</b>	<b>.1%</b>	<b>1.2%</b>

Households experiencing a cost-burden, an increasingly common problem after 2000, affected a much larger share of households in the study area. A household is considered cost-burdened when between 30 and 50 percent of its income goes toward housing costs, and *severely* cost-burdened when housing costs consume more than 50 percent of a household's income. As

shown in Table IV.30, an estimated 16.6 percent of study area households were paying between 30 and 50 percent of their monthly income toward housing costs in 2000 and by 2014 that share had grown by 4.3 percentage points. Some 12.0 percent of households were severely cost-burdened in 2014, up from 8.0 percent in 2000. As was the case with overcrowding, renters were more likely to experience a cost burden or severe cost burden than homeowners, even those whose homes were still under mortgage.

**Table IV.30**  
**Cost Burden and Severe Cost Burden by Tenure**

City of Lewisville  
2000 Census & 2014 Five-Year ACS Data

Data Source	31%-50%		Above 50%		Total
	Households	% of Total	Households	% of Total	
<b>Owner With a Mortgage</b>					
2000 Census	1,616	12.90%	564	4.50%	12,533
2014 Five-Year ACS	2,325	17.20%	1,032	7.60%	13,534
<b>Owner Without a Mortgage</b>					
2000 Census	134	8.80%	72	4.70%	1,521
2014 Five-Year ACS	361	10.20%	125	3.50%	3,526
<b>Renter</b>					
2000 Census	2,872	20.70%	1,608	11.60%	13,844
2014 Five-Year ACS	5,295	25.00%	3,441	16.20%	21,212
<b>Total</b>					
2000 Census	4,622	16.60%	2,244	8.00%	27,898
2014 Five-Year ACS	7,981	20.90%	4,598	12.00%	38,272

**Table IV.31**  
**Demographics of Households with Severe Housing Cost Burden**

City of Lewisville, Dallas-Ft Worth-Arlington CBSA  
CHAS

Race/Ethnicity	Lewisville			Dallas-Ft Worth-Arlington		
	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	1,985	21,729	9.14%	142,755	1,341,275	10.64%
Black, Non-Hispanic	510	3,770	13.53%	74,655	352,239	21.19%
Hispanic	1,180	8,045	14.67%	78,390	456,966	17.15%
Asian or Pacific Islander, Non-Hispanic	305	2,359	12.93%	15,163	110,736	13.69%
Native American, Non-Hispanic	40	120	33.33%	1,139	8,127	14.02%
Other, Non-Hispanic	210	1,099	19.11%	5,519	32,493	16.99%
Total	4,230	37,135	11.39%	317,621	2,301,880	13.80%
<b>Household Type and Size</b>						
Family households, <5 people	1,749	19,345	9.04%	146,518	1,319,470	11.10%
Family households, 5+ people	339	3,940	8.60%	34,600	278,549	12.42%
Non-family households	2,130	13,845	15.38%	136,574	703,879	19.40%

The table above shows housing cost burden as experienced demographically for the City of Lewisville as well as the region. Hispanic residents were shouldered with a much larger housing cost burden in the city than in the region, while the black population had a higher housing cost burden in the metro region than in the city.

Some 35.6 percent of Lewisville households experienced one or more housing problems in 2008-2012, as shown in Table IV.31, on the following page. The incidence of housing problems differed markedly by race or ethnicity: more than seventy percent of Native American households were experiencing housing problems during that time period, along with over 48.7 percent of Hispanic households. This is compared to 41.9 percent of black residents and 29.0 percent of white residents.

Housing problems were also more common among large family (5 or more people) households than small family households: 56.9 percent of large family households were living with one or more housing problem, well above the 35.6 percent average. The incidence of housing problems among small family households, by contrast, was below average: 29.3 percent for small families (i.e., less than five members). Non-family households faced housing problems at a rate of 38.5 percent.

An estimated 15.6 percent of city households experienced severe housing problems in 2008-2012. Native American and Hispanic households were more likely than other groups to experience severe housing problems.

### **Region**

Black, non-Hispanic households and Hispanic households both have disproportionate housing problems. Region-wide, some 35.05 percent of households face housing problems, which is about equal to the percentage of households in Lewisville with housing problems. Black, non-Hispanic households face housing problems at a rate of 45.92 percent, and Hispanic households face housing problems at a rate of 50.38 percent. These groups fair slightly better in Lewisville. In addition, large family households (5+ people) in the region also face a disproportionate share of housing problems, with some 50.67 percent, compared to the 56.85 percent for Lewisville households. This same pattern is true for households facing severe housing problems. The regional average rate for severe housing problems is 18.15 percent. Black, non-Hispanic households face severe housing problems at a rate of 24.57. However, the only minority group facing a disproportionate share of severe housing problems is Hispanic households, at 30.20 percent. In terms of severe cost burden, black households are fairing better in Lewisville than in the region, while Native American households fair worse in Lewisville than the region.

Regionally, the highest percent of households with housing burdens are located in the major city center areas, which are also areas with higher minority populations. These areas also seem to correspond with high populations of foreign born residents, as shown in Map 8.

**Table IV.32**  
**HUD AFFH Table 9 – Disproportionate Housing Needs**  
 Lewisville, Texas  
 2016 HUD AFFH Database

Disproportionate Housing Needs		Lewisville	
Households experiencing any of 4 housing problems <sup>1</sup>	# with problems	# households	% with problems
<b>Race/Ethnicity</b>			
White, Non-Hispanic	6,305	21,729	29.02
Black, Non-Hispanic	1,580	3,770	41.91
Hispanic	3,920	8,045	48.73
Asian or Pacific Islander, Non-Hispanic	910	2,359	38.58
Native American, Non-Hispanic	85	120	70.83
Other, Non-Hispanic	440	1,099	40.04
<b>Total</b>	<b>13,235</b>	<b>37,135</b>	<b>35.64</b>
<b>Household Type and Size</b>			
Family households, <5 people	5,665	19,345	29.28
Family households, 5+ people	2,240	3,940	56.85
Non-family households	5,335	13,845	38.53
<b>Households experiencing any of 4 Severe Housing Problems<sup>2</sup></b>		<b># with severe problems</b>	<b>% with severe problems</b>
<b>Race/Ethnicity</b>			
White, Non-Hispanic	2,325	21,729	10.70
Black, Non-Hispanic	565	3,770	14.99
Hispanic	2,085	8,045	25.92
Asian or Pacific Islander, Non-Hispanic	540	2,359	22.89
Native American, Non-Hispanic	50	120	41.67
Other, Non-Hispanic	225	1,099	20.47
<b>Total</b>	<b>5,800</b>	<b>37,135</b>	<b>15.62</b>

1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Data Sources: CHAS, refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

### ***Geographic Distribution of Housing Problems***

Households that were experiencing housing problems accounted for 20 to 40 percent of all households in most Census tracts throughout the city, as shown in Map IV.34. Locations of census tracts with a greater incidence of housing problems were located around the city, as also seen in the map. In these areas, 40 to 60 percent of households were living with one or more housing problems.

### ***Families and Available Housing Stock***

There were approximately 3,900 households in the city that included five or more members. Around 2,200 of those households were experiencing one or more housing problems at that time, or around 56.9 percent. By this measure, families with children were more or less likely than the average household to experience housing problems.

**Table IV.33**  
**Disproportionate Housing Needs – Regional Compare**  
 Dallas-Ft Worth-Arlington CBSA  
 2016 HUD AFFH Database

<b>Disproportionate Housing Needs</b>			
<b>Dallas-Ft Worth-Arlington CBSA</b>			
<b>Households experiencing any of 4 housing problems<sup>1</sup></b>	<b># with problems</b>	<b># households</b>	<b>% with problems</b>
<b>Race/Ethnicity</b>			
White, Non-Hispanic	363,455	1,341,275	27.10%
Black, Non-Hispanic	161,747	352,239	45.92%
Hispanic	230,215	456,966	50.38%
Asian or Pacific Islander, Non-Hispanic	36,753	110,736	33.19%
Native American, Non-Hispanic	2,571	8,127	31.64%
Other, Non-Hispanic	12,005	32,493	36.95%
<b>Total</b>	<b>806,720</b>	<b>2,301,880</b>	<b>35.05%</b>
<b>Household Type and Size</b>			
Family households, <5 people	377,380	1,319,470	28.60%
Family households, 5+ people	141,128	278,549	50.67%
Non-family households	288,235	703,879	40.95%
<b>Households experiencing any of 4 Severe Housing Problems<sup>2</sup></b>			
	<b># with severe problems</b>	<b># households</b>	<b>% with severe problems</b>
<b>Race/Ethnicity</b>			
White, Non-Hispanic	164,434	1,341,275	12.26%
Black, Non-Hispanic	86,556	352,239	24.57%
Hispanic	138,014	456,966	30.20%
Asian or Pacific Islander, Non-Hispanic	20,888	110,736	18.86%
Native American, Non-Hispanic	1,470	8,127	18.09%
Other, Non-Hispanic	6,329	32,493	19.48%
<b>Total</b>	<b>417,720</b>	<b>2,301,880</b>	<b>18.15%</b>

1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

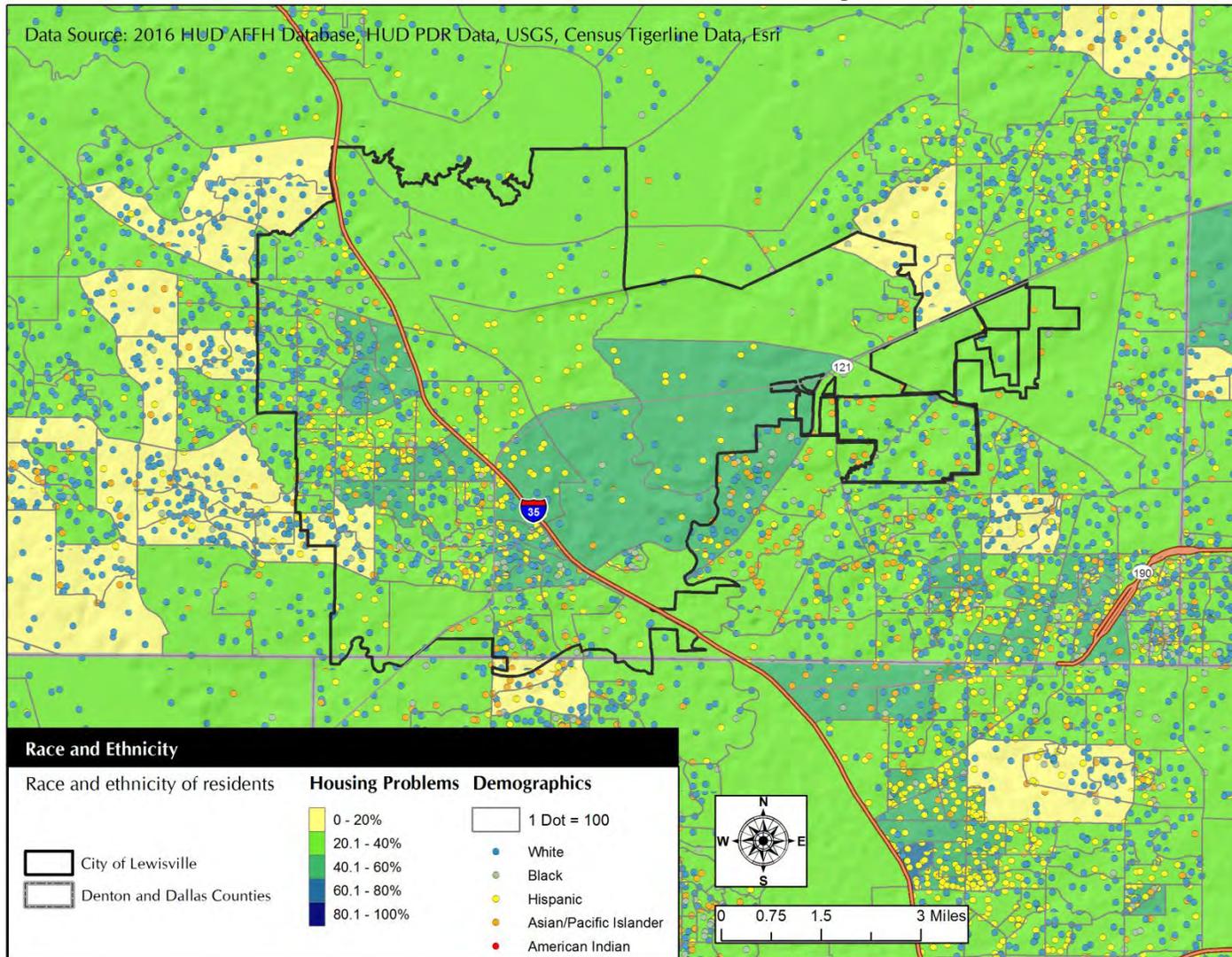
Data Sources: CHAS, refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

The table above shows housing needs for the region. The largest ethnic groups to experience these needs are Hispanic and Blacks, with 50 percent and 45 percent, respectively, of households experiencing any of 4 housing problems. The ethnic groups follow a similar pattern for severe housing problems, with Hispanic and Black households experiencing the highest within the region.

### ***Additional Information***

Public input suggested that there are additional groups that are facing disproportionate share of housing problems within Lewisville that may not be represented by the data provided. Particularly, this may be present for the Chin community in Lewisville. Public comments stated that this population is not counted accurately by the data, and a large proportion of this refugee population is cost burdened, and requires two or three jobs to be able to afford housing costs in Lewisville.

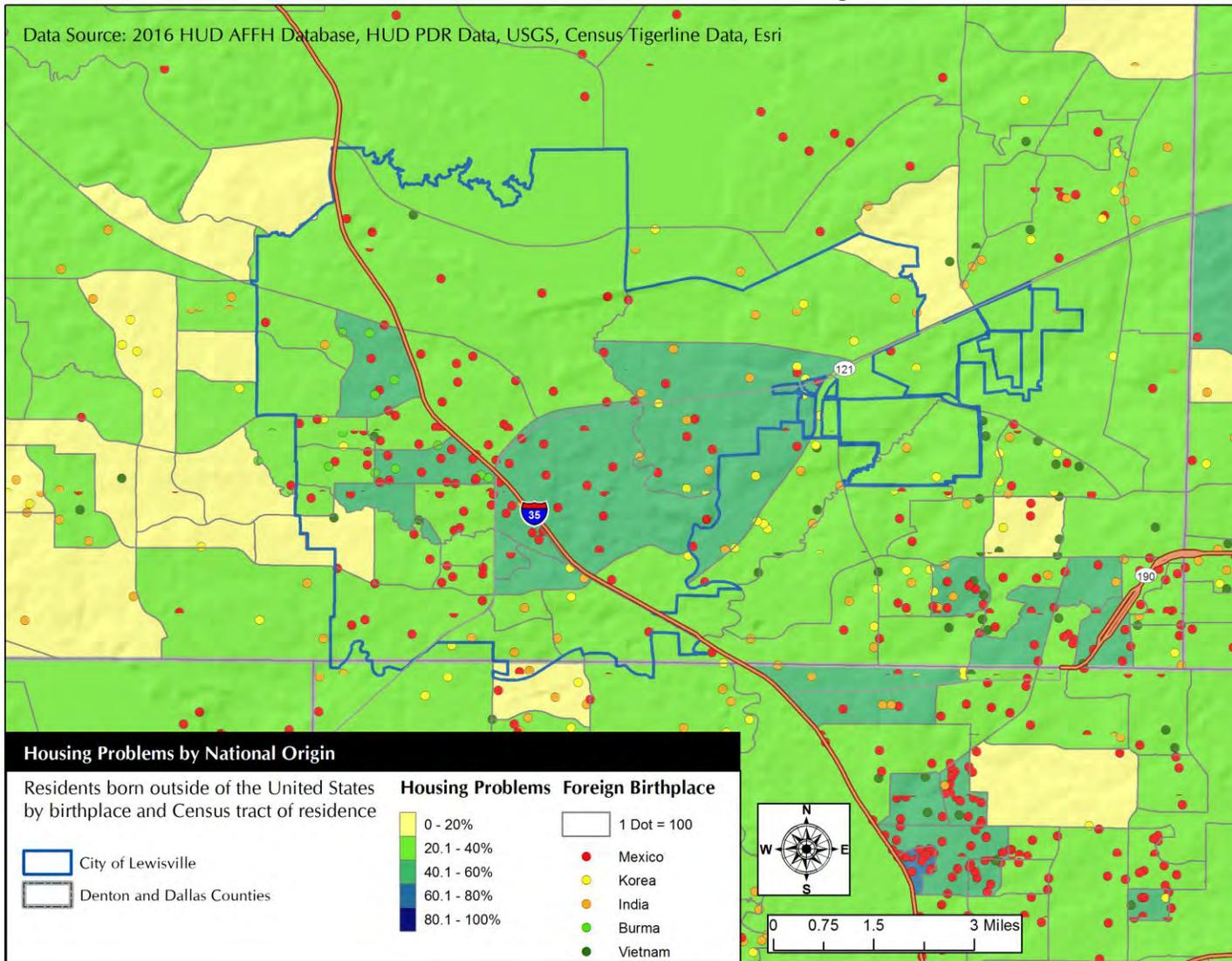
**Map IV.34**  
**AFFH Map 7 – Housing Problems by Race/Ethnicity**  
 Lewisville, Texas  
 2016 HUD AFFH Database, HUD PDR, USGD, Census Tigerline



### Map IV.35 AFFH Map 8 – Housing Problems by National Origin

Lewisville, Texas

2016 HUD AFFH Database, HUD PDR, USGS, Census Tigerline



## E. PUBLICLY SUPPORTED HOUSING ANALYSIS

### PUBLICLY SUPPORTED HOUSING DEMOGRAPHICS

Black households were disproportionately represented among households living in most types of public-assisted housing: around 60 percent of households living in publicly supported Housing units. By comparison, black residents accounted for around 11.2 percent of the overall population in 2010. All other racial or ethnic groups were underrepresented among public-assisted housing units compared to their representation in the population as a whole.

**Table IV. 34**  
**HUD AFFH Table 6 – Publicly Supported Housing Residents by Race/Ethnicity**  
 Lewisville, Texas  
 2016 HUD AFFH Database, 2010 Census

**Table 6 - Publicly Supported Housing Residents by Race/Ethnicity**

Lewisville	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing								
Project-Based Section 8								
Other Multifamily								
HCV Program	76	21.78	209	59.89	52	14.90	12	3.44
<b>0-30% of AMI</b>	729	33.61	245	11.30	775	35.73	205	9.45
<b>0-50% of AMI</b>	2,234	35.78	660	10.57	2,200	35.23	535	8.57
<b>0-80% of AMI</b>	5,974	44.95	1,530	11.51	4,070	30.63	825	6.21
<b>Lewisville</b>	48,349	49.70	10,523	10.82	27,919	28.70	7,941	8.16

Note 1: Data Sources: Decennial Census; APSH; CHAS

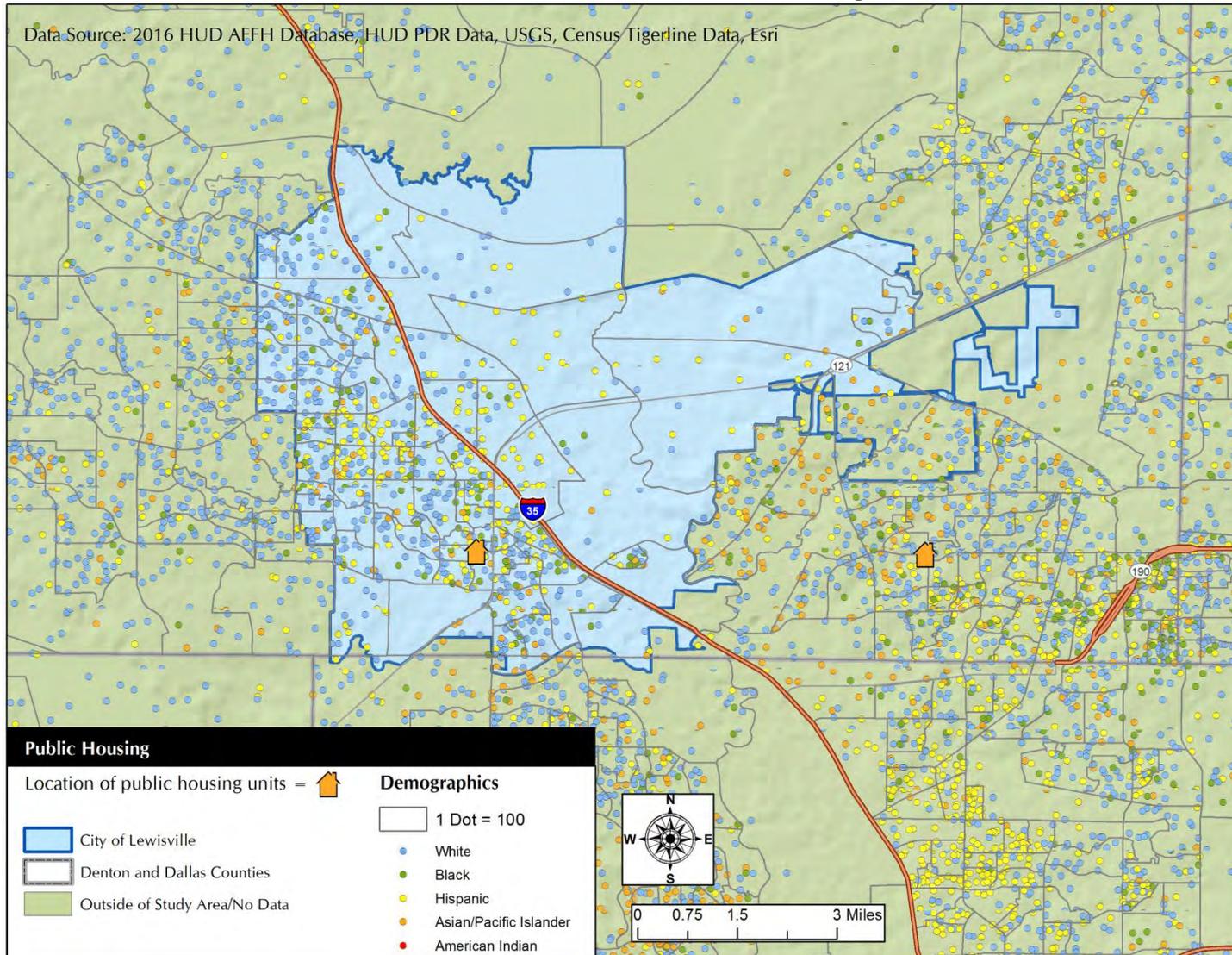
Note 2: #s presented are numbers of households not individuals.

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

### *Publicly Supported Housing Location and Occupancy*

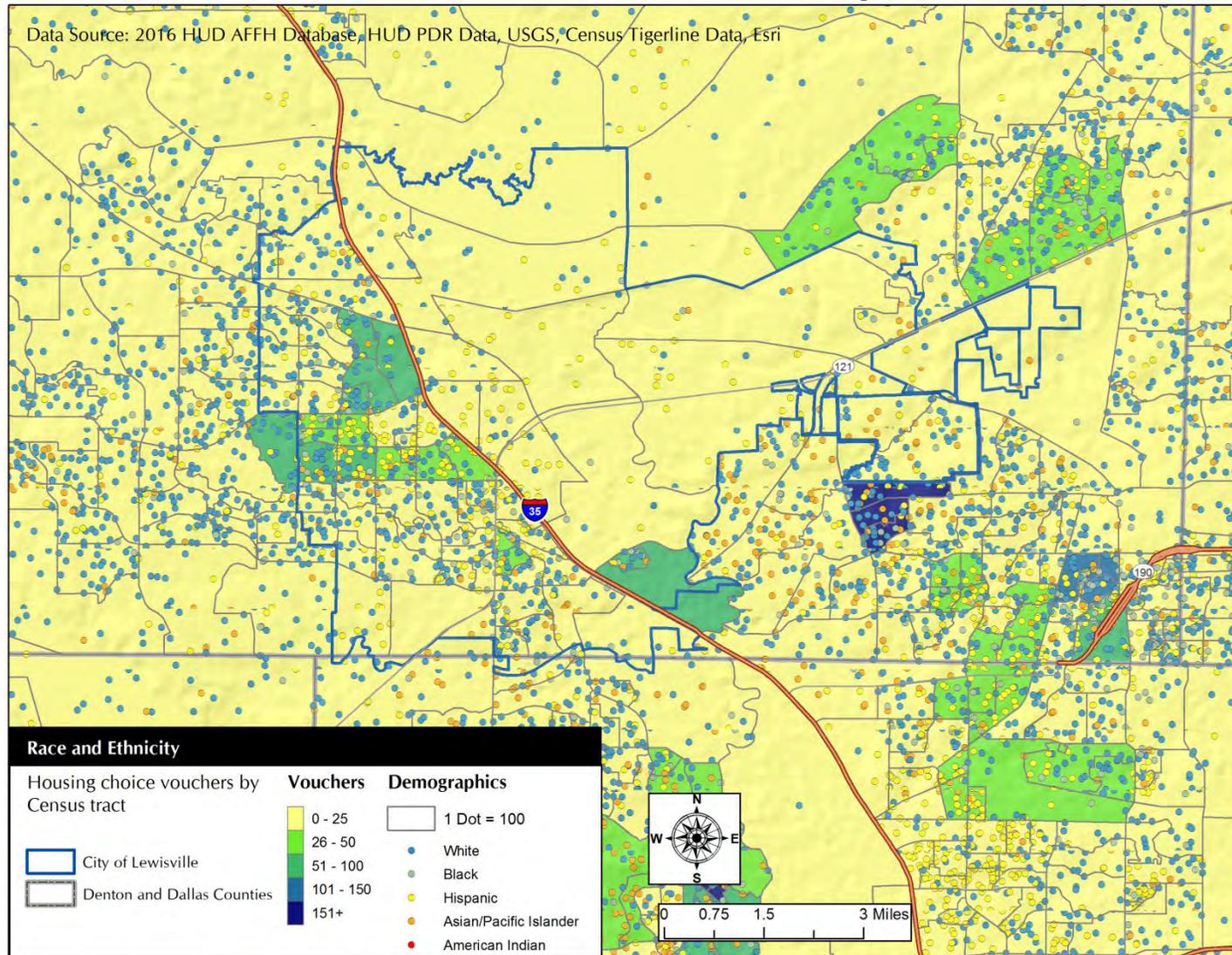
The publicly supported housing units are located in the south part of the city, as seen in Map IV.36. This areas also have a disproportionate concentration of Black households, as seen in Map IV.5. A different pattern is found with Vouchers, as shown in Map IV.37. Higher voucher use is located on the west side of the city.

**Map IV.36**  
**HUD AFFH Map 5 - Location of Public Housing Units**  
 Lewisville, Texas  
 2016 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline



**Map IV.37**  
**HUD AFFH Map 6 - Housing Choice Vouchers by Census Tract**  
 Lewisville, Texas

2016 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline



## Demographics of Publicly Assisted Housing Residents

### Age and Disability

Some 18.9 percent of publicly supported housing unit occupants were elderly, compared to the 6.5 percent of the elderly population as a whole. Similarly, the rate of residents that were disabled was almost 19.7 percent, compared to the estimated 8.4 percent total disabled population in 2014.

### Race and Ethnicity

As discussed previously, black residents reside in publicly supported housing at a rate higher than the jurisdiction average. All other racial and ethnic groups are underrepresented in publicly supported housing.

### Families with Children

Some 56.1 percent of households in HVC program housing were families with children.

**Table IV.35**  
**HUD AFFH Table 7 – R/ECAP and Non-R/ECAP Demographics by PSH**

Lewisville, Texas  
2016 HUD AFFH Database

**Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category**

Lewisville	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children
<b>Public Housing</b>								
R/ECAP tracts								
Non R/ECAP tracts								
<b>Project-based Section 8</b>								
R/ECAP tracts								
Non R/ECAP tracts								
<b>Other HUD Multifamily</b>								
R/ECAP tracts								
Non R/ECAP tracts	4							
<b>HCV Program</b>								
R/ECAP tracts								
Non R/ECAP tracts	384	18.87	19.68	22.06	59.60	14.90	3.44	56.06

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Note 2: Data Sources: APSH

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

### Differences in Occupancy by Race and Ethnicity

Data concerning the demographic composition of developments funded through Low-Income Housing Tax Credits are not available through HUD's AFFH Raw data or Low-Income Housing Tax Credit databases.

As noted previously, black households occupied publicly supported housing units at a higher rate than the jurisdiction average. Otherwise, there is no data to provide to suggest any differences in occupancy based on race and ethnicity, as seen in Table IV.36.

### ***Disparities in Access to Opportunity***

The location of publicly supported housing units did not differ widely from other areas in access to opportunity.

**Table IV.36**  
**HUD AFFH Table 8**  
**Demographics of Publicly Supported Housing Developments, by Program Category**  
 Lewisville, Texas  
 2016 HUD AFFH Database

Public Housing							
Location	Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
Lewisville	Community Options	6					

### ***Additional Information***

Public input noted that there is a concentration of affordable housing in certain areas in the City. This may limit access to certain opportunities throughout the City, such as proficient schools and transportation. The impact of zoning was also noted during public input as a factor contributing to the concentration of affordable housing in certain areas.

## **F. DISABILITY AND ACCESS ANALYSIS**

Persons with hearing, vision and cognitive disabilities are more highly concentrated west of I-35, as seen in Map IV.35. This pattern is also true for persons with ambulatory, self-care and independent living disabilities, as seen in Map IV.36.

**Table IV.37**  
**HUD AFFH Table 13- Disability by Type**  
 Lewisville, Texas  
 2016 HUD AFFH Database

Disability Type	Lewisville	
	#	%
Hearing difficulty	2,152	2.40
Vision difficulty	921	1.03
Cognitive difficulty	3,148	3.52
Ambulatory difficulty	3,584	4.00
Self-care difficulty	1,443	1.61
Independent living difficulty	2,384	2.66

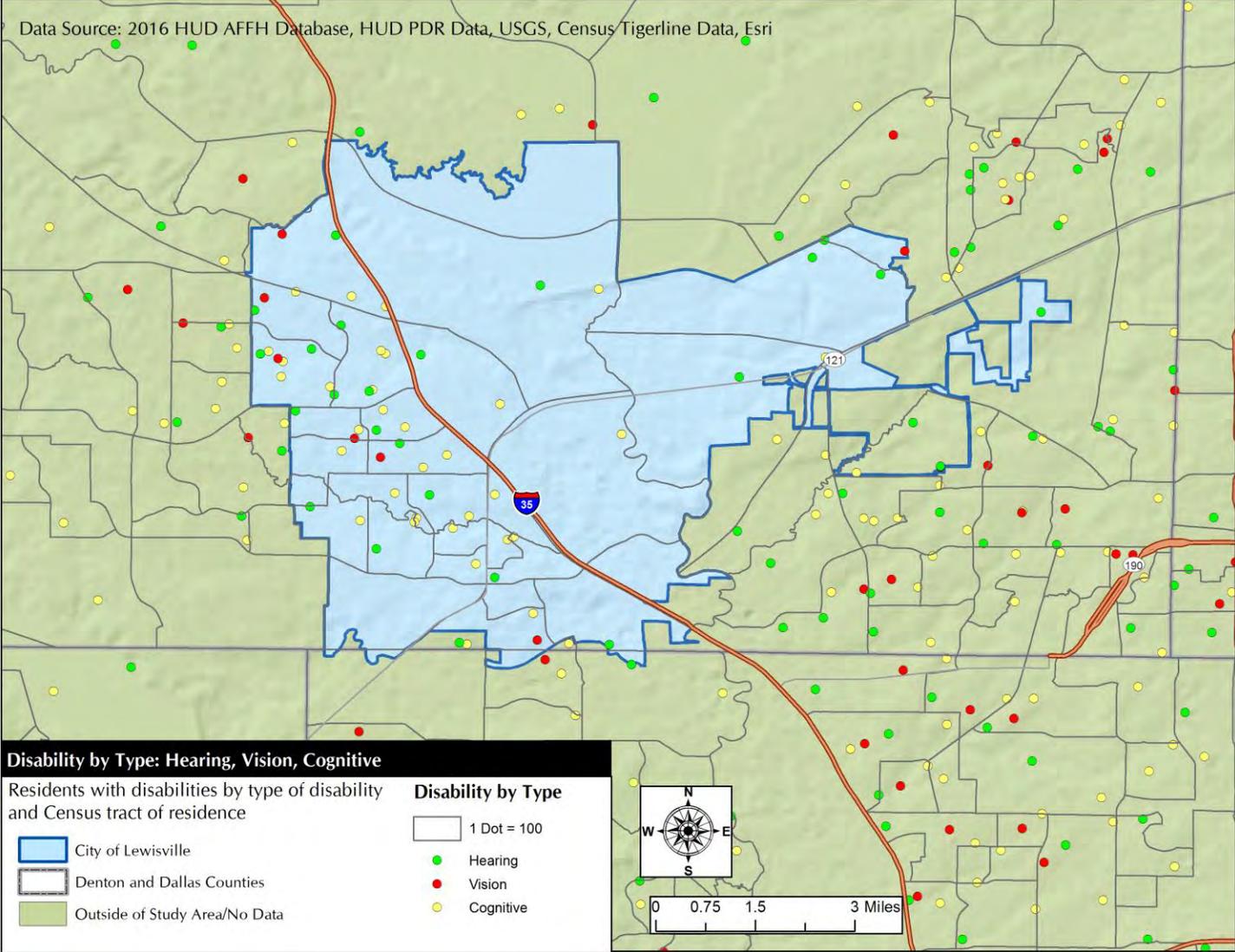
Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

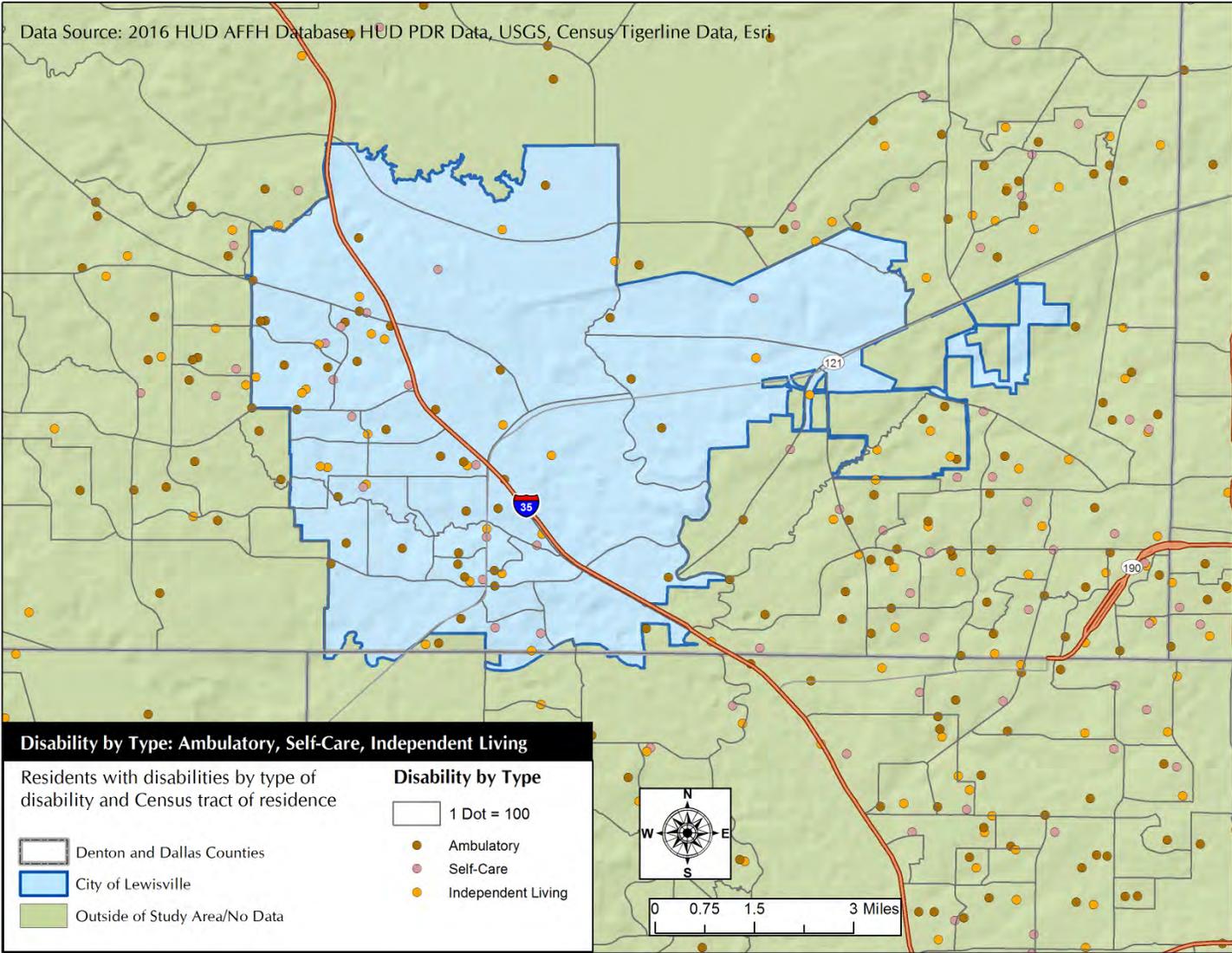
Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Persons with disabilities of all types are more heavily concentrated on the western and northern edges of the city, as seen in Map IV.38.

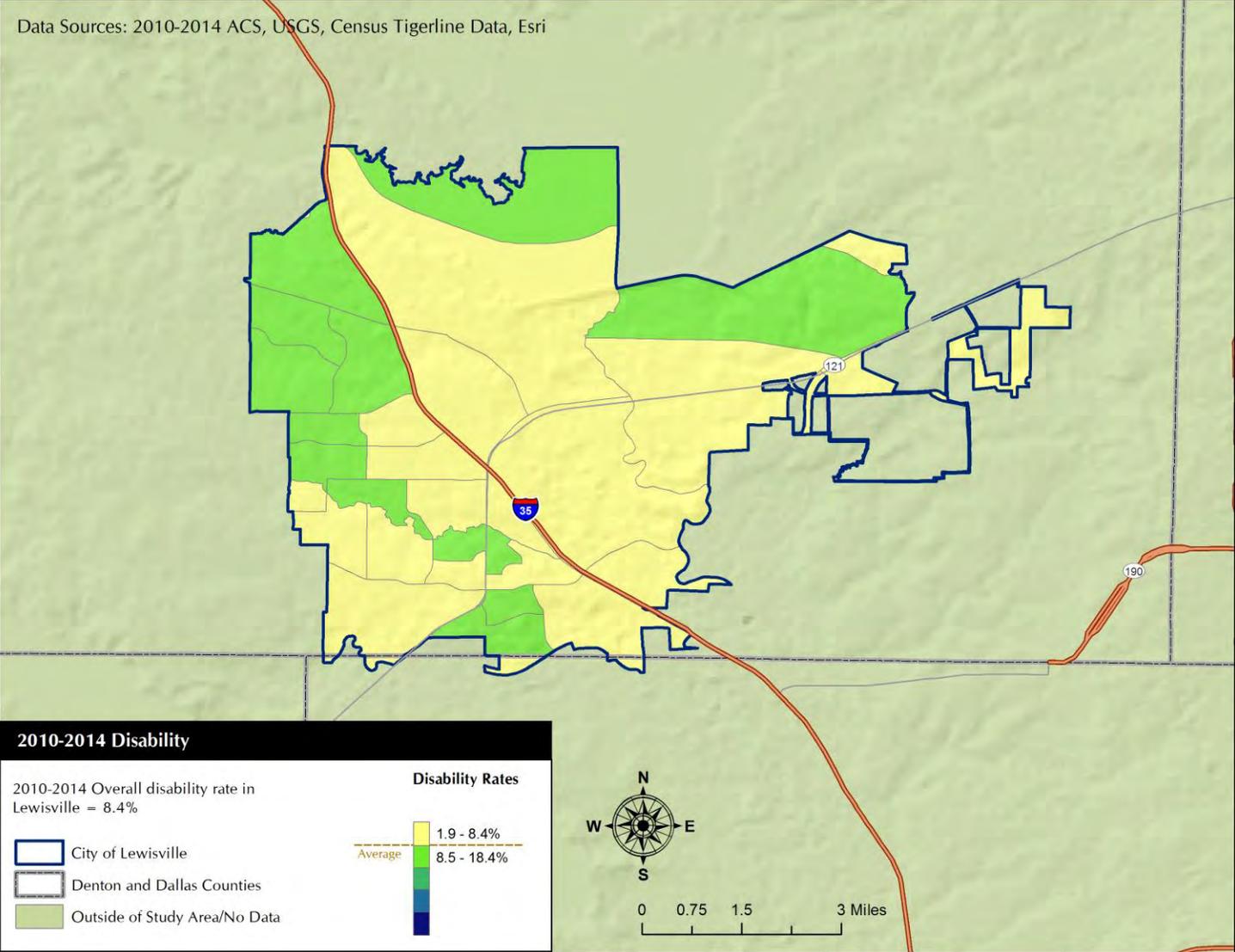
**Map IV.38**  
**HUD AFFH Map 16 - Disability by Type: Hearing, Vision, Cognitive**  
Lewisville, Texas  
2010-2014 ACS, HUD PDR Data, USGS, Census Tigerline



**Map IV.39**  
**HUD AFFH Map 16 - Disability by Type: Ambulatory, Self-Care, Independent Living**  
Lewisville, Texas  
2010-2014 ACS, HUD PDR Data, USGS, Census Tigerline



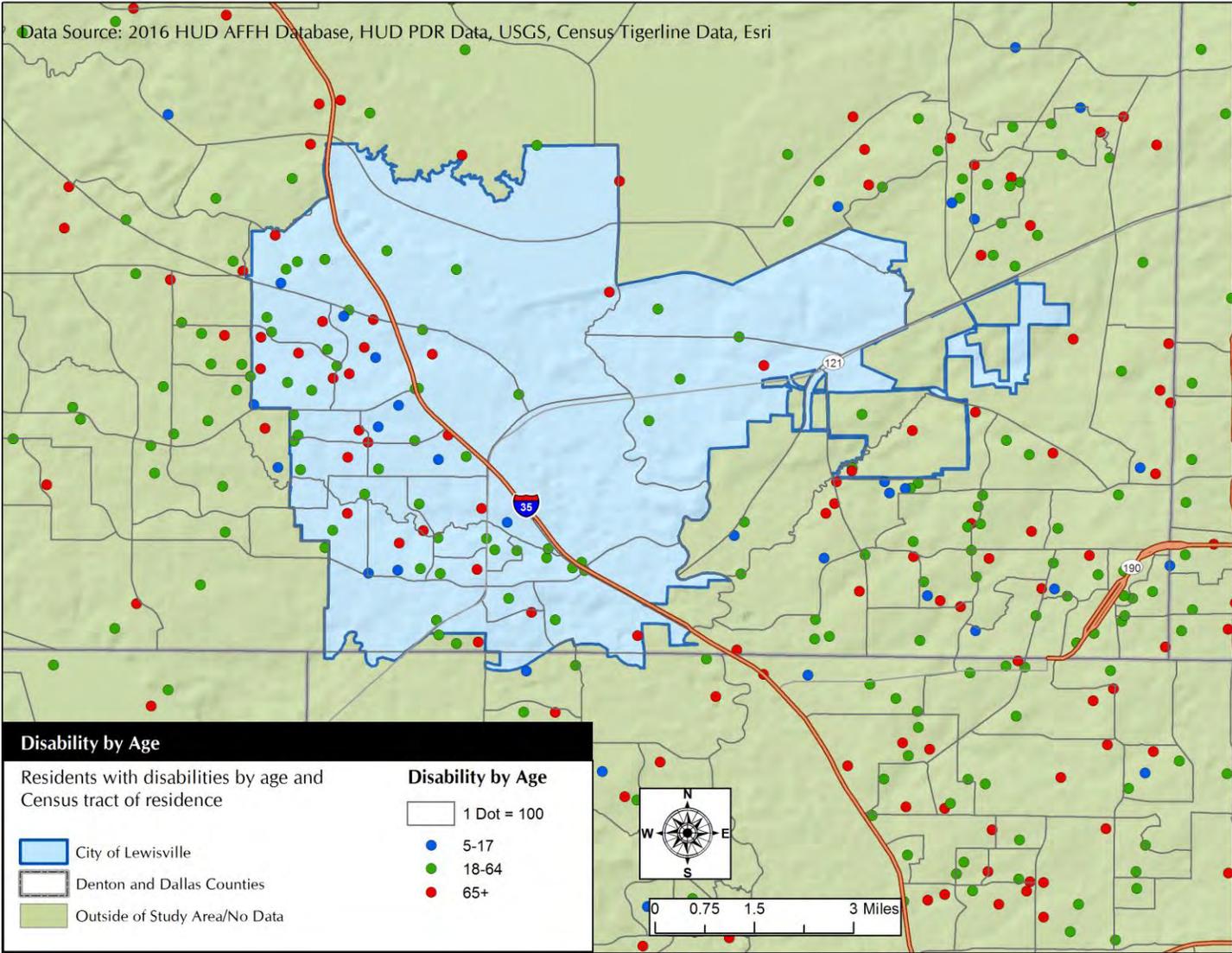
**Map IV.40**  
**2010-2014 Disability**  
Lewisville, Texas  
2010-2014 ACS, USGS, Census Tigerline



### Map IV.41 HUD AFFH Map 17 - Disability by Age

Lewisville, Texas

2010-2014 ACS, HUD PDR Data, USGS, Census Tigerline



## HOUSING ACCESSIBILITY

Accessible housing units are located throughout the City. However, many newer housing units are located outside city center areas. These newer housing units are more likely to have the mandatory minimum accessibility features.

Within the city, over 19 percent of the housing units in HCV Program units are utilized by disabled households.

**Table IV.38**  
**HUD AFFH Table 15 – Disability by Publicly Supported Housing**  
 Lewisville, Texas  
 2016 HUD AFFH Database

**Table 15 - Disability by Publicly Supported Housing Program Category**

Lewisville	People with a Disability*	
	#	%
Public Housing		
Project-Based Section 8		
Other Multifamily		
HCV Program	<b>73</b>	<b>19.68</b>

Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

As seen in Map IV.38, seen above, the concentration of disabled households does not correlate with higher concentrations of racial and ethnic minority households in the City.

There are services and housing available to disabled households in the City of Lewisville, and public input did not indicate additional need for services and affordable housing.

### Disparities in Access to Opportunity

#### Government services and facilities

Many government services and facilities are located within the city center. Access to these services is limited by the availability of public transportation. However, public transit use in these areas is higher than other parts of the city.

#### Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

As previously discussed, the highest concentration of disabled households are on the outer edges of the city, which corresponds with lower levels of sidewalk and pedestrian signal access.

#### Transportation

As previously discussed, the highest concentration of disabled households are on the outer edges of the city, which corresponds with area of lower levels of transit use.

#### Proficient schools and educational programs

Looking at Map IV.13, disabled households are located with higher concentrations in area with moderate quality school systems.

### Jobs

Much of the access to jobs is located in the eastern portion of the city, while many disabled households are located on the western end of the City. This may impact proximity to job opportunities. This is illustrated in Map IV.16.

### ***Requests for Accommodation***

In order to request reasonable accommodation, the disabled individual must contact the City government and the appropriate department. This can be done via phone, mail, email or fax.

### **Disproportionate Housing Needs**

While no data is available regarding the rate of housing problems for disabled households in the City of Lewisville, over 32 percent of households experience a housing problem in the City. As noted by public input, many disabled households have limited income. Households at lower income levels experience housing problems at rates even higher than the jurisdiction average.

### **Additional Information**

Fair Housing complaints from 2009 through 2016 show the most complaints for disability related issues. A total of 15 complaints were issued on the basis of disability over this timer period. Some 6 of these complaints were found to have cause, as shown in Table IV. 39.

**Table IV.39**  
**Fair Housing Complaints by Basis of Complaint Found with Cause**

City of Lewisville  
2008-2016 HUD Data

<b>Basis</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>Total</b>
Disability	.	.	1	2	1	.	2	.	.	6
Race	1	1	.	.	.	.	1	.	.	3
Family Status	.	.	.	1	.	.	.	.	.	1
Retaliation	1	.	.	.	.	.	.	.	.	1
<b>Total</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>1</b>	<b>.</b>	<b>3</b>	<b>.</b>	<b>.</b>	<b>11</b>
Total Complaints	1	1	1	3	1	.	2	.	.	9

**Table IV.40**  
**HUD AFFH Table 9 – Demographics of Households with Disproportional Needs**  
 Lewisville, Texas  
 2016 HUD AFFH Database

<b>Disproportionate Housing Needs</b>		<b>Lewisville</b>	
<b>Households experiencing any of 4 housing problems*</b>	<b># with problems</b>	<b># households</b>	<b>% with problems</b>
<b>Race/Ethnicity</b>			
White, Non-Hispanic	6,305	21,729	29.02
Black, Non-Hispanic	1,580	3,770	41.91
Hispanic	3,920	8,045	48.73
Asian or Pacific Islander, Non-Hispanic	910	2,359	38.58
Native American, Non-Hispanic	85	120	70.83
Other, Non-Hispanic	440	1,099	40.04
<i>Total</i>	13,235	37,135	35.64
<b>Household Type and Size</b>			
Family households, <5 people	5,665	19,345	29.28
Family households, 5+ people	2,240	3,940	56.85
Non-family households	5,335	13,845	38.53
<b>Households experiencing any of 4 Severe Housing Problems**</b>		<b># with severe problems</b>	<b>% with severe problems</b>
<b>Race/Ethnicity</b>			
White, Non-Hispanic	2,325	21,729	10.70
Black, Non-Hispanic	565	3,770	14.99
Hispanic	2,085	8,045	25.92
Asian or Pacific Islander, Non-Hispanic	540	2,359	22.89
Native American, Non-Hispanic	50	120	41.67
Other, Non-Hispanic	225	1,099	20.47
<i>Total</i>	5,800	37,135	15.62

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

Note 4: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

## G. FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, & RESOURCES

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### FEDERAL FAIR HOUSING LAWS

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).<sup>12</sup>

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.<sup>13</sup>

*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 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.

*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.

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<sup>12</sup> "HUD Fair Housing Laws and Presidential Executive Orders."

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/FHLaws](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws)

<sup>13</sup> "Title VIII: Fair Housing and Equal Opportunity."

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/progdesc/title8](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8)

*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.<sup>14</sup>

## STATE FAIR HOUSING LAWS

The Texas Fair Housing Law protects your right to rent an apartment, buy a home, obtain a mortgage, or purchase homeowners insurance free from discrimination based on:

- Race
- Color
- National Origin
- Religion
- Sex
- Familial Status, and
- Disability

The Texas Workforce Commission (TWC) is responsible for enforcing the Texas Fair Housing Law.<sup>15</sup>

### North Texas Fair Housing Center

The Fair Housing Center investigates complaints of housing discrimination in twelve counties in northern Texas, including Denton County.<sup>16</sup>

### The City of Lewisville

The City of Lewisville Grants Division receives fair housing complaints and makes referrals to HUD for enforcement. This agency is also responsible for conducting public education, training and outreach of fair housing rights and remedies in Lewisville. Education of the public regarding the rights and responsibilities afforded by fair housing law is an essential ingredient of fair housing enforcement. This includes outreach and education to the general public, landlords and tenants, housing and financial providers, as well as citizens, concerning fair housing and discrimination.

Regionally, the North Texas Fair Housing Center investigates fair housing complaints for the entirety of Northern Texas including the following counties: Collin, Dallas, Delta, Denton, Ellis, Hunt, Johnson, Kauffman, Parker, Rockwell, Tarrant, and Wise. Information is provided in both English and Spanish, and provides outreach and educations through fair housing workshops and training seminars.<sup>1</sup> Tarrant, Dallas, and Denton Counties direct complaints to the North Texas Fair Housing Center or to HUD in order to file violations. This information is provided in English on their websites, and in Spanish on the Dallas County website.

<sup>14</sup> "HUD Fair Housing Laws and Presidential Executive Orders."

<sup>15</sup> <https://www.tdhca.state.tx.us/fair-housing/>

<sup>16</sup> <http://www.northtexasfairhousing.org/housing-discrimination-complaints.html>

***Additional Information***

As noted in the public comments, there is an inability for certain subpopulations to access fair housing information and assistance. A lack of internet is one barrier to certain subpopulations. Another barrier is language. As noted for the Chin population in Lewisville, there is a language barrier to access information and be able to report any discrimination. There are a lack of resources to meet these needs in the region. Public input also noted the City's limited ability to address fair housing issues. The City is not empowered to investigate complaints, but would forward any complaints on to HUD.

## **SECTION V. FAIR HOUSING GOALS AND PRIORITIES**

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### **PURPOSE AND PROCESS**

The AFFH rule requires fair housing planning and describes the required elements of the fair housing planning process. The first step in the planning process is completing the fair housing analysis required in the AFH. The rule establishes specific requirements program participants must follow for developing and submitting an AFH and for incorporating and implementing that AFH into subsequent Consolidated Plans and Public Housing Agency (PHA) Plans. This process is intended help to connect housing and community development policy and investment planning with meaningful actions that affirmatively further fair housing.<sup>17</sup>

The introduction of the HUD's Assessment of Fair Housing tool (Assessment Tool) requires jurisdictions to submit their Fair Housing Assessments through an online User Interface. While this document is not that submittal, the Assessment Tool provides the organizational layout of this document.

### **AFH METHODOLOGY**

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

- Socio-economic and housing data from the U.S. Census Bureau, such as the 2010 Census and the 2010-2014 American Community Survey,
- 2008-2013 HUD CHAS data
- Employment data from the U.S. Bureau of Labor Statistics,
- Economic data from the U.S. Bureau of Economic Analysis,
- The 2016 HUD AFFH Database, which includes PHA data, disability information, and geographic distribution of topics
- Housing complaint data from HUD
- Home loan application data from the Home Mortgage Disclosure Act, and
- A variety of local data.

Qualitative research included evaluation of relevant existing fair housing research and fair housing legal cases. Additionally, this research included the evaluation of information gathered from many public input opportunities conducted in relation to this AFH, including the 2016 Fair Housing Survey, a series of fair housing forums, presentations, and the public review.

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, the City has identified a series of fair housing issues, and factors that contribute to the creation or persistence of those issues. The issues that the agency has studied relate to segregation and integration of racial and ethnic minorities, disproportionate housing needs; publicly supported housing location and

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<sup>17</sup> <https://www.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf>

occupancy; disparities in access to opportunity; disability and access; and fair housing enforcement, outreach, capacity, and resources.

Table V.1, below, provides a list of the factors that have been identified as contributing to these fair housing issues, and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice
2. Medium: Factors that have a less direct impact on fair housing choice, or that the City has a comparatively limited capacity to address
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the City has little capacity to address.

**Table I.1**  
**Fair Housing Contributing Factors and Priorities**

Contributing Factor	Priority	Discussion
Availability of Affordable Units in a Range of Sizes	Medium	There is a need for additional publicly assisted housing throughout the City. Racial or ethnic minority households are more likely to be experiencing a disproportionate need due to cost burdens, incomplete plumbing or kitchen facilities, or overcrowding. This contributing factor has been assigned a medium level of priority based on the extent of the need and the City's ability to respond to this need.
Access to financial services	High	The ability of residents throughout the City to secure home purchase loans varies according to the race and ethnicity of the loan applicant. This was identified in data gathered under the Home Mortgage Disclosure Act (HMDA). The City has designated efforts to address this factor to be of "high" priority.
Resistance to affordable housing	Medium	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, contributes to a lack of affordable housing in the City. Lack of affordable housing restricts the fair housing choice of City residents. The City has assigned this factor a priority of "medium".
Discriminatory actions in the market place	Medium	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, serves to limit the fair housing choice of residents with disabilities and racial/ethnic minority groups. The City has assigned this factor a priority of "medium".
Lack of understanding of fair housing law	High	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, contributes to discrimination and differential treatment in the housing market. Furthermore, a lack of understanding of fair housing law means that those who may suffer discrimination in the housing market do not know where to turn when they do. The City has assigned this factor a priority of "high".
Access to publicly supported housing for persons with disabilities	Medium	There is limited availability of publicly supported housing in the City for persons with disabilities, especially with access to transportation. The City has assigned this factor a priority of "medium."
Lack of affordable, accessible housing for seniors	High	The lack of affordable housing continues to be an issue City-wide, coupled with a growing senior population, culminates in a growing need for senior access to affordable housing. The City rates this factor as a "high" priority."
Lending Discrimination	Medium	As demonstrated by HMDA data, there is the presence of lending discrimination in the community, especially for minority populations. This impacts these communities' ability to access a variety of housing options, and the City rates this factor as a "medium" priority.
Private Discrimination	Medium	As seen throughout the public input process, there are instances of private discrimination in the marketplace, limited access for some protected classes to housing options in the City. The City rates this factor as a "medium" priority
Siting Selection Policies	High	City siting selection policies and zoning may negatively impact the development of affordable housing in the City of Lewisville. The City has assigned this as a "high" priority.
Practice and decisions for publicly supported housing	Medium	In addition to siting selection policies, the practice and decisions for publicly supported housing may not promote publicly supported housing within the City. This may limit the amount of new publicly supported housing developments in the City, and the City has assigned this factor as a "medium" priority.
Lack of quality health care for some racial minorities	Medium	Public input indicated a need for access to healthcare for the Chin community in Lewisville. As the Chin population continues to grow, access to health care and other social services has been an on-going issue. The City rates this as a "medium" priority.

Ultimately, a concluding list of prospective fair housing issues were drawn from these sources and along with the fair housing contributing factors, a set of actions have been identified, milestones and resources are being suggested, and responsible parties have been identified.

All of these have been summarized by selected fair housing goals. Each of these issues are presented in the table presented on the following pages.

The AFH development process will conclude with a thirty-day public review period of the draft AFH. Specific narratives and maps, along with the entirety of this report created in the AFFH Assessment Tool, will be submitted to HUD via the on-line portal on or before January 4, 2017.

## **OVERVIEW OF FINDINGS**

The following table summarizes the fair housing goals, fair housing issues and contributing factors, as identified by the Assessment of Fair Housing. It includes metrics and milestones, and a timeframe for achievements as well as designating a responsible agency.

**Table I.2**  
**City of Lewisville Fair Housing Goals, Issues, and Proposed Achievements**

2017 – 2021 Assessment of Fair Housing

Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
<b>Enhance understanding of fair housing and fair housing law</b>	Resistance to affordable housing Discriminatory actions in the market place Lack of understanding of where to turn	Discriminatory terms and conditions in Rental Failure to make reasonable accommodation	One seminar, training, or outreach event each year	City of Lewisville
<b>Discussion:</b> Public input and stakeholder comments revealed that there is additional need for fair housing outreach and trainings. Housing complaint data registered many complaints based upon failure to make reasonable accommodation. City Staff will speak at a Greater Lewisville Association of Realtors (GLAR) meeting to discuss Fair Housing annually. Flyers regarding Fair Housing will be provided to Mobilizing Area Resources to You (MARTY), which is deployed around Lewisville to bring City Hall out into the community. City Staff will speak annually at a Neighbors Leading Neighbors quarterly meeting, which is a public education session for leaders within the community, about Fair Housing. The City website will also be enhanced to include more information on Fair Housing.				
<b>Promote the development of accessible and affordable housing</b>	Access to financial Services Availability of affordable units in a range of sizes Access to publicly supported housing for persons with disabilities Lack of affordable, accessible housing for seniors	Limited access to financial services Limited affordable housing, especially for minorities and seniors	Fund housing rehabilitation for 10 units by the year 2021-2022.	City of Lewisville
<b>Discussion:</b> The City of Lewisville has an increasing number of households with housing problems, especially cost burdens. While it impacts 29.0 percent of white households, over 41 percent of black households and 48 percent of Hispanic households experience housing problems. In addition, based on public input and stakeholder feedback, seniors and residents with disabilities face limitations in the supply of accessible, affordable housing. The number of housing units available to all income levels are limited, as shown by the high level of cost burden within the City. Promoting the rehabilitation of housing options accessible to a range of income levels will help alleviate the restriction in access to housing throughout the City.				
<b>Enhance financial literacy and promote equitable access to credit and home lending</b>	Lending Discrimination Private discrimination Access to financial services	Disproportionate high denial rates for racial and ethnic minorities Lack of understanding of credit and mortgage application process	One seminar, trainings, or outreach event each year	City of Lewisville
<b>Discussion:</b> Denial rates for owner-occupied home purchases varied by the race/ethnicity of the applicant. Denial rates for Hispanic households were over twelve percentage points higher than for white applicants. Enhancing financial literacy through seminars and trainings, as well as partnerships with outside agencies is one step that the City of Lewisville will take to ensure financial literacy is not a hurdle that households continue to face. City Staff will speak annually at a Neighbors Leading Neighbors quarterly meeting, which is a public education session for leaders within the community, about Fair Housing. The City website will also be enhanced to include more information on Fair Housing.				
<b>Review and Revise Local Land use Policies</b>	Resistance to affordable housing Siting selection policies Practices and decisions for publicly supported housing	Resistance to affordable housing Prospective discriminatory practices and policies NIMBYism Availability of affordable units in a range of sizes	Conduct a review of land use policies and regulations by 2021-22	City of Lewisville
<b>Discussion:</b> The availability of housing accessible to a variety of income levels and protected classed may be limited by zoning and other local policies that limit the production of affordable units. Review of local land use policies may positively impact the placement and access of publicly supported and affordable housing. The availability of units in a range of sizes may be limited by the current zoning practices. The City of Lewisville has not revised zoning and development policies since the 1970's. The City will be conducting small area plans with community engagement for two pilot areas in 2017. Once this pilot program is finished the City will complete a rewrite of our zoning and development code regulations.				
<b>Enhance fair housing</b>	Discriminatory actions in the market place	Discriminatory terms,	Reach out to North Texas	City of Lewisville

<b>enforcement and reduce market discrimination</b>	Lack of understanding of where to turn for fair housing Lack of knowledge of fair housing law Resistance to affordable housing	conditions, or privileges relating to rental	Fair Housing Center to: 1) Provide outreach and education on a yearly basis; and, 2) Provide fair housing seminars, at least bi-annually
<b>Discussion:</b> Input received from the 2016 Fair Housing Survey, as well as testimony received at the public engagement activities, demonstrated that while the organizational infrastructure is in place and available, many people still do not use the fair housing system.			
<b>Enhance community access to vital health and social services</b>	Resistance to affordable housing Lack of quality health care for some racial minorities	Disparities in Access to Opportunity Access to healthy neighborhoods	Fund promotion of increased access to social and health services throughout City each year City of Lewisville
<b>Discussion:</b> As demonstrated by public input, as well as demonstrated by the access to opportunities discussion, households within the City of Lewisville have limited access to some vital services. The Chin population in the City of Lewisville has grown significantly in recent years. This community, in particular, has limited access to health services in the City. The City will fund a health services project during the 2017 Plan Year with CDBG funds. Additionally, the City will make efforts to increase access for minority populations, seniors, and other at-need groups to services, especially in areas where public transportation limits mobility. The City will review applications for CDBG social service funding options that enhance access to health and social services, and use CDBG funds to improve access to such services throughout the next five years.			

## SECTION VI. APPENDICES

### A. HMDA AND HOUSING COMPLAINT DATA

**Table A.1**  
**Purpose of Loan by Year**

City of Lewisville  
2008–2015 HMDA Data

Purpose	2008	2009	2010	2011	2012	2013	2014	2015	Total
Home Purchase	2,874	2,871	2,384	1,993	2,133	2,346	2,180	2,367	19,148
Home Improvement	396	206	154	189	167	143	182	184	1,621
Refinancing	1,972	3,261	3,164	3,231	3,089	2,603	1,223	1,764	20,307
<b>Total</b>	<b>5,242</b>	<b>6,338</b>	<b>5,702</b>	<b>5,413</b>	<b>5,389</b>	<b>5,092</b>	<b>3,585</b>	<b>4,315</b>	<b>41,076</b>

**Table A.2**  
**Occupancy Status for Home Purchase Loan Applications**

City of Lewisville  
2008–2015 HMDA Data

Status	2008	2009	2010	2011	2012	2013	2014	2015	Total
Owner-Occupied	2,668	2,760	2,265	1,852	1,964	2,125	1,955	2,141	17,730
Not Owner-Occupied	204	109	114	137	162	208	220	215	1,369
Not Applicable	2	2	5	4	7	13	5	11	49
<b>Total</b>	<b>2,874</b>	<b>2,871</b>	<b>2,384</b>	<b>1,993</b>	<b>2,133</b>	<b>2,346</b>	<b>2,180</b>	<b>2,367</b>	<b>19,148</b>

**Table A.3**  
**Owner-Occupied Home Purchase Loan Applications by Loan Type**

City of Lewisville  
2008–2015 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	Total
Conventional	1,666	1,389	1,136	855	933	1,222	1,215	1,315	9,731
FHA - Insured	911	1,246	1,037	879	901	743	613	677	7,007
VA - Guaranteed	91	125	92	118	128	159	127	148	988
Rural Housing Service or Farm Service Agency	0	0	0	0	2	1	0	1	4
<b>Total</b>	<b>2,668</b>	<b>2,760</b>	<b>2,265</b>	<b>1,852</b>	<b>1,964</b>	<b>2,125</b>	<b>1,955</b>	<b>2,141</b>	<b>17,730</b>

### DENIAL RATES

**Table A.4**  
**Loan Applications by Action Taken**

City of Lewisville  
2008–2015 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	2015	Total
Loan Originated	1,286	1,154	1,004	854	955	1,096	1,035	1,179	8,563
Application Approved but not Accepted	131	70	133	58	88	53	70	56	659
Application Denied	230	145	201	159	180	162	130	133	1,340
Application Withdrawn by Applicant	165	136	128	103	124	178	181	186	1,201
File Closed for Incompleteness	26	29	18	20	14	35	17	41	200
Loan Purchased by the Institution	815	1,210	781	658	602	601	522	546	5,735
Preapproval Request Denied	8	13	0	0	0	0	0	0	21
Preapproval Approved but not Accepted	7	3	0	0	1	0	0	0	11
<b>Total</b>	<b>2,668</b>	<b>2,760</b>	<b>2,265</b>	<b>1,852</b>	<b>1,964</b>	<b>2,125</b>	<b>1,955</b>	<b>2,141</b>	<b>17,730</b>
<b>Denial Rate</b>	<b>15.2%</b>	<b>11.2%</b>	<b>16.7%</b>	<b>15.7%</b>	<b>15.9%</b>	<b>12.9%</b>	<b>11.2%</b>	<b>10.1%</b>	<b>13.5%</b>

**Table A.5**  
**Loan Applications by Reason for Denial**

City of Lewisville  
2008–2015 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	2013	2014	2015	Total
Debt-to-Income Ratio	25	30	47	33	51	38	16	15	255
Employment History	4	1	6	4	6	4	3	3	31
Credit History	39	22	19	42	44	31	12	18	227
Collateral	24	13	8	10	12	12	11	16	106
Insufficient Cash	10	4	1	5	1	5	6	2	34
Unverifiable Information	18	10	2	9	9	4	5	4	61
Credit Application Incomplete	17	18	23	11	19	19	11	11	129
Mortgage Insurance Denied	0	0	0	1	0	0	0	0	1
Other	16	7	19	10	16	9	11	10	98
Missing	77	40	76	34	22	40	55	54	398
<b>Total</b>	<b>230</b>	<b>145</b>	<b>201</b>	<b>159</b>	<b>180</b>	<b>162</b>	<b>130</b>	<b>133</b>	<b>1,340</b>

**Table A.6**  
**Denial Rates by Race/Ethnicity of Applicant**

City of Lewisville  
2004–2015 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	Average
American Indian	12.5%	28.6%	69.2%	20.0%	50.0%	33.3%	.0%	11.1%	32.1%
Asian	25.3%	12.8%	19.2%	16.2%	20.0%	9.8%	12.0%	8.9%	15.1%
Black	14.9%	12.7%	11.5%	21.2%	14.3%	21.3%	14.7%	13.8%	15.5%
White	13.0%	10.6%	15.3%	12.8%	12.9%	11.1%	10.4%	9.5%	11.9%
Not Available	20.7%	12.3%	19.6%	28.1%	32.2%	24.2%	13.9%	13.1%	20.8%
Not Applicable	%	0.0%	0%	%	%	%	%	%	.0%
<b>Average</b>	<b>15.2%</b>	<b>11.2%</b>	<b>16.7%</b>	<b>15.7%</b>	<b>15.9%</b>	<b>12.9%</b>	<b>11.2%</b>	<b>10.1%</b>	<b>13.5%</b>
Non-Hispanic	13.5%	8.6%	13.1%	12.1%	11.2%	10.1%	9.3%	8.9%	10.8%
Hispanic	20.6%	23.8%	28.1%	26.7%	26.4%	23.8%	20.5%	14.9%	23.0%

**Table A.7**  
**Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant**  
 City of Lewisville  
 2008–2015 HMDA Data

<b>Race</b>		<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>Total</b>
American Indian	Originated	7	5	4	4	2	4	4	8	38
	Denied	1	2	9	1	2	2	0	1	18
	Denial Rate	12.5%	28.6%	69.2%	20.0%	50.0%	33.3%	.0%	11.1%	32.1%
Asian	Originated	124	136	139	98	92	165	147	184	1,085
	Denied	42	20	33	19	23	18	20	18	193
	Denial Rate	25.3%	12.8%	19.2%	16.2%	20.0%	9.8%	12.0%	8.9%	15.1%
Black	Originated	63	55	46	41	42	59	58	94	458
	Denied	11	8	6	11	7	16	10	15	84
	Denial Rate	14.9%	12.7%	11.5%	21.2%	14.3%	21.3%	14.7%	13.8%	15.5%
White	Originated	973	864	729	614	737	777	727	787	6,208
	Denied	145	102	132	90	109	97	84	83	842
	Denial Rate	13.0%	10.6%	15.3%	12.8%	12.9%	11.1%	10.4%	9.5%	11.9%
Not Available	Originated	119	93	86	97	82	91	99	106	773
	Denied	31	13	21	38	39	29	16	16	203
	Denial Rate	20.7%	12.3%	19.6%	28.1%	32.2%	24.2%	13.9%	13.1%	20.8%
Not Applicable	Originated	0	1	0	0	0	0	0	0	1
	Denied	0	0	0	0	0	0	0	0	0
	Denial Rate	%	.0%	%	%	%	%	%	%	.0%
<b>Total</b>	<b>Originated</b>	<b>1,286</b>	<b>1,154</b>	<b>1,004</b>	<b>854</b>	<b>955</b>	<b>1,096</b>	<b>1,035</b>	<b>1,179</b>	<b>8,563</b>
	<b>Denied</b>	<b>230</b>	<b>145</b>	<b>201</b>	<b>159</b>	<b>180</b>	<b>162</b>	<b>130</b>	<b>133</b>	<b>1,340</b>
	<b>Denial Rate</b>	<b>15.2%</b>	<b>11.2%</b>	<b>16.7%</b>	<b>15.7%</b>	<b>15.9%</b>	<b>12.9%</b>	<b>11.2%</b>	<b>10.1%</b>	<b>13.5%</b>
Non-Hispanic	Originated	971	935	753	669	727	891	810	909	6,665
	Denied	152	88	114	92	92	100	83	89	810
	Denial Rate	13.5%	8.6%	13.1%	12.1%	11.2%	10.1%	9.3%	8.9%	10.8%
Hispanic	Originated	196	128	166	99	145	115	136	166	1,151
	Denied	51	40	65	36	52	36	35	29	344
	Denial Rate	20.6%	23.8%	28.1%	26.7%	26.4%	23.8%	20.5%	14.9%	23.0%

**Table A.8**  
**Loan Applications by Reason for Denial by Race/Ethnicity of Applicant**

City of Lewisville  
 2008–2015 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	4	43	22	138	48	0	255	75
Employment History	0	6	2	20	3	0	31	3
Credit History	4	18	25	142	38	0	227	54
Collateral	2	14	4	76	10	0	106	13
Insufficient Cash	0	6	1	23	4	0	34	7
Unverifiable Information	1	16	2	34	8	0	61	10
Credit Application Incomplete	1	22	5	80	21	0	129	20
Mortgage Insurance Denied	0	1	0	0	0	0	1	0
Other	1	23	3	54	17	0	98	25
Missing	5	44	20	275	54	0	398	137
<b>Total</b>	<b>18</b>	<b>193</b>	<b>84</b>	<b>842</b>	<b>203</b>	<b>0</b>	<b>1,340</b>	<b>344</b>
% Missing	27.8%	22.8%	23.8%	32.7%	26.6%	%	29.7%	39.8%

**Table A.9**  
**Denial Rates by Gender of Applicant**

City of Lewisville  
 2008–2015 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	13.3%	18.3%	17.1%	33.3%	15.2%
2009	10.6%	12.3%	10.8%	.0%	11.2%
2010	16.4%	16.6%	20.0%	%	16.7%
2011	15.4%	15.8%	18.3%	%	15.7%
2012	15.5%	14.6%	26.1%	%	15.9%
2013	11.1%	16.5%	14.3%	%	12.9%
2014	10.5%	12.4%	12.7%	%	11.2%
2015	9.4%	11.0%	12.8%	%	10.1%
<b>Average</b>	<b>12.6%</b>	<b>14.8%</b>	<b>16.5%</b>	<b>25.0%</b>	<b>13.5%</b>

**Table A.10**  
**Loan Applications by Selected Action Taken by Gender of Applicant**

City of Lewisville  
 2008–2015 HMDA Data

Gender		2008	2009	2010	2011	2012	2013	2014	2015	Total
Male	Originated	811	724	630	522	588	723	668	739	5,405
	Denied	124	86	124	95	108	90	78	77	782
	Denial Rate	13.3%	10.6%	16.4%	15.4%	15.5%	11.1%	10.5%	9.4%	12.6%
Female	Originated	405	371	326	283	316	319	312	372	2,704
	Denied	91	52	65	53	54	63	44	46	468
	Denial Rate	18.3%	12.3%	16.6%	15.8%	14.6%	16.5%	12.4%	11.0%	14.8%
Not Available	Originated	68	58	48	49	51	54	55	68	451
	Denied	14	7	12	11	18	9	8	10	89
	Denial Rate	17.1%	10.8%	20.0%	18.3%	26.1%	14.3%	12.7%	12.8%	16.5%
Not Applicable	Originated	2	1	0	0	0	0	0	0	3
	Denied	1	0	0	0	0	0	0	0	1
	Denial Rate	33.3%	.0%	%	%	%	%	%	%	25.0%
<b>Total</b>	<b>Originated</b>	<b>1,286</b>	<b>1,154</b>	<b>1,004</b>	<b>854</b>	<b>955</b>	<b>1,096</b>	<b>1,035</b>	<b>1,179</b>	<b>8,563</b>
	<b>Denied</b>	<b>230</b>	<b>145</b>	<b>201</b>	<b>159</b>	<b>180</b>	<b>162</b>	<b>130</b>	<b>133</b>	<b>1,340</b>
	<b>Denial Rate</b>	<b>15.2%</b>	<b>11.2%</b>	<b>16.7%</b>	<b>15.7%</b>	<b>15.9%</b>	<b>12.9%</b>	<b>11.2%</b>	<b>10.1%</b>	<b>13.5%</b>

**Table A.11**  
**Denial Rates by Income of Applicant**

City of Lewisville  
 2008–2015 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	Total
\$15,000 or Below	66.7%	71.4%	60.0%	66.7%	83.3%	100.0%	100.0%	66.7%	72.7%
\$15,001–\$30,000	29.9%	31.8%	41.4%	35.9%	41.0%	32.3%	40.4%	39.4%	36.6%
\$30,001–\$45,000	19.3%	12.0%	22.2%	26.5%	23.4%	14.0%	17.0%	17.5%	19.1%
\$45,001–\$60,000	16.0%	10.1%	15.7%	12.7%	14.3%	12.0%	9.2%	9.1%	12.5%
\$60,001–\$75,000	15.2%	11.3%	10.0%	13.2%	12.5%	8.6%	6.0%	8.7%	10.8%
Above \$75,000	11.2%	7.6%	10.1%	9.6%	6.7%	11.9%	8.8%	7.4%	9.3%
Data Missing	10.5%	27.3%	33.3%	30.0%	35.7%	14.3%	27.8%	13.3%	22.7%
<b>Total</b>	<b>15.2%</b>	<b>11.2%</b>	<b>16.7%</b>	<b>15.7%</b>	<b>15.9%</b>	<b>12.9%</b>	<b>11.2%</b>	<b>10.1%</b>	<b>13.5%</b>

**Table A.12**  
**Loan Applications by Income of Applicant: Originated and Denied**

City of Lewisville  
 2008–2015 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	Total
\$15,000 or Below	Loan Originated	1	2	2	2	1	0	0	1	9
	Application Denied	2	5	3	4	5	2	1	2	24
	Denial Rate	66.7%	71.4%	60.0%	66.7%	83.3%	100.0%	100.0%	66.7%	72.7%
\$15,001–\$30,000	Loan Originated	61	45	68	41	49	42	28	20	354
	Application Denied	26	21	48	23	34	20	19	13	204
	Denial Rate	29.9%	31.8%	41.4%	35.9%	41.0%	32.3%	40.4%	39.4%	36.6%
\$30,001–\$45,000	Loan Originated	197	169	161	119	177	154	127	127	1,231
	Application Denied	47	23	46	43	54	25	26	27	291
	Denial Rate	19.3%	12.0%	22.2%	26.5%	23.4%	14.0%	17.0%	17.5%	19.1%
\$45,001–\$60,000	Loan Originated	215	258	204	185	216	213	177	219	1,687
	Application Denied	41	29	38	27	36	29	18	22	240
	Denial Rate	16.0%	10.1%	15.7%	12.7%	14.3%	12.0%	9.2%	9.1%	12.5%
\$60,001–\$75,000	Loan Originated	217	189	144	132	140	170	173	190	1,355
	Application Denied	39	24	16	20	20	16	11	18	164
	Denial Rate	15.2%	11.3%	10.0%	13.2%	12.5%	8.6%	6.0%	8.7%	10.8%
Above \$75,000	Loan Originated	578	483	419	368	363	505	517	609	3,842
	Application Denied	73	40	47	39	26	68	50	49	392
	Denial Rate	11.2%	7.6%	10.1%	9.6%	6.7%	11.9%	8.8%	7.4%	9.3%
Data Missing	Loan Originated	17	8	6	7	9	12	13	13	85
	Application Denied	2	3	3	3	5	2	5	2	25
	Denial Rate	10.5%	27.3%	33.3%	30.0%	35.7%	14.3%	27.8%	13.3%	22.7%
<b>Total</b>	<b>Loan Originated</b>	<b>1,286</b>	<b>1,154</b>	<b>1,004</b>	<b>854</b>	<b>955</b>	<b>1,096</b>	<b>1,035</b>	<b>1,179</b>	<b>8,563</b>
	<b>Application Denied</b>	<b>230</b>	<b>145</b>	<b>201</b>	<b>159</b>	<b>180</b>	<b>162</b>	<b>130</b>	<b>133</b>	<b>1,340</b>
	<b>Denial Rate</b>	<b>15.2%</b>	<b>11.2%</b>	<b>16.7%</b>	<b>15.7%</b>	<b>15.9%</b>	<b>12.9%</b>	<b>11.2%</b>	<b>10.1%</b>	<b>13.5%</b>

**Table A.13**  
**Denial Rates of Loans by Race/Ethnicity and Income of Applicant**

City of Lewisville  
 2008–2015 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	%	75.0%	27.3%	9.1%	22.2%	35.3%	%	32.1%
Asian	100.0%	34.1%	10.8%	13.1%	17.1%	14.8%	30.0%	15.1%
Black	100.0%	66.7%	25.4%	14.0%	10.0%	10.7%	20.0%	15.5%
White	66.7%	32.2%	18.2%	11.8%	8.1%	7.4%	13.4%	11.9%
Not Available	71.4%	63.6%	38.2%	15.3%	20.0%	12.6%	44.4%	20.8%
Not Applicable	%	%	%	%	%	%	.0%	.0%
<b>Average</b>	<b>72.7%</b>	<b>36.6%</b>	<b>19.1%</b>	<b>12.5%</b>	<b>10.8%</b>	<b>9.3%</b>	<b>22.7%</b>	<b>13.5%</b>
Non-Hispanic	76.5%	32.5%	14.2%	10.8%	9.0%	8.8%	12.7%	10.8%
Hispanic	66.7%	35.7%	27.7%	19.1%	13.6%	9.7%	46.2%	23.0%

**Table A.14**  
**Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied**

City of Lewisville  
 2008–2015 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	0	2	8	10	7	11	0	38
	Application Denied	0	6	3	1	2	6	0	18
	Denial Rate	%	75.0%	27.3%	9.1%	22.2%	35.3%	%	32.1%
Asian	Loan Originated	0	27	166	219	175	491	7	1,085
	Application Denied	2	14	20	33	36	85	3	193
	Denial Rate	100.0%	34.1%	10.8%	13.1%	17.1%	14.8%	30.0%	15.1%
Black	Loan Originated	0	6	47	111	99	191	4	458
	Application Denied	3	12	16	18	11	23	1	84
	Denial Rate	100.0%	66.7%	25.4%	14.0%	10.0%	10.7%	20.0%	15.5%
White	Loan Originated	7	303	942	1,192	946	2,760	58	6,208
	Application Denied	14	144	210	160	83	222	9	842
	Denial Rate	66.7%	32.2%	18.2%	11.8%	8.1%	7.4%	13.4%	11.9%
Not Available	Loan Originated	2	16	68	155	128	389	15	773
	Application Denied	5	28	42	28	32	56	12	203
	Denial Rate	71.4%	63.6%	38.2%	15.3%	20.0%	12.6%	44.4%	20.8%
Not Applicable	Loan Originated	0	0	0	0	0	0	1	1
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	%	%	%	%	%	%	.0%	.0%
<b>Total</b>	<b>Loan Originated</b>	<b>9</b>	<b>354</b>	<b>1,231</b>	<b>1,687</b>	<b>1,355</b>	<b>3,842</b>	<b>85</b>	<b>8,563</b>
	<b>Application Denied</b>	<b>24</b>	<b>204</b>	<b>291</b>	<b>240</b>	<b>164</b>	<b>392</b>	<b>25</b>	<b>1,340</b>
	<b>Denial Rate</b>	<b>72.7%</b>	<b>36.6%</b>	<b>19.1%</b>	<b>12.5%</b>	<b>10.8%</b>	<b>9.3%</b>	<b>22.7%</b>	<b>13.5%</b>
Non-Hispanic	Loan Originated	4	154	837	1,320	1,103	3,185	62	6,665
	Application Denied	13	74	138	160	109	307	9	810
	Denial Rate	76.5%	32.5%	14.2%	10.8%	9.0%	8.8%	12.7%	10.8%
Hispanic	Loan Originated	3	187	327	229	127	271	7	1,151
	Application Denied	6	104	125	54	20	29	6	344
	Denial Rate	66.7%	35.7%	27.7%	19.1%	13.6%	9.7%	46.2%	23.0%

## PREDATORY LENDING

**Table A.15**  
**Originated Owner-Occupied Loans by HAL Status**

City of Lewisville  
2008–2015 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	Total
Other	1,128	1,084	952	819	887	1,077	1,011	1,155	8,113
HAL	158	70	52	35	68	19	24	24	450
<b>Total</b>	<b>1,286</b>	<b>1,154</b>	<b>1,004</b>	<b>854</b>	<b>955</b>	<b>1,096</b>	<b>1,035</b>	<b>1,179</b>	<b>8,563</b>
Percent HAL	12.3%	6.1%	5.2%	4.1%	7.1%	1.7%	2.3%	2.0%	5.3%

**Table A.16**  
**Loans by Loan Purpose by HAL Status**

City of Lewisville  
2008–2015 HMDA Data

Loan Purpose		2008	2009	2010	2011	2012	2013	2014	2015	Total
Home Purchase	Other	1,128	1,084	952	819	887	1,077	1,011	1,155	8,113
	HAL	158	70	52	35	68	19	24	24	450
	Percent HAL	12.3%	6.1%	5.2%	4.1%	7.1%	1.7%	2.3%	2.0%	5.3%
Home Improvement	Other	126	54	59	46	39	56	64	71	515
	HAL	11	8	4	7	4	3	7	4	48
	Percent HAL	8.0%	12.9%	6.3%	13.2%	9.3%	5.1%	9.9%	5.3%	8.5%
Refinancing	Other	569	1,365	1,429	1,433	1,404	1,115	529	760	8,604
	HAL	71	72	15	12	8	8	5	1	192
	Percent HAL	11.1%	5.0%	1.0%	.8%	.6%	.7%	.9%	.1%	2.2%
<b>Total</b>	<b>Other</b>	<b>1,823</b>	<b>2,503</b>	<b>2,440</b>	<b>2,298</b>	<b>2,330</b>	<b>2,248</b>	<b>1,604</b>	<b>1,986</b>	<b>17,232</b>
	<b>HAL</b>	<b>240</b>	<b>150</b>	<b>71</b>	<b>54</b>	<b>80</b>	<b>30</b>	<b>36</b>	<b>29</b>	<b>2,647</b>
	<b>Percent HAL</b>	<b>11.6%</b>	<b>5.7%</b>	<b>2.8%</b>	<b>2.3%</b>	<b>3.3%</b>	<b>1.3%</b>	<b>2.2%</b>	<b>1.4%</b>	<b>13.3%</b>

**Table A.17**  
**HALs Originated by Race of Borrower**

City of Lewisville  
2008–2015 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	Total
American Indian	0	0	0	0	0	0	0	0	0
Asian	9	7	3	0	2	2	0	0	23
Black	10	2	2	0	1	0	0	0	15
White	127	56	47	30	58	16	18	23	375
Not Available	12	5	0	5	7	1	6	1	37
Not Applicable	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>158</b>	<b>70</b>	<b>52</b>	<b>35</b>	<b>68</b>	<b>19</b>	<b>24</b>	<b>24</b>	<b>450</b>
Non-Hispanic	71	47	23	12	15	10	4	3	185
Hispanic	73	18	28	17	46	7	16	18	223

**Table A.18**  
**Rate of HALs Originated by Race/Ethnicity of Borrower**

City of Lewisville  
 2008–2015 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	Average
American Indian	.0%	.0%	.0%	.0%	.0%	.0%	.0%	.0%	.0%
Asian	7.3%	5.1%	2.2%	.0%	2.2%	1.2%	.0%	.0%	2.1%
Black	15.9%	3.6%	4.3%	.0%	2.4%	.0%	.0%	.0%	3.3%
White	13.1%	6.5%	6.4%	4.9%	7.9%	2.1%	2.5%	2.9%	6.0%
Not Available	10.1%	5.4%	.0%	5.2%	8.5%	1.1%	6.1%	.9%	4.8%
Not Applicable	%	.0%	%	%	%	%	%	%	.0%
<b>Average</b>	<b>12.3%</b>	<b>6.1%</b>	<b>5.2%</b>	<b>4.1%</b>	<b>7.1%</b>	<b>1.7%</b>	<b>2.3%</b>	<b>2.0%</b>	<b>5.3%</b>
Non-Hispanic	7.3%	5.0%	3.1%	1.8%	2.1%	1.1%	.5%	.3%	2.8%
Hispanic	37.2%	14.1%	16.9%	17.2%	31.7%	6.1%	11.8%	10.8%	19.4%

**Table A.19**  
**Loans by HAL Status by Race/Ethnicity of Borrower**

City of Lewisville  
 2008–2015 HMDA Data

Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	Total
American Indian	Other	7	5	4	4	2	4	4	8	38
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	.0%	.0%	.0%	.0%	.0%	.0%	.0%	.0%
Asian	Other	115	129	136	98	90	163	147	184	1,062
	HAL	9	7	3	0	2	2	0	0	23
	Percent HAL	7.3%	5.1%	2.2%	.0%	2.2%	1.2%	.0%	.0%	2.1%
Black	Other	53	53	44	41	41	59	58	94	443
	HAL	10	2	2	0	1	0	0	0	15
	Percent HAL	15.9%	3.6%	4.3%	.0%	2.4%	.0%	.0%	.0%	3.3%
White	Other	846	808	682	584	679	761	709	764	5,833
	HAL	127	56	47	30	58	16	18	23	375
	Percent HAL	13.1%	6.5%	6.4%	4.9%	7.9%	2.1%	2.5%	2.9%	6.0%
Not Available	Other	107	88	86	92	75	90	93	105	736
	HAL	12	5	0	5	7	1	6	1	37
	Percent HAL	10.1%	5.4%	.0%	5.2%	8.5%	1.1%	6.1%	.9%	4.8%
Not Applicable	Other	0	1	0	0	0	0	0	0	1
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	%	.0%	%	%	%	%	%	%	.0%
<b>Total</b>	<b>Other</b>	<b>1,128</b>	<b>1,084</b>	<b>952</b>	<b>819</b>	<b>887</b>	<b>1,077</b>	<b>1,011</b>	<b>1,155</b>	<b>8,113</b>
	<b>HAL</b>	<b>158</b>	<b>70</b>	<b>52</b>	<b>35</b>	<b>68</b>	<b>19</b>	<b>24</b>	<b>24</b>	<b>450</b>
	<b>Percent HAL</b>	<b>12.3%</b>	<b>6.1%</b>	<b>5.2%</b>	<b>4.1%</b>	<b>7.1%</b>	<b>1.7%</b>	<b>2.3%</b>	<b>2.0%</b>	<b>5.3%</b>
Non-Hispanic	Other	900	888	730	657	712	881	806	906	6,480
	HAL	71	47	23	12	15	10	4	3	185
	Percent HAL	7.3%	5.0%	3.1%	1.8%	2.1%	1.1%	.5%	.3%	2.8%
Hispanic	Other	123	110	138	82	99	108	120	148	928
	HAL	73	18	28	17	46	7	16	18	223
	Percent HAL	37.2%	14.1%	16.9%	17.2%	31.7%	6.1%	11.8%	10.8%	19.4%

**Table A.20**  
**Rates of HALs by Income of Borrower**

City of Lewisville  
2008–2015 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	Average
\$15,000 or Below	.0%	.0%	.0%	.0%	.0%	%	%	.0%	.0%
\$15,001–\$30,000	47.5%	8.9%	14.7%	17.1%	26.5%	7.1%	14.3%	5.0%	20.1%
\$30,001–\$45,000	20.3%	7.7%	8.7%	8.4%	17.5%	1.9%	7.1%	11.0%	10.9%
\$45,001–\$60,000	14.0%	6.6%	3.4%	3.2%	4.2%	1.4%	3.4%	2.3%	4.9%
\$60,001–\$75,000	9.2%	4.8%	.0%	.8%	3.6%	1.2%	1.7%	2.1%	3.2%
Above \$75,000	6.6%	5.6%	5.0%	3.0%	2.8%	1.6%	.4%	.0%	3.0%
Data Missing	5.9%	.0%	.0%	.0%	.0%	.0%	.0%	.0%	1.2%
<b>Average</b>	<b>12.3%</b>	<b>6.1%</b>	<b>5.2%</b>	<b>4.1%</b>	<b>7.1%</b>	<b>1.7%</b>	<b>2.3%</b>	<b>2.0%</b>	<b>5.3%</b>

**Table A.21**  
**Loans by HAL Status by Income of Borrower**

City of Lewisville  
2008–2015 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	Total
\$15,000 or Below	Other	1	2	2	2	1	0	0	1	9
	HAL	0	0	0	0	0	0	0	0	0
	Percent HAL	.0%	.0%	.0%	.0%	.0%	%	%	.0%	.0%
\$15,001–\$30,000	Other	32	41	58	34	36	39	24	19	283
	HAL	29	4	10	7	13	3	4	1	71
	Percent HAL	47.5%	8.9%	14.7%	17.1%	26.5%	7.1%	14.3%	5.0%	20.1%
\$30,001–\$45,000	Other	157	156	147	109	146	151	118	113	1,097
	HAL	40	13	14	10	31	3	9	14	134
	Percent HAL	20.3%	7.7%	8.7%	8.4%	17.5%	1.9%	7.1%	11.0%	10.9%
\$45,001–\$60,000	Other	185	241	197	179	207	210	171	214	1,604
	HAL	30	17	7	6	9	3	6	5	83
	Percent HAL	14.0%	6.6%	3.4%	3.2%	4.2%	1.4%	3.4%	2.3%	4.9%
\$60,001–\$75,000	Other	197	180	144	131	135	168	170	186	1,311
	HAL	20	9	0	1	5	2	3	4	44
	Percent HAL	9.2%	4.8%	0.0%	.8%	3.6%	1.2%	1.7%	2.1%	3.2%
Above \$75,000	Other	540	456	398	357	353	497	515	609	3,725
	HAL	38	27	21	11	10	8	2	0	117
	Percent HAL	6.6%	5.6%	5.0%	3.0%	2.8%	1.6%	.4%	.0%	3.0%
Data Missing	Other	16	8	6	7	9	12	13	13	84
	HAL	1	0	0	0	0	0	0	0	1
	Percent HAL	5.9%	.0%	.0%	.0%	.0%	.0%	.0%	.0%	1.2%
<b>Total</b>	<b>Other</b>	<b>1,128</b>	<b>1,084</b>	<b>952</b>	<b>819</b>	<b>887</b>	<b>1,077</b>	<b>1,011</b>	<b>1,155</b>	<b>8,113</b>
	<b>HAL</b>	<b>158</b>	<b>70</b>	<b>52</b>	<b>35</b>	<b>68</b>	<b>19</b>	<b>24</b>	<b>24</b>	<b>450</b>
	<b>Percent HAL</b>	<b>12.3%</b>	<b>6.1%</b>	<b>5.2%</b>	<b>4.1%</b>	<b>7.1%</b>	<b>1.7%</b>	<b>2.3%</b>	<b>2.0%</b>	<b>5.3%</b>

## B. FAIR HOUSING FORUM PRESENTATION

### Lewisville 2017 Assessment of Fair Housing



**2017 Assessment of Fair Housing**

Sponsored by  
The City of Lewisville

Welcome!

Lewisville Fair Housing Forum 1 November 15, 2016



**Why Are We Doing This?**

**Entitlements must:**

Certify that they are Affirmatively Furthering Fair Housing (AFFH) as a condition of receiving federal funds from HUD

Lewisville Fair Housing Forum 2 November 15, 2016

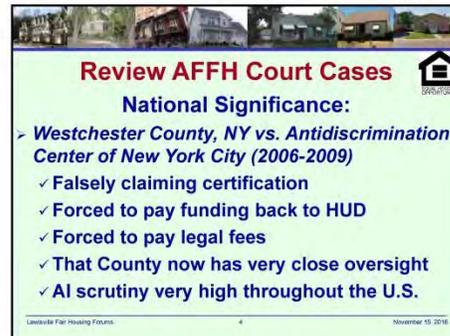


**Past Fair Housing Studies**

**Over the past 20 years, AFFH meant Preparing an Analysis of Impediments to Fair Housing Choice (AI):**

1. Conducting an AI – Identify barriers
2. Taking action on impediments, if impediments/barriers were found
3. Maintaining records of actions

Lewisville Fair Housing Forum 3 November 15, 2016



**Review AFFH Court Cases**

**National Significance:**

- *Westchester County, NY vs. Antidiscrimination Center of New York City (2006-2009)*
- ✓ Falsely claiming certification
- ✓ Forced to pay funding back to HUD
- ✓ Forced to pay legal fees
- ✓ That County now has very close oversight
- ✓ AI scrutiny very high throughout the U.S.

Lewisville Fair Housing Forum 4 November 15, 2016



**Review AFFH Evolution**

**Key Points In Time:**

- GAO report castigating HUD - 2010
- Proposed Rule for AFFH - 2013
  - ✓ Inclusive neighborhoods
  - ✓ Reduce highly concentrated poverty
  - ✓ Increase access to community assets
  - ✓ Reduce disproportionate share for minorities
- Final Rule Published - July 8, 2015

Lewisville Fair Housing Forum 5 November 15, 2016



**2017 Lewisville AFH**

**Now AFFH means:**

1. Conduct an Assessment of Fair Housing (AFH) – must use HUD data and must use HUD “Assessment Tool”
2. Identify fair housing *issues*
3. Addressing *contributing factors*
4. Prioritize *fair housing goals & actions*

Lewisville Fair Housing Forum 6 November 15, 2016

November 15, 2016: Page 1

Lewisville  
2017 Assessment of Fair Housing

**Operating within Context of:**

- A **fair housing issue** is a condition that restricts fair housing choice or access to opportunity.
- A **contributing factor** creates, contributes to, perpetuates, increases the severity of one or more fair housing issues.
- Fair housing **goals/actions** represent things that are committed to and must be done to accomplish the AFFH duty

Lewisville Fair Housing Forum 7 November 15, 2016

**Today's Forum Meeting:**

- Introduce you to our new AFFH duty
- Show you HUD-provided indices
- Provide context for the study
- Discuss preliminary findings
- Gain your input and your perspective on **fair housing issues** and **contributing factors** in Lewisville

Lewisville Fair Housing Forum 8 November 15, 2016

**Who is protected?**

Protected classes under state and federal law:

**Race, color, religion, familial status, sex, disability, and national origin**

Lewisville Fair Housing Forum 9 November 15, 2016

**2017 Lewisville AFH**

Population by Race and Ethnicity  
Lewisville  
2010 Census & 2014 Five-Year ACS

Race	2010 Census		2014 Five-Year ACS	
	Population	% of Total	Population	% of Total
White	62,263	85.3%	73,778	74.5%
Black	10,861	15.2%	18,915	19.2%
American Indian	623	.7%	146	.1%
Asian	7,362	7.8%	7,777	7.9%
Native Hawaiian/ Pacific Islander	67	.1%	87	.1%
Other	11,236	11.8%	3,454	3.5%
Two or More Races	3,046	3.2%	4,022	5.0%
<b>Total</b>	<b>85,260</b>	<b>100.0%</b>	<b>99,929</b>	<b>100.0%</b>
Non-Hispanic	67,507	70.8%	69,088	69.8%
Hispanic	27,763	29.2%	29,951	30.2%

Lewisville Fair Housing Forum 10 November 15, 2016

**2017 Lewisville AFH**

Lewisville Fair Housing Forum 11 November 15, 2016

**2017 Lewisville AFH**

**HUD's Analysis AFFH Includes:**

1. RCAP and ECAP evaluation
2. Segregation analysis
3. Disparities in access to opportunity
4. Disproportionate housing needs
5. Disability and access analysis
6. Fair housing enforcement, outreach capacity, and resource analysis

Lewisville Fair Housing Forum 12 November 15, 2016

Lewisville  
2017 Assessment of Fair Housing

### #1: RCAP and ECAP

- RCAP and ECAP areas must have 40% Poverty and 50% or more non-white
- Hence, there are no RCAPs or ECAPs in Lewisville

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### #2: Segregation Analysis: The Dissimilarity Index

**Dissimilarity Trends**

Lewisville  
2016 HUD AFFH Database

Racial/Ethnic Dissimilarity Index	1990	2000	2010
Non-White/White	17.41	20.04	26.87
Black/White	23.36	19.72	38.57
Hispanic/White	19.68	31.86	37.82
Asian or Pacific Islander/White	26.36	25.42	36.12

**Interpreting the Dissimilarity Index**

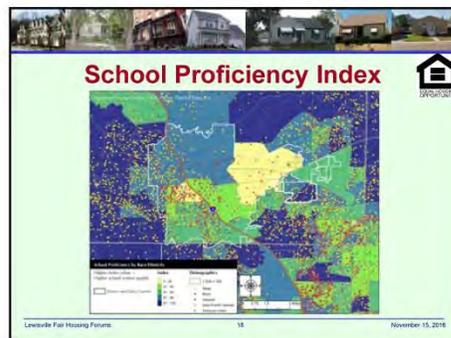
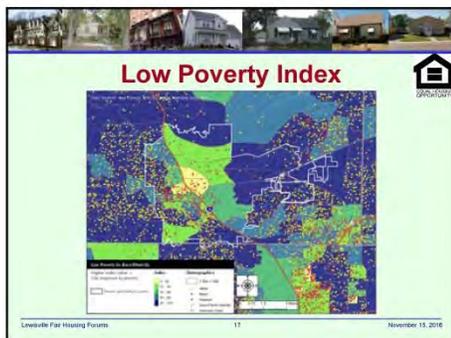
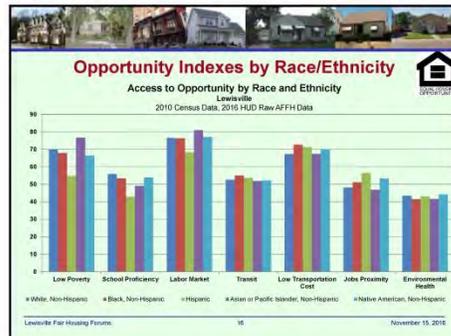
Measure	Values	Description
Dissimilarity Index	<40	Low Segregation
	40-54	Moderate Segregation
	>55	High Segregation

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### #3: Disparities in Access to Opportunity

- Areas of Opportunity are physical places
- Identified through quantitative means, such as an index by Census Tract
- Seven indexes: low poverty, school proficiency, labor market engagement, transit trips, low transportation cost, job proximity, and environmental health

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Lewisville  
2017 Assessment of Fair Housing

### #4: Disproportionate Housing Needs Those with Housing Problems:

- Experiencing overcrowding: more than one inhabitant per room
- Having incomplete kitchen or plumbing facilities
- Experiencing cost-burdens
- Housing costs over 30% of income

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### Unmet Housing Needs Households with Problems

Housing Problems by Race, Ethnicity, and Household Type  
Lewisville  
2008-2012 HUD CHAS Data

Disproportionate Housing Needs	Lewisville		
Households experiencing any of 4 housing problems*	# with problems	# households	% with problems
<b>Race/Ethnicity</b>			
White, Non-Hispanic	6,328	21,720	29.12
Black, Non-Hispanic	1,580	3,770	41.91
Hispanic	3,020	9,045	48.75
Asian or Pacific Islander, Non-Hispanic	910	2,359	38.58
Native American, Non-Hispanic	85	120	70.83
Other, Non-Hispanic	440	1,899	40.04
<b>Total</b>	<b>13,233</b>	<b>37,135</b>	<b>35.64</b>
<b>Household Type and Size</b>			
Family households, <5 people	5,665	19,345	29.28
Family households, 5+ people	2,240	3,940	66.85
Non-family households	5,335	13,845	38.53

Lewisville Fair Housing Forum 20 November 15, 2016

### Unmet Housing Needs

Lewisville Fair Housing Forum 21 November 15, 2016

### #5: Disability and Access

Persons with Disabilities in Lewisville  
2010-2014 ACS Data

Hearing difficulty	2,152	2.40
Vision difficulty	921	1.03
Cognitive difficulty	3,149	3.52
Ambulatory difficulty	3,594	4.00
Self-care difficulty	1,443	1.61
Independent living difficulty	2,384	2.66

Lewisville Fair Housing Forum 22 November 15, 2016

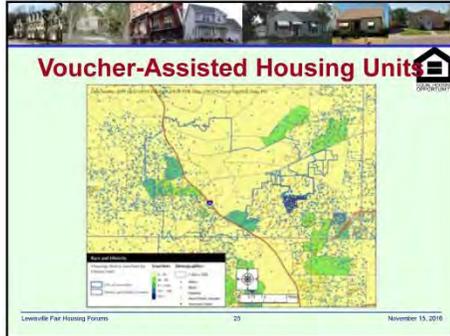
### Concentration Of Residents With Disabilities

Lewisville Fair Housing Forum 23 November 15, 2016

### Public-Assisted Housing Units

Lewisville Fair Housing Forum 24 November 15, 2016

Lewisville  
2017 Assessment of Fair Housing



**Assisted Housing Units For Disabled**

Public-Assisted Housing Residents with Disabilities by Program

Lewisville July 2016 HUD Data

	#	%
Public Housing	0	0
Project-Based Section 8	0	0
Other Multifamily	0	0
<b>HCV Program</b>	<b>73</b>	<b>19.68</b>

Lewisville Fair Housing Forum 25 November 15, 2016

**#6: Fair Housing Enforcement Housing Complaints**

Fair Housing Complaints by Basis of Complaint

City of Lewisville 2008-2016 HUD Data

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Disability	2	2	2	1	1	3	-	4	15	
Race	6	2	1	-	-	2	1	-	12	
Sex	1	-	-	-	-	1	1	-	3	
Family Status	-	-	1	-	-	-	-	-	2	
National Origin	-	-	1	-	-	-	-	-	1	
Retaliation	1	-	-	-	-	-	-	-	1	
<b>Total</b>	<b>11</b>	<b>2</b>	<b>4</b>	<b>3</b>	<b>1</b>	<b>6</b>	<b>2</b>	<b>4</b>	<b>34</b>	
<b>Total Complaints</b>	<b>8</b>	<b>2</b>	<b>3</b>	<b>3</b>	<b>1</b>	<b>4</b>	<b>2</b>	<b>4</b>	<b>28</b>	

Lewisville Fair Housing Forum 27 November 15, 2016

**#6: Fair Housing Enforcement Housing Complaints**

Fair Housing Complaints by Issue of Complaint

City of Lewisville 2008-2016 HUD Data

Basis	Total
Discriminatory terms, conditions, privileges, or services and facilities	17
Discrimination in terms/conditions/privileges relating to rental	7
Failure to make reasonable accommodation	7
Discriminatory refusal to rent	6
Discriminatory acts under Section 818 (coercion, Etc.)	5
Discriminatory financing (includes real estate transactions)	2
Discriminatory refusal to rent and negotiate for rental	2
Discriminatory refusal to negotiate for rental	1
False denial or representation of availability - rental	1
<b>Total Issues</b>	<b>48</b>
<b>Total Complaints</b>	<b>28</b>

Lewisville Fair Housing Forum 25 November 15, 2016

**#6 Cont. FH Enforcement Home Lending**

Purpose of Loan by Year

Lewisville 2008-2015 HUD Data

Purpose	2008	2009	2010	2011	2012	2013	2014	2015	Total
Home Purchase	2,874	2,871	2,384	1,993	2,133	2,346	2,180	2,367	16,781
Home Improvement	396	206	154	189	167	143	182	184	1,437
Refinancing	1,972	2,301	2,128	2,231	2,089	2,693	2,223	1,768	16,548
<b>Total</b>	<b>5,242</b>	<b>5,338</b>	<b>4,792</b>	<b>4,413</b>	<b>4,389</b>	<b>5,182</b>	<b>4,546</b>	<b>4,319</b>	<b>38,761</b>

Occupancy Status for Home Purchase Loan Applications

Lewisville 2008-2015 HUD Data

Status	2008	2009	2010	2011	2012	2013	2014	2015	Total
Owner-Occupied	2,668	2,700	2,305	1,852	1,964	2,125	1,956	2,411	15,981
Not Owner-Occupied	204	109	114	137	162	206	220	215	1,154
Not Applicable	2	2	6	4	7	13	5	11	58
<b>Total</b>	<b>2,874</b>	<b>2,871</b>	<b>2,384</b>	<b>1,993</b>	<b>2,133</b>	<b>2,346</b>	<b>2,180</b>	<b>2,367</b>	<b>16,781</b>

Lewisville Fair Housing Forum 25 November 15, 2016

**Home Lending**

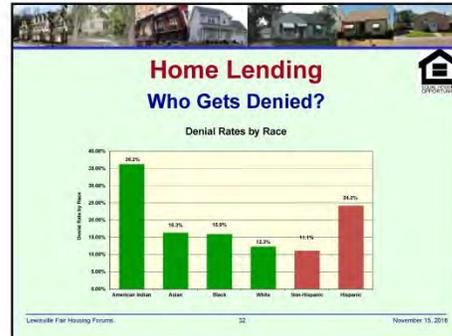
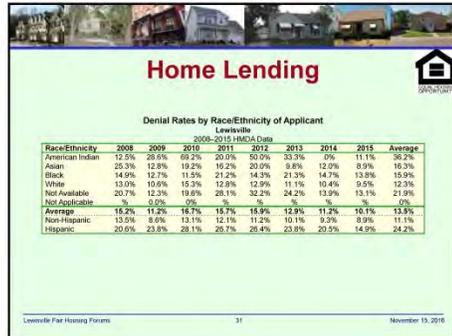
Loan Applications by Action Taken

Lewisville 2008-2015 HUD Data

Action	2008	2009	2010	2011	2012	2013	2014	Total	
Loan Originated	1,289	1,154	1,004	954	950	1,090	1,035	1,179	7,364
Application Approved but not Accepted	131	70	133	58	68	53	70	56	603
Application Denied	230	145	201	159	180	192	130	133	1,207
Application Withdrawn by Applicant	165	128	128	103	124	178	181	188	1,015
File Closed for Incompleteness	29	29	18	20	14	35	17	41	159
Loan Purchased by the Institution	815	1,210	781	658	802	821	622	546	6,165
Preapproval Request Denied	8	13	0	0	0	0	0	0	21
Preapproval Approved but not Accepted	7	3	0	0	1	0	0	0	11
<b>Total</b>	<b>2,668</b>	<b>2,700</b>	<b>2,385</b>	<b>1,852</b>	<b>1,964</b>	<b>2,125</b>	<b>1,988</b>	<b>2,141</b>	<b>16,580</b>
<b>Denial Rate</b>	<b>19.2%</b>	<b>11.2%</b>	<b>16.7%</b>	<b>16.7%</b>	<b>16.9%</b>	<b>12.4%</b>	<b>11.2%</b>	<b>10.1%</b>	<b>13.9%</b>

Lewisville Fair Housing Forum 30 November 15, 2016

**Lewisville  
2017 Assessment of Fair Housing**



**Lewisville  
2017 Assessment of Fair Housing**



**2017 Lewisville AFH** 

**Contact Information**

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Lewisville Fair Housing Forum 37 November 15, 2016

November 15, 2016: Page 7

## C. PUBLIC INVOLVEMENT DOCUMENTATION

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The following presents a transcript of the November 1, 2016 public input meeting.

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**Comment 1:** OK, thank you very much. Do we have any questions?

**Comment 2:** Is there a copy of the survey?

**Presenter:** There is, yes.

**Comment 3:** Can we see the survey?

**Presenter:** Would you like to see a copy of the survey?

**Comment 4:** We would like to see it.

**Presenter:** OK, you can have that. We had a staff meeting a couple of hours ago and we presented it to the City and we talked about it. It hasn't been finally approved yet. I guess he would like to answer that question.

**Comment 5:** You can see the draft that has a few comments on it scribbled in.

**Comment 6:** Then how will it be delivered to the public?

**Presenter:** There of course will be printed forms at each of the meetings and printed forms distributed. There is also and it is actually survey monkey online version and email distribution will be created and submitted to the community and various groups and individuals. So when you get your announcement with the survey link embedded you can click on that link and go to it. I would certainly encourage you to forward it to anyone you can think of especially your realtors and property managers, friends and others in the housing industry to get their opinion.

**Comment 7:** Do we know what mailing list? Will we be using residents that have water bills or...

**Presenter:** We do not have time to do a mailing.

**Comment 8:** You said emails. How are we and what pool of emails are we using?

**Presenter:** I am depending on the City to address that.

**Comment 9:** At this time we are emailing it to a few groups that we have. Groups of homebuyers and grant applicants that have gone through our programs and social service agencies, realtors associations. We have several groups that we are going to ask to distribute the survey to their members, but there is to an email list of the general population. This won't be something that every household receives.

**Presenter:** We also will be posting it on social media, but I want to emphasis this is not statically drawn survey. This is, if you will, a judgmental survey. We are just trying to get everyone we can think of to participate.

**Comment 10:** I guess my thought was there was a good pool of people mentioned, but more of the persons maybe not in homes, but in apartments. We have a lot of apartment complexes in Lewisville. To get the survey out to those parties, to find out what their needs are, and maybe get them into homes. I guess was why I was asking that question.

**Presenter:** If we can post it on the bulletin board on the front that you can go to this link. We can have printed copies delivered. It is entirely up to the City to do.

**Comment 11:** I think that would be a good idea.

**Comment 12:** Is it going to be in any other languages besides English?

**Presenter:** We can do whatever language you want. I am assuming if you want to have a Spanish survey that is common. We have done them in Russian, Korean, Chinese, or Spanish.

**Comment 13:** We will probably look at Chin, because we do have a huge population.

(Crosstalk)

**Comment 14:** We know where that population resides and to not just be sending them out at random.

**Presenter:** It is open to everyone.

**Comment 15:** So the survey approach is that something specific to our process or is that something that HUD recommended?

**Presenter:** HUD recommends they actually have a formula for trying to determine how many languages you need to produce for an analysis. Roughly, if you have 1,000 residents who have English as a second language and whatever that English is then you should probably think about having access to those languages. It doesn't necessarily mean they all have to be printed like at the public meetings. You might need verbal translates if an announcement has been made that a verbal translation was needed. It is considered a special service. You just need to give advance notice.

**Comment 16:** To clarify, the forum as a data gathering tool is that recommended by HUD?

**Presenter:** Is this one?

**Comment 17:** No, so let me step back a bit. My questions are more related to the data that is being used to provide, to fill out the form and turn it back to HUD. So at some point you mentioned that the data is provided by HUD itself. So what other data are we actually asking for and are there or is there guidance from HUD on how to collect that information.

**Presenter:** Guidance from HUD. Remember they just went through 20 years of getting in trouble so they have a manual. They enough, the collection of local data and whatever local data might be. We are going to collect the survey and that is local data. We are going to collect input at the public input meetings and that is local data. We are also going to do housing compliant data and that is local data. We are going to go talk with Francis Espinoza at the Fair Housing Center and talk and see what they have and see if they can contribute something. So that is local data and we also have lending.

**Comment 18:** So in other words the guidance from HUD is to collect local data and to your team and us how to do that.

**Presenter:** That is correct.

**Comment 19:** Can I talk a moment. I know that we have at least one audience member that can't stay. Can we open it up to if we have questions or comments from the audience and then get back to committee questions?

**Comment 20:** Yes, please. Are there any citizen comments? Please go ahead and come up front and give your name and address as well. Thank you.

**Comment 21:** My question really actually also pertains to the data. I live in the Lewisville area and am not currently a resident in Lewisville, but I attend church here. My question has to do with the types of questions that are asked. What types of data is that you are going to be collecting. I heard you say it is about lending. So it is going to include some of the information about the loans that are available to people to move out of rental properties perhaps and purchase housing. What other types of data is that you are going to be looking for from residents as well as providers, housing providers?

**Presenter:** To clarify the lending information is what is reported by the Home Mortgage Disclosure Act. So that represents people who have completed or have started a loan application. We will determine in analyzing that data how many applications were completed. Some of them don't get completed and others and what the financial institution what the decision they made. So it is banks and nonbanking institutions that runs the full range of entities. There is a threshold by which they need to report under HMDA, but it is nearly all financial institutions. The survey is another instrument that we are using. It doesn't ask did you apply for a loan? It asks are you a renter or a homeowner? Then it asks more about what your experiences are and what is your knowledge about these various things? There is a private sector transaction and public sector transactions and it kind of gets a measure of the understanding that people and particularly stakeholders have about fair housing. The other types of data are both qualitative, such as denied is a qualitative data and a quantitative of course is HMDA and you can quantitatively talk about the housing complaints that came forward and address the issues. We are not going to open every individual complaint record and look at those, but those complaints are summarized. For example we always submit a letter, a Freedom of Information Act request to HUD. Those went to HUD last week before we signed a contract. I was hoping we would finish. They give us 22 workdays, Monday through Friday. So

hopefully we will get that in time to put it in the document. So that period of time we have is a little bit driving our process, but we are going to collect as much as we can.

**Comment 22:** My other question has to do with distribution of the instrument itself and presumably when you talk about fair housing it addressed the local people who fall into a lower economic status, correct. So then you want to get as much feedback from some of those types of populations as possible.

**Presenter:** I am open to getting and the survey can be filled out by anyone and I am hoping that everyone can do one. There is theoretically no limit to the size of the sample since it is online and every citizen can.

**Comment 23:** But they have to be aware.

**Comment 24:** Two more questions and then I will stop. I promise. How long is the survey?

**Presenter:** It is a few pages. It should take and online it should take approximately ten minutes or less.

**Comment 25:** Can she see the draft?

**Comment 26:** So can we consider...can I see it? Can we consider then the City making copies for distribution at some of the local churches?

**Presenter:** That would be excellent. I am all in favor of it.

**Comment 27:** African American, Hispanic.

**Comment 28:** We certainly can and we will be looking for social service providers to help us distribute them as well.

**Comment 29:** I volunteer at three churches, Hispanic, African American, and Chin.

**Presenter:** That would be wonderful. Thank you

**Comment 30:** I look forward to getting the results.

**Comment 31:** Thank you. As a follow-up to one of the questions she asked. How important is it to know some of the demographic information of the people filling out the survey or is it just purely data that we are looking for?

**Presenter:** I am actually having some trouble hearing you,

**Comment 32:** Is this better?

**Presenter:** A little bit yes.

**Comment 33:** So, how important is it to have the demographic information of the people filling out the survey or are you just looking for the data from the survey?

**Presenter:** HUD has requested the demographics of participants to the public engagement process. They haven't requested the demographics to the survey. Since the survey is not a statically sample. If you were to collect that that wouldn't be that meaningful. We couldn't generalize it. So we typically use census data to character is the attributes of the population. There is 2000 and 2010 and the American Community Survey which is done very year and that is through 2004 currently.

**Comment 34:** OK, thank you.

**Comment 35:** I just find that odd because the answers are going to be different based on the demographic of the person that is answering, who is answering or taking the survey. So I am just trying to figure out are they just going to by how that person answered to figure out, why they wouldn't want to know the demographics of the person that is doing it. I understand that they are only looking for statistical data, but I mean just like the lady back there. I mean the whole purpose or the premise behind it is to make sure that certain demographics of people that were being affected by unfair lending practices or discriminatory practices. I am just trying to understand why they would not want to know who is filling out the survey monkey.

**Presenter:** I couldn't and I do not know what is going on in HUD head.

**Comment 36:** It almost defeats the purpose of having it. Everyone is going to answer differently accordingly to their interaction with the mortgage lender, with you know exactly.

**Presenter:** Actually it is important to get a broad perspective. So I am OK with that. The sample should represent everyone who has been involved with housing or housing transactions. Those

people who made housing choices. If they chose to stay with a rental or only purchase. I think we will hear about that.

**Comment 37:** I don't know what based on the questions I guess. My concern was do we just go by a template based or where do we get our questions from? I ask that because it doesn't seem that we asked any questions specific to our Lewisville residents and what they specifically like some of the things we know go on specifically in our town to try to get information about to address our town specifically or our city?

**Comment 38:** Not Discernable

**Comment 39:** No, because asking if you are aware of housing ordinances or regulations or plans within the city doesn't really tell you what some of those challenges are. That just shows are you aware and then the level of your awareness. It is a very subjective question and I am not sure how that tells you what someone challenges are in the City of Lewisville when it comes to housing because they vary. These question I have is I don't see how they help us address those issues specifically for our residents in the best way that we can.

**Comment 40:** Is there time for us to make updates to the survey?

**Presenter:** Pardon me?

**Comment 41:** Is there time for us to make updates to the survey?

**Presenter:** It is up to you guys.

**Comment 42:** We want to have it out by the end of this week basically. You can send me comments. If you can send me comments tomorrow we will bounce them back with him and see what we can conclude.

**Comment 43:** I also think we have one more resident that wanted to make a comment.

**Comment 44:** I am the Director of Chin Community Ministry. Lewisville is the home to what is called a spontaneous refugee community.

**Comment 45:** Please go ahead and get closer to the microphone. This is also being recorded. I can hear you fine, but just in case.

**Comment 46:** My name is Becky Nelson and I am the Director of Chin Community Ministry which is a non-profit that works to equip the 3,500 Chin refugees that have chosen to settle in Lewisville and we are concentrated in zip code 75067 and some of the poverty housing that was mentioned is where the Chin reside. I represent of the 3,500 approximately, 3,500 Chin who live in Lewisville I have on my database meaning that I have helped them in the last five years. I represent 638 households for about a 2,500 Chin people that I have statics for. Of those statics the households we are moving into houses. The Chin are moving into houses. It fits their multi-generational lifestyle because they can have more than one income. They can have three or four incomes, because they often live with an aunt and I am talking young. Most of everybody is young because the others cannot make it out of Burma. So I have complied for you and I don't know if this is valuable, but I did make a copy for you of where we are concentrated. The biggest issue that I see based on that you presented is the percentage of income that goes to housing. Basically, the housing apartments that are concentrated in zip code 75067 their rent has doubled since 2010. What used to be a \$550 two bedroom apartment is now running about \$1,100. If a Chin person and not just Chin or other people or population, Hispanic and other ethnic groups that are making and we are 95 percent employed in Lewisville right now. Every day I get a call saying we will take more Chin people to work. So we are heavily heavily employed. However we are now up to approximately \$11 an hour. For a one person income at 40 hours a week, that equals \$1760 a month and you are paying out \$1,100 in rent. The housing is not extravagant. My office is in Basswood apartments. We stay on the edge of even the acceptable housing. The others are a little bit better and Basswood is much better since the city has really worked with them, but basically you would call us Class C or Class D housing which means that the housing is over 30 years; I believe is the distinction in multi-family housing. That Class C housing is 30 years old and Class D housing tends to be past 30 years old. If you look at when Basswood was built you know that it is close to being Class D housing which is the lowest type of housing and yet the rent is still up to about \$1,250. That does include utilities,

but it is still way beyond. So what that means is that we are required to have two income housing and sometimes three income and the kind of pressure that is putting on means that the oldest child because when they come from Burma that have to go into 9<sup>th</sup> grade because Burma does not have any kind of educational system. So they go into 9<sup>th</sup> grade and that means that they are older when they go into 9<sup>th</sup> grade and as soon as they hit 17 the family requires them to quit school whether they have a high school diploma or to. So that they can provide the third income. That is what is the effect of the housing. The other problem that we have is a shortage of that kind of housing. Again, I remind you they are the working poor. They are working and some of them are working two to three jobs in order to provide for their family, but even with two people working making \$11 an hour and most of the women do not make \$11 an hour they usually make \$9. So even if they did make \$11 you are looking at still 50 percent of your income going for housing that is and would not pass most people in Lewisville, the rent is Lewisville probably would not consider totally acceptable. So I just brought that and I had this information as to where we are. We have 110 houses representing 200 households. Vista on the Park is our largest. They are the ones that have gone the highest in rent. We have 127 households there. Oaktree we have 103. Basswood we are down to 63. People are trying to move out as fast as they can and saving money to try and get out. Willow Ridge is 55 and then it goes on down from there. So all of our apartment complexes are approximately aging housing. Nobody ever builds Class C housing if it is based on aging. So the next question will be where they migrate. They are trying to get out of Basswood. They went over to Vista on the Park, but again the biggest issue is simply the percentage of income that has to be spent on housing.

**Comment 47:** Thank you.

**Comment 48:** Does anyone have any questions for me? I will be glad to distribute surveys, etc. to the Chin but it will need Hakha Chin translation. The biggest difficulty is conceptual. You can have the words, but are they aware of fair housing. So a lot of it would just be based on the concepts that would be necessary.

**Comment 49:** So how difficult would it be to get a translation of the survey?

**Comment 50:** That is a question for Becky.

**Comment 51:** How difficult would it be to get a translation into Chin? I was under the impression that it would be pretty difficult.

**Comment 52:** The difficulty with translating into Chin is that Chin does not have and it is a very simple language and it doesn't have the concepts that we have. So we just finished a recycling brochure for the city. There is no word for plastic. So basically we used the English word plastic because that is the only and how can you describe plastic. So there is that kind of issue with translation. The other issue is of course that those methods of dissemination would not be and most of them do not use internet, email. The Census Bureau tried really hard. I am really curious to see if we showed up on the Census this year or whenever. In the past they didn't show up. Now the Census Bureau has actually contacted us and we have actually had Census people come in and we have translated so that they can get Census information. I have the names, addresses, and phone numbers if anybody wants to say they we only have ten Chin people in Lewisville. I will tell you that we have 3,500. So to answer your question it is difficult, but again I think the question that you asked is what kind of information you want to get if you want to know what they think is unfair they can tell you that. It is unfair that you only get things fixed when it is time to get fixed. There is a lot of unfairness that goes on with poverty housing. It takes a long time to get something fixed and if we have to we go to the city.

**Comment 53:** Is that the kind of information we are looking for in this survey?

**Comment 54:** As a committee yes.

**Comment 55:** Do you have ideas on how you want to use this data that is helpful?

**Presenter:** I do have ideas and I guess I will talk with him about any additional data that you would like to collect and how we might use that.

**Comment 56:** It seems to me that it is going to be a discussion about access their ought to be a plan to talk about expanding access if that access is not being met. If people are not having either adequate or enough supply of housing available to them then perhaps the plan ought to be how do we create more accessible or available affordable housing and how do we make those opportunities available to people in ways that are useful?

**Presenter:** Thank you. Our objective is to reach our goals, fair housing goals and they are whatever you choose. If you choose the goal that she is talking about then we will talk about that goal and what actions you might need to take to accomplish that goal over the next five years. There is a timeline. There are specific things you will need to be responsible for if you choose to go there.

**Comment 57:** How big of a part is the survey play in figuring out our fair housing goals?

**Presenter:** I am really sorry. I just can't seem to understand what is coming back over here.

**Comment 58:** How big of a role does the survey play in figuring out what Lewisville's fair housing goals are?

**Presenter:** It is part of the puzzle. The puzzle has a lot of pieces and it is one of those pieces. I like to include the survey because it is a measure of what people understand. If they lack understanding it tells us something. If they understand things incorrectly that also tells us something. If they have been experiencing something particular that will tell us also. So each of those pieces we can draw from the survey. As an answer as to how your promote a certain housing for a certain group. I am not sure that the survey per say, but across all the different pieces of data that we collect and the policies that we are going to suggest, I am not going to suggest policies. I am going to suggest notions for you, the community to consider and your elected officials will have to decide what those are at some point and later on you will need to decide how much money. Is it just staff that will do these or will we set aside some money from HUD or other resources to take action on these things. So that is where we are headed exactly what this young lady talked about here. How are you going to make this housing available? Is that a priority for you, then we will write it up. This is really about you. It is not about me. I am just the guy who is turning the crank if you will. Trying to get it together for you.

**Comment 59:** I have a question for you. I know in looking at the up there you were talking about the disability. The disability, the citizens with disability. Will there be any type of classes, I was looking at the survey and of course one of them it says, don't know. That is yes, no, and don't know. So will there a class or any type of education for the people to...

**Presenter:** Education and outreach is not a current piece of the element of what my firm is providing to the city. We are focusing just on the study, but I do believe outreach and education has a very important role in fair housing, because as this lady here has suggested and numerous people don't have an understating about what that means. What their landlord obligations are, what their tenant obligations are. So I am all in favor of outreach and education, but it is to my role to preform outreach and education.

**Comment 60:** To clarify that can you, based on the surveys and based on the data analysis that his firm is going to give us that can be one of the goals or policies that we develop.

**Presenter:** That is correct.

**Comment 61:** Having said that are there any other public comments?

**Comment 62:** Basically, what I am trying to get a better handle on is I guess overall plan of action like so I haven't seen the survey so I do not know what is being asked, but the thing I want to find out is are we trying to figure out how to make more people homeowners or are we what is the ultimate goal I guess. The survey is supposed to answer or get a plan of action for what? Does that make sense?

**Comment 63:** The goal of the whole process is to analyze what our fair housing issues are and to develop any strategies that help us move towards solving any of the issues that we identify, which is basically saying and HUD knows that our resources are limited. We have a certain amount of grant funding per year, not to say that cities can't also use other funding sources. So we will be trying to identify realistically. So homeownership programs could be a goal, but so could outreach

and education or so could development or rehabilitation of existing multi-family housing. It is hard to address housing cost from what we can do, but there are a number of and the process will suggest strategies.

**Comment 64:** It sounds to me that it is less about homeownership to let people have a place to live so renters included. There is a copy of the survey up here and over there if you want to take a look at it. It looks like the survey is more and you can correct me if I am wrong, but my impression is the survey is to see what the awareness of fair housing is and maybe possibly an opinion of it, but not really the application of fair housing laws or the effectiveness of fair housing laws. So that is not what the survey seems to be about. It is more about people and if you want to take the survey what do you know about fair housing and what do you think of it, the end. So I think part of what our struggle is how is that opinion and that qualitative data really going to translate to quantitative.

**Comment 65:** To a plan of action.

**Comment 66:** That is something that I am struggling with and just by my very quick glance at that survey. I know that there is only a two month turn around for whatever the final thing that we are turning into HUD is. I think it will also help us to understand what exactly are the data points that HUD is requiring from us and how can we make sure that the data we are collecting is going to be representative of our city by January.

**Comment 67:** The survey is adding to what the HUD data that we have and other data that we will be collecting.

**Presenter:** It seems like you implied a question on whether or not the survey is required by HUD and the answer is no it is not. This is something that I have found over the years to be useful instrument. You are right we are engaging the understanding of fair housing, but not just fair housing law, but a lot of attributes of fair housing, because to communicate with the public we need to understand where they are at. That is the tool. We can get wrapped around the axel and spend weeks and months and try to figure out which question to ask and so on. I want to remind you that I need to deliver a draft for internal review this month to the city and so all of that is done. I am just hoping to get a few responses. We had one customer who was in Louisiana who had a very long time to do the survey and we received roughly 4,300 surveys. That was our best survey. Other jurisdiction and it doesn't matter if you are a state of a million square miles and we have done them there too. Sometimes the surveys somehow it doesn't reach and it is the same method, but somehow it doesn't reach and people don't care, I am not sure what, but it is important to participate. These other methods we have to look at the data that HUD has provided and I will not get into the details, but there are plenty of problems with HUDs data and HUDs maps and all of this other stuff and the online portal you can't even use the document as a public document because there is no maps and no data. It is just narrative. It is just like not formatted or anything, but that is another matter for us to discuss like how do we get the word out, but we are on a very unusually tight schedule. I would not recommend to do it this way next time when you proceed to do this five years from now.

**Comment 68:** Is there a reason why we are on this timeline?

**Presenter:** I do not know what the timeline. It is a very challenging event because this is the first time. I mean on the other hand HUD has dropped the ball. We have a state and after we did this Assessment of Fair Housing, HUD says actually we do not have the tool ready maybe it will be ready next year. Then we found out that we have put your state in with a couple of other states and we are going to do a pilot next year. So it will not be ready until the following year. But you have to use it to submit your Consolidated Plan. Fortunately for an entitlement such as you guys you have it and it is totally useable for you.

**Comment 69:** So I am assuming you have been speaking regarding the survey and what not. Do we have a direction on where we think our goals are going? What direction we are going in so maybe we can change our train of thought about what the survey currently reads.

**Presenter:** We have a scope of work and so that is the road map that I will follow.

**Comment 70:** Do you mean what the goals may be in the plan?

**Comment 71:** It seems like the question is right now and we don't know what the goal is so our problem is it doesn't provide for us Lewisville data. So if we had goals and we knew where the City wanted to go with the plan.

**Comment 72:** We don't really want to prejudge those goals necessarily, but there are and could you speak to some of the common comments in assessments that you have done and some of the types of strategies that were adopted or could be adopted?

**Presenter:** Outreach and education is always there. Some jurisdictions want to go and conduct education for perspective homeowners so they understand the distinction between what is a predatory instrument and what is not a predatory instrument. There is also the education of rental communities and what is a reasonable rental lease and what is not. There is also of course fair housing testing and that, but those are all of the AI pieces. This is kind of new and it is more about what your community will do with your HUD dollars. If you do this well enough to pass HUDs OK then you get your money. If you don't do it well enough you will get to do it again and again until it gets done and we are not sure what that is, because no one has been passed off on one yet. The Assessment of Fair Housing have not been done. They are just starting to come in.

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**The following present a transcript of the November 15, 2016, public input meeting.**

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**Fair Housing Forum**

**Comment 1:** Within our neighborhoods we have the Chin who have increased. Is that in that group anywhere at this time?

**Presenter:** The Chin I believe are in Asian/Pacific Islander.

**Comment 2:** This data is taking off the Census Bureau data, right? So it was under reported in the Census and this information is also unreported.

**Presenter:** I am sorry. What was that?

**Comment 3:** Is this information based on the Census data?

**Presenter:** Yes it is.

**Comment 4:** So if any information was under reported or misrepresented in the Census then might be (Not Discernable) I think we were talking to and she was saying that it is under reported.

**Presenter:** Yes, most certainly for those people who don't want to participate in being counted in the Census and there are many. They would not be reflected in these numbers.

**Comment 5:** That population was growing around the same time that this data was being collected so are local knowledge is probably and that they are not represented fully.

**Presenter:** The question that I always and asked is OK, so these populations are growing whether it is the Chin or Hispanics or whatever. Are they selectively choosing to live close to one another or not? If they choose that then we are reaching a false conclusion that they were forced to do that. So this is the choice we need to make when we try to interpret that.

(Presentation)

**Comment 6:** Are churches in there included?

**Presenter:** Pardon me?

**Comment 7:** Are churches included?

**Presenter:** Churches, no.

**Comment 8:** I know the Muslims or Orthodox are increasing too in our nation. Temples, etc.

**Presenter:** The Muslims religion is not a part of this particular scale. HUDs data does have some limitation.

(Presentation)

**Comment 9:** The difference between number of problems with number of households. Those figures under number of problems are those individual figures?

**Comment 10:** See it says number with problems and then it has the numerical figures. So that numerical figure is that representing one person and that racial group and the number of households? See the first column. Can we get some clarity as to?

**Presenter:** This is the number of households and this is the number of problems.

**Comment 11:** I know. So the numbers of problems is that individual problems? One person problems within that racial makeup?

**Presenter:** No, it is one household. A household might be Native American/non-Hispanic or Hispanic only household.

**Comment 12:** So almost 57 percent of households that are (Not Discernable) have problems.

**Presenter:** This one is likely to be cost burden and overcrowding. The number of households with a number of problems like plumbing and whatnot they are at 0.4 percent. It is tiny.

**Comment 13:** You have that a family is really more than one person to a bedroom is reasonable to expect.

**Presenter:** Per room.

**Comment 14:** Oh, per room. Not per bedroom.

**Presenter:** Not per bedroom. Per room.

**Comment 15:** Interesting.

**Comment 16:** That was a good point to clarify.

**Presenter:** Right, it is not number of bedrooms it is number of rooms. So you might have a kitchen, living room, bedroom.

**Comment 17:** So if you are one person and you only have a kitchen you are OK? I am trying to follow that whole train of thought.

(Presentation)

**Comment 18:** With respect to difficulty what does that include and how is that measured at this point? How is that measured? How do they determine that population, based on school data?

**Presenter:** The American Community Survey, it is a survey of households. It is a sample. The sample might vary from year to year, but it is a sample so the people who answered that question from that household answered it yes/no.

(Presentation)

**Comment 19:** There is not any public data. There is public housing.

**Comment 20:** See that orange blot.

**Presenter:** It is this house. Location of public housing units. There is one right here.

(Crosstalk)

**Comment 21:** You find that anything with government assistance in those areas.

**Presenter:** That is interesting. HUD does not tell me. This is HUDs data.

**Comment 22:** Do you see an address? Can you tell where that is, because we probably know?

**Comment 23:** Is that Basswood maybe.

(Crosstalk)

**Comment 24:** Basswood is not public housing.

**Comment 25:** It is income subsidized housing.

(Crosstalk)

**Comment 26:** Public housing is different from Basswood.

**Comment 27:** I have seen and we know we have several apartment communities that have assistance of some form or another such as low-income housing tax credits or bond financing and I am not sure which one of those, but it is something that I am going to look into and give them a list so that we can compare that.

**Presenter:** That thing that I as an analyst have some challenges with is HUD has provided an assessment tool like all of these indices of opportunity there is really a technical discussion, like the one on the environment is 16 years old, school proficiency is about 4<sup>th</sup> grade only. So they are very specific. The location is drawn from these housing of these vouchers. It is drawn from their databases. There is no way to know how old that is or how new that is. This is drawn from the data

in 2016, but how old is that data? Is it 20 years old, or two months old? I do not know. There is no documentation, but we have shaded some of the Census tracts so you have an idea.

(Presentation)

**Comment 28:** These are total number of complaints. Does HUD keep data on and can you tell us what HUD does to verify complaints or investigate complaints?

(Presentation)

**Comment 29:** These do include the ones that were dismissed?

**Presenter:** Yes and no. Everything is in this diagram and this chart. Both of those which...

**Comment 30:** So all of it is?

**Presenter:** I mean you had to do something to take it forward even if you didn't keep good records, which is usually how it gets dismissed.

**Comment 31:** I was wondering if the City of Lewisville has a Fair Housing Department?

**Presenter:** It is not a department.

**Comment 32:** We do not. There is a Fair Housing Ordinance which just mirrors; it just basically says the same thing as Federal Law. I am designated as the Fair Housing Officer, but not empowered by any city ordinance to investigate. So basically I would still forward somebody to HUD.

**Comment 33:** So you wouldn't take the complaint?

**Comment 34:** I would document it, but I would still forward it to HUD to take any actions or investigation on. I get very few and it has been several years since I have had a single call.

**Comment 35:** I thought we had a neighborhood, a new department?

**Comment 36:** Our Neighborhood Services Department after we reorganized is called Neighborhood Services. That includes our office with Community Block Grants and includes Neighborhood Services Coordinator that is liaison to neighborhood associations and then it also includes building inspectors, code enforcement.

(Presentation)

**Comment 37:** ...Do they know that they are being discriminated against?

**Presenter:** Very good point.

**Comment 38:** Or the practice is so prevalent that they are just used to it and accept it.

(Not Discernable)

**Comment 39:** A lot of them are afraid of retaliation.

**Presenter:** That is right. HUD actually tracks retaliation. There was one retaliation in a protected class.

(Presentation)

**Comment 40:** On the survey what is the cut off on that?

**Presenter:** I am not going to cut it off until the thing is done, but I am done at the end of the month.

(Presentation)

**Comment 41:** In case you were trying to write that down you can also go to [cityoflewisville.com](http://cityoflewisville.com), our website that you are familiar with housing. It will get you there as well or if you saw an advertisement or a flyer for this meeting it is probably on that as well.

(Presentation)

**Comment 42:** Is there a question that pertains to costs, price point type of costs?

**Presenter:** Not really.

**Comment 43:** Are conditions making it difficult for people?

**Presenter:** I think that is irrespective of your protected class. I think we all face that. I think in many ways we all face the same problems, but housing not just here, but nationally it is going crazy. Some places are like ridiculous.

**Comment 44:** I know compared to others Texas is not that bad, but in actually it is really difficult for households that are under \$100,000 to purchase a home.

**Presenter:** I appreciate what you are saying and I think that is absolutely true.

**Comment 45:** So is there any way that that is addressed in this process.

**Presenter:** The availability of housing I think that is more fully addressed in considering the Consolidated Plan. If we were to determine that the price of housing had a disparate impact on certain protected classes the answer would be yes. I mean it may if you can tell me that it does then I can look into it and see if I can demonstrate.

**Comment 46:** Do you know what the average house/home cost for the city is?

**Comment 47:** The median price is \$230,000. The average is...

**Comment 48:** Is that 2016?

**Comment 49:** Yes.

**Comment 50:** That is the most recent. It has been varying somewhere between \$215 and \$230,000. I don't know if we determined if whether that included or not include Castle Hills. So I don't know whether Castle Hills which a lot of people do consider Lewisville, but technically it is not Lewisville yet.

**Comment 51:** Do you know how much median area income is?

**Comment 52:** It is about \$54 or \$55,000

**Comment 53:** Because we work with this HUD program I am always going back to and I am always thinking of the wider area, but I don't recall that number right now.

(Crosstalk)

**Comment 54:** My question is the relationship of HUD with lending like Lending Tree or another one. My question is I have run into a situation where I was looking at modification and I don't know if you have experiences on surveys relating to those lending organizations, but basically they would give my family a modification down to 3 or 2.5 percent that then they add balloon on it of almost the same amount. So we didn't take it, but both the lending people do something like that and charge almost an extra \$49 or \$50,000. Does HUD regulate them?

**Presenter:** There are seven federal agencies that regulate all of the financial institutions. HUD does regulate some. They are typically manufactured home lenders and there are problems with those guys. We see the biggest problems occurring in places like Mississippi.

**Comment 55:** That is a home lending conversation.

**Presenter:** Go back to your question again.

**Comment 56:** Modification, they are going to bring us down to 2.5 percent, but then 15 years from now or 20 years from now you have to pay almost the same price. They call it a balloon payment.

**Presenter:** We did not include earlier years in this analysis. I have been doing it a long time and the housing market was booming in 2005 and 2006, booming, but our analysis we can also do it here. Our analysis we are able to uncover subprime lending activity and the portion of householders that get just like who got denied we can see who got the subprime loans and it was minority's households.

(Presentation)

**Comment 57:** Their justification is that they are this is probably the best for people who are so far down in the hole that they can't get out, but like if you family is doing OK, but why would they just represent it as congratulations you are approved on this.

**Presenter:** If you want my opinion it may not be based in fact, but I can tell you these lenders package lots of loans and sell that as a debt collateralize instrument on the market place and somebody buys that and they shift that risk away.

**Comment 58:** I know when I got into and when I started this job and got into understanding housing a little bit more and lending. I had to shift my mindset. I thought of banks as a place where you went and had a service and I thought they were all very similar, but they do have sales offices and they are trying to sell products.

**Presenter:** Sometimes they will deny you and deny you and deny you and the interest rate will keep going up until there is such a time where you are so emotionally invested that they got you.

(Presentation)

**Comment 59:** Lack of affordable housing and with you finding and seeing the concentration and even if someone does have a Section 8 voucher they are concentrated in certain areas and so I

would like to and I will tell you I work for a housing authority in Denton and we have families who live here in Lewisville and I think that the city needs to look at affordable housing and they also need to look at where it is placed.

**Comment 60:** I think they do have affordable housing in all the surrounding sister cities and Lewisville does have the most number of affordable housing there is. If you compare to.

(Crosstalk)

**Comment 61:** Our appraised values...

(Crosstalk)

**Comment 62:** That maybe the thing that people are probably starting to assume that we don't have affordable housing because the rental values have gone up, but compared to surrounding sister cities we have affordable housing.

**Comment 63:** The problem is...

**Comment 64:** Where do you define that?

**Comment 65:** Affordable housing to me is a home. You can get a home in Lewisville for \$150/170.

**Comment 67:** Where?

**Comment 68:** So what is your definition of affordable housing?

**Comment 69:** Affordable rental housing.

**Comment 70:** Like apartment...

(Crosstalk)

**Comment 71:** There are two problems. When people get vouchers they have a hard time finding a place to use them and I guarantee you that is a problem, but even though Lewisville does have more affordable housing than one of the adjoining cities who have definitely not shouldered their share of the burden, but even though they don't there is still a need for more affordable housing and that is the biggest problem. The problem is we get called all the time and people just cannot find affordable housing. The adjacent cities need to shoulder some of the burden. Everywhere does.

**Comment 72:** I think some of the concentrations along 35 probably has to do with some of the old zoning that we had where a lot of our multi-family was zoned along those corridors and things like that so that is where apartments were built and so that is where they are now. So, we do have sort of and we are constrained a little bit by our building environment.

**Comment 73:** So the zoning rules maybe an area and the reason why we have a concentration.

**Comment 74:** (Not Discernable)

**Comment 75:** That is just what I was thinking too and along the lines of if there is available housing at the rates for sale of \$150,000, where are they and what is the quality of that house?

**Comment 76:** Low quality.

(Crosstalk)

**Comment 77:** And it is probably concentrated in one area.

**Comment 78:** No doubt. It seems to me that that should be expanded.

**Comment 79:** We also have to keep in mind that in Lewisville we, it is struggle and because of everything that is going on between Vision 2025. People according to the survey, people want more homes that they can upgrade from your starter home to your middle home. There is really not going to be a lot of affordable homes, because that is not what the residents wanted. So that is the thing that is being worked on in 2025 according to the survey that we got is people wanting more higher end homes and less multi-family homes and everything like that.

**Comment 80:** You have to be careful as a city in a community, because people that need affordable housing are the people that are working in the schools, they work for the city, they work for the fire department, the police department, they work in the restaurants, so if there is nowhere in your city for people of that income range to live who do those jobs then that means they all have to go somewhere else and try to get transportation to drive back to your community in order to work at your jobs. So is that really what you want the city to look like?

**Comment 81:** I understand that, but those people need to participate in what is going on. These forums are open to everyone so it is the majority of the time it is the homeowners who are invested in this community that own a home that come out and participate in these.

**Comment 82:** That is because most of the lower income people are working two jobs and they don't have the luxury of time.

**Comment 83:** If they don't give their voice then...

**Comment 84:** You should make sure you understand what the purpose of this is. This is to talking about those people that you are talking about. This is talking about minorities, low-income families. So that is what this is about. If your direction and your feedback are all coming from there you might want to rethink the direction that you are coming from, because that is to what this is about. This isn't about building homes for people that want a \$230,000 house.

**Comment 85:** What is the average apartment rent a month is it like \$1,000 or \$1,500?

**Comment 86:** One bedroom is around \$1,500.

(Crosstalk)

**Comment 87:** We did a rent survey and there are some apartment's available in the \$800s, but many of those you still have to pay utilities on top of that, but it is and I don't know the average pretty much from the high \$700s to \$1,350.

**Comment 88:** Families can barely afford to rent those.

**Comment 89:** Right and the places with those units and all apartments are pretty full.

**Comment 90:** Even a little starter home...

**Comment 91:** Fox and Jacobs, because I have lived in Lewisville for almost 40 years. The little Fox and Jacobs starter homes I think they rent for like \$1,500 a month.

**Comment 92:** That would be right, but I am just talking about apartments.

(Crosstalk)

**Comment 93:** We are landlocked and what people want moving forward it not conducive to being done, but other cities around us that have way more land where they can accommodate affordable housing.

**Comment 94:** So I think one of the problems is we were developed mostly in the 80s and the 90s when suburban development was very like get a big tract of land and put a bunch of houses that were all the same size and so you don't have the diversity of different houses and sizes. Here is a multi-unit and here is a single family mixed together and that was a sort of and now we have the land problem where and if we did have zoning laws that said you have to create multi-family and single family in a development we just don't have that land. So we have to you known it is very hard to redevelop single family areas because everybody owns their own little piece.

**Comment 95:** You do that over time.

**Comment 96:** We do have a development, but it just kind of lends itself to concentrations in certain areas.

**Comment 97:** I think that first of all they did an incredible job when they rebuilt the City Hall. It is just incredible, but as that side of town grows you are going to see a lot of transition from those older home on big lots to people buying and building the commercial on the first floor and three and four stories. When they do that they have got to incorporate affordable housing somewhere. It may a lot a of the land might not be there, but there is going to be redevelopment. There are other apartment complexes in the city that really the you know...

**Presenter:** Did you have a question?

**Comment 98:** Can you go back to the list of potential observation. I think I heard somebody say that they might be under reporting of fair housing issues. Over eight years there are what 40?

**Presenter:** Yes, I did say that.

**Comment 99:** So over eight years there are only 40 and she hasn't heard of any in several years. So the point that people are not coming out and saying anything, maybe one of the points we should make is questioning the number of complaints is that an actual fair number and if not then we need

to educate our population about fair housing issues. (Crosstalk) Did you know that you are being scammed and here is your form to make your voice heard?

**Comment 100:** By and large for the most part people who live in this part of the metro-plex aren't looking to find the least expensive housing that is available in the area. They are just looking to be able to afford where they live. If a household has an income of \$60,000 or \$70,000 where can they purchase a home? Are they condemned to rental for the rest of their lives? That is the point.

**Comment 101:** You can buy a home...

**Comment 102:** I don't think so. Which is a decent living, but can you buy a home with that? Not likely.

**Comment 103:** Is that the objective for HUD is home purchase or just having a place to live?

**Comment 104:** I think it is both.

**Presenter:** For this study we are trying to determine how people are treated in the housing transaction whether that is homeownership or rental. If they are treated and I don't want to say incorrectly, but say improperly then what can we do about that? On one hand we certainly need to educate people so they understand how they are being treated and then they can do something about that, but we also need to educate those providers whether that is a financial instrument or a rental lease so they too understand.

**Comment 105:** I honestly don't know if that is a correct number of complaints or not. My knowledge is that I know people who are familiar, but housing conditions in Lewisville.

**Comment 106:** I am sure it is off. Those people first of all I can tell you are not educated and don't have the time to go get trained, because they are too busy just trying to put the food on the table.

**Comment 107:** They don't know. They have to deal with income taxes.

**Presenter:** Your point is really well taken. Somebody who is denied a place to rent they just go and find the next one.

(Crosstalk)

**Comment 108:** Then they go and try to find something in the concerted area where people look like them.

**Comment 109:** I just wanted to add the information as far as average family household income in Lewisville. I looked it up online and I am seeing about \$58,000 and then the HUD income limits that we use to base on first-time home buyers assistance program is the Dallas-Fort Worth statically area and that is about \$72,000 and that is a household of four and the marker.

(Presentation)

**Comment 110:** I am a realtor by trade and when we start a transaction all of our disclosure is upfront. So we tell our clients about fair housing laws and what their rights are. Are apartment complexes not doing that? Are they not required to tell people when they come into fill out an application that there are fair housing laws?

**Presenter:** I think that is a very good question.

**Comment 111:** I understand that the greater Dallas...

**Comment 112:** I just signed a new apartment lease and if we look through everything there is mention of any kind of discriminations, but that wasn't necessarily pointed out to me.

**Comment 113:** There should be a disclosure in Spanish and English.

**Comment 114:** I think the majority of the time people in the apartment is credit and I think they are being denied for credit. I am assuming it is.

(Crosstalk)

**Comment 115:** I know that the apartment associations provide fair housing training and I am not sure what the requirements for leasing agents are to get that. I know a lot of property; the corporate owned apartments will make sure that their managers and leasing agents occasionally get fair housing training.



December 30, 2016

Mr. Jamey Kirby  
 Grants Coordinator  
 City of Lewisville  
 Neighborhood Services  
 P.O. Box 299002  
 Lewisville, TX 75029  
 VIA U.S. MAIL AND EMAIL TO: jkirbey@cityoflewisville.com

RE: City of Lewisville's Assessment for Fair Housing Report

Dear Mr. Kirby:

The Inclusive Communities Project (ICP) is a not-for-profit organization that works throughout the Dallas region for the creation and maintenance of thriving racially and economically inclusive communities, expansion of fair and affordable housing opportunities for low income families, and redress for policies and practices that perpetuate the harmful effects of discrimination and segregation. A major aspect of our work is operation of our Mobility Assistance Program (MAP), a housing mobility counseling program that aids low-income families who use housing choice voucher (HCV) subsidies to supplement their rent. Through this program, ICP has gained immense insight about the types of challenges that these families (primarily families of color with children) face as they seek to rent in well-resourced, safe, high opportunity areas of the Dallas Metroplex.

This letter follows our email of December 19, 2016, in which we asked a few questions following our cursory review of the online draft Assessment for Fair Housing (AFH). Although the City has not had the opportunity to address our questions, we hope the City will consider our following comments as you move towards finalizing your AFH report.

#### **The City of Lewisville**

It has been pointed out in the draft that the City of Lewisville's dissimilarity index is markedly lower than that of the region. While this fact is true, it should not be overlooked that Lewisville has quickly become more segregated. Between 1990 and 2010, the Non-White/White dissimilarity index almost doubled while jumping from 17.41 to 29.78. This growth in segregation should remain at the fore as the City moves forward in addressing its fair housing issues.

#### **The Region**

The draft provides general demographic trends for the Dallas-Ft. Worth-Arlington CBSA region on page 25 as compared to population growth trends in Lewisville. One of the questions posed by ICP in its December 19, 2016 correspondence, however, asked to what extent has the City

#### **Inclusive Communities Project**

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engaged (or plans to engage) other jurisdictions in the region to address the “Disparity in Access to Opportunity” within the City and the region. The City of Lewisville operates not only within Denton County but within the Dallas Metropolitan area. Families with whom ICP works live in Lewisville and various parts of Collin, Denton, Dallas, Rockwall, Rockwall, Tarrant and Ellis counties. Like most families, they seek the best housing options regardless of strict geographic boundaries. While their housing searches have always been challenging, with landlords often turning away qualified applicants simply because they use housing choice vouchers, the influx of people to the Dallas region has greatly diminished the number of available rental units. Similar to comments made by others at the November 15, 2016 community input meeting, ICP’s housing mobility counselors struggle to identify affordable units in the Lewisville area and region.

#### The City of Lewisville’s Contiguous Neighbors

Compared to other political subdivisions within Denton County (except City of Denton), Lewisville serves more renters than many neighboring towns/cities in Denton County. The Town of Flower Mound, a HUD CDBG grantee adjacent to the east of Lewisville where racial and ethnic dissimilarity indices outpace Lewisville’s, has no multifamily rental units that are accessible to housing voucher holders. Several other neighboring towns within the county lack the same type of housing which, if made available, would likely serve low income families of color.

Lewisville ISD (LISD) uses the City’s and neighboring towns’ municipal boundaries to create segregative attendances zones for public school students. School competence for Blacks living in Lewisville attending LISD registers at 54.43. School competence for the few Blacks living in Flower Mound, as well as for all races, is significantly higher and falls at 86.25. With LISD operating the public schools in both jurisdictions, this data suggests that the education of Black students in the Lewisville area is separate and unequal and guided by the area’s segregated housing patterns.

While the City of Lewisville seeks to make more affordable units available within its boundaries, it should engage neighboring cities - where Lewisville residents work and contribute to neighboring economies - about taking steps to make affordable rental units available as well.

#### The City of Lewisville’s Non-Contiguous Neighbors

The City’s close proximity to such growing municipalities as Plano (located in both Collin and Denton counties) gives rise to inclusion of certain data and information regarding the region that is beyond the City’s contiguous neighbors. Both Lewisville and Plano fall within the same immediate region. In fact, LISD also serves parts of Plano, TX, a fact made apparent when an April 9, 2015 letter from LISD opposed the development of a low income tax credit project (the Astonia) while alleging capacity concerns. The Plano City Council premised its negative decision on the contents of the LISD letter and ultimately blocked development. The project would likely have made units available to low income persons, including voucher holders and other protected class members. This was an egregious act by LISD. The City should consider its role in

the region, through its membership on the North Central Texas Council of Governments and in relationship with its other public agencies with whom it partners.

#### **Goals & Actions towards Achievement**

##### Unavailability of Affordable Units

Of the City's seven identified "fair housing issues" on page 102 of the draft, at least three squarely relate to the unavailability of affordable units for protected class members. These include:

1. Limited supply of affordable housing, especially for minorities and seniors
2. Prospective discriminatory practices and policies; NIMBYism
3. Denial of available housing in the rental markets; discriminatory terms, conditions, or privileges relating to rental

The City's proposed actions of promoting partnerships for development and reviewing land use policies that impact the siting of affordable housing are a start. But these beginning steps will not likely result in increasing the number of available units. As noted on page 20 of the draft report, Lewisville has a concentration of Blacks and Hispanics in certain pockets of the City. Of Lewisville's rental units, many tend to be concentrated in the central part of the City. Making way for and/or incentivizing affordable rental development in other parts of the City would help deconcentrate the current rental housing stock.

Incentives, such as inclusionary zoning/housing policies, would help attract partners and ensure development of units affordable to persons at or below 50% AMI. Such policies could include the requirement that a developer accept a certain percentage of voucher holders who qualify for rental units under reasonable screening criteria. Consideration of multifamily properties in high opportunity areas seeking to rehab with city support might also qualify. An inclusionary zoning/housing policy could also be applied to non-residential developers seeking city support who would in turn contribute to a municipal housing trust fund that aids renters in accessing affordable units.

ICP's experience has shown that the creation of affordable rental units in high opportunity areas, like those financed with low income housing tax credits, does not necessarily mean protected class members will be targeted for or made known about the units' availability. ICP's Mobility Assistance Program has helped close this gap in the Dallas Metroplex through its housing mobility counseling services. The City, and its partners, should consider engaging housing mobility services as rental units in high opportunity areas are marketed within the City and neighboring towns.

Following its proposed review of land use policies, the City should seek to amend land use and any other policies that lend themselves to making multifamily housing rental units unavailable to low income persons and protected class members.

**Fair Housing Outreach & Education**

At least two of the draft report's identified "fair housing issues" relate to public education of fair housing law. A reading of the table on page 102 of the draft makes it appear as though education and outreach will only occur once per year. Review of the comments from the November 15, 2016 public meeting illustrate that ignorance of fair housing law calls for more than annual outreach and education.

The City should take a more comprehensive approach to fair housing education needs of its residents and businesses operating within its jurisdiction. A comprehensive approach would target audiences for outreach and education on a more than "once a year" schedule. Coordination with the North Texas Fair Housing Center may provide expertise on the content of the education. ICP could make itself available to voucher holders who seek more information about their fair housing rights. Community leaders who participated in the AFH process and others should be engaged to help shape outreach strategies.

**Evaluating Progress**

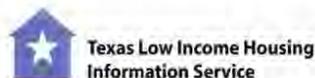
Determining how and when the City will evaluate its progress should be considered at the outset and made known to the public. Additionally, the City should review the goals and proposed actions stated in previous Analysis of Impediments to Fair Housing reports to evaluate the impact of the goals and actions that were implemented, if any. If previously proposed actions were not implemented, knowing why may be helpful going forward. If you have questions regarding our comments, we welcome them. Thank you for allowing us to participate in Lewisville's AFH process.

Sincerely,

Demetria L. McCain  
President

[dmccain@inclusivecommunities.net](mailto:dmccain@inclusivecommunities.net)

CC: Elizabeth K. Julian, Founder & Senior Counsel, ICP  
Nicole Rolfe, Mobility Assistance Program Director, ICP



January 2, 2017

James Kirby  
 Grants Coordinator, Neighborhood Services  
 City of Lewisville  
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 Lewisville, Texas 75029  
 VIA EMAIL: jkirby@cityoflewisville.com

Comments on the City of Lewisville's Assessment of Fair Housing

Dear Mr. Kirby:

Thank you for the opportunity to comment on the City of Lewisville's Assessment of Fair Housing (AFH).

The Texas Low Income Housing Information Service (TxLIHIS), a non-partisan, nonprofit corporation, has worked in Texas with community leaders in neighborhoods of people of color living with low-incomes to achieve affordable, fair housing and open communities for over 25 years. Citizen engagement, civil rights enforcement and fair housing are at the center of our work.

Texas Appleseed (Appleseed) is a non-partisan, nonprofit, 501(c)(3) public interest justice center. We work to change unjust laws and policies that prevent Texans from realizing their full potential, including ensuring access to fair housing choice and equal opportunity.

We understand that Lewisville is the first jurisdiction in Texas to submit an AFH under the new rule and process, as well as one of the first 30 jurisdictions in the country to do so, and that there are limited examples of completed Assessments and HUD decisions that would provide guidance based on specific plan deficiencies or exemplary analyses. We anticipate that the AFH will need revisions for that reason alone. We also recognize that Lewisville is a relatively small, if growing, jurisdiction with limits on its resources and capacity. However, as one of the first

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<sup>1</sup> HUD's AFFH Rule Handbook does include a number of examples of responses to AFH Tool questions and prompts.

jurisdictions in the nation to submit an AFH, it is also important that Lewisville help set the standard for what a complete and well-executed AFH should look like.

The version of the AFH presented for public comment is incomplete. It includes the transcript of only two public meetings out of four, the participants at those meetings are not identified, specific questions in the AFH tool are not answered, and there is only cursory analysis of a limited number of contributing factors in the AFH. From the public meeting transcripts included in the AFH, the City and its residents seem to have a broader and more sophisticated understanding of fair housing and public outreach and participation than is reflected in the AFH, and to have identified a number of fair housing issues that are not included at all. The public meeting transcripts highlights the lack of history, context, and analysis in the AFH, and indicates that there is a great deal of local knowledge and data that was not included.

#### I. Lack of Adequate Community Participation Process

The outreach process described in Section III is inadequate on its face, consisting of two Fair Housing Forums, a public review meeting, a final presentation, and an internet survey in English and Spanish. The AFH Tool requires outreach that “encourage[s] and broaden[s] **meaningful** community participation” (emphasis added), efforts to reach populations generally underrepresented in the planning process, efforts to reach populations with Limited English Proficiency (LEP), and consultation with local organizations.

- a. There were no efforts to consult with local organizations. The AFH states that it will draw the names of any organizations that participated in public meetings from sign-up sheets. This is not “consultation” in any sense of the word. The consultants should have made a list of organizations in the City and surrounding area, including fair housing, civil rights, housing, and other organizations that serve members of protected classes, and solicited their input directly.
- b. The required description of efforts made to reach the public, including underserved populations, is not included.
- c. The AFH describes only one outreach activity in addition to public meetings: a survey that was distributed largely over the internet. Again, there is no description of efforts made to inform the public about the availability of the survey. At the November 1, 2016 public meeting, commenters made a number of comments about the survey and survey outreach, including the lack of outreach to renters, the necessity for translating the survey into Chin, the lack of outreach to lower income populations and people of color suggestions that the survey be distributed at churches and through organizations that serve specific protected classes, how people who do not use the internet or email will access the survey, issues with translation, the lack of Lewisville-specific questions, and the failure to collect demographic information from survey participants. While there is no description of outreach efforts, the responses to the survey speak for themselves. While it is unclear what the category “missing” covers, there is no category for “resident” and the next largest number of respondents, by a significant margin, was local government employees/officials. The majority of responders were white

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homeowners without disabilities.

The survey questions are not included in the AFH, making the survey difficult to evaluate. Assuming the majority of the survey questions are those in Tables II.1 to II.6, the questions are not designed to solicit useful information beyond general awareness of fair housing. For example, it is unclear whether concepts like fair housing testing were defined and even the large number of local government respondents were overwhelmingly unfamiliar with barriers in local land use laws or zoning, although zoning is clearly identified as a fair housing issue in the AFH, in past AIs, and in public comment. There are no questions (included in the tables) designed to solicit meaningful identification of and input on barriers to fair housing choice in Lewisville from people who are not experts on fair housing law (e.g. Do you think all neighborhoods are treated equally? Is the infrastructure in your neighborhood better or worse than other neighborhoods? Have you ever been discouraged from looking for housing in a particular area of the City?). Although the survey seems to have collected some demographic information if the City was able to identify that most respondents were white, there is no analysis of responses by protected class, which elides differences in experience between populations, and does not identify which populations need specific types of fair housing outreach and education. Limiting the survey to questions about awareness of fair housing, and doing so in a way that ensured most respondents would not respond in the affirmative also overemphasizes lack of awareness of fair housing as a barrier and outreach and education as a meaningful response, while downplaying structural issues and a history of government decisions (not exclusive to Lewisville) that have created and maintained the most significant and urgent barriers to fair housing choice.

- d. Despite the identification of a LEP Chin population well over the threshold for language access, the survey was not translated into Chin. While there were identified reasons that that simply trying to translate the survey into Chin might be ineffective, there is no description of other outreach to this population to solicit their input, despite public comment specifically identifying issues affecting this population.
- e. There is no discussion of how input was solicited from people with disabilities or how the meetings and survey were made accessible.
- f. There is no analysis of the success of eliciting meaningful community participation or reasons for low participation in the process.
- g. The summary of public comments is limited to a bullet pointed list and there is no summary of comments or views not accepted and why.

It is unclear how the City will submit the AFH to HUD given the lack of responses to many of the AFH Tool questions. If those responses exist and have not been included in the public comment version of the AFH, again, the public comment process was inadequate.

## II. Inadequate Assessment of Past Goals, Actions, and Strategies

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The discussion of past impediments and actions does not include information about whether the City carried out the recommended actions. There is a brief discussion of “additional actions” but nothing on the actions steps required by past AIs. This section lists impediments and action steps, but fails to answer all four questions in IV.1.

### III. Inadequate Fair Housing Analysis

The fair housing analysis is the heart of the AFH, and what enables communities to identify barriers to fair housing choice, meaningful actions to address them, and meet the fair housing planning requirements set forth in 24 C.F.R. §§5.150 through 5.180. Without a complete and substantive analysis, the City’s AFH does not meet those standards.

Section V. (Fair Housing Analysis) is essentially a recitation of descriptive data. While the analysis and presentation of HUD-provided data and maps for the City of Lewisville is required and useful, it is merely the starting point for a substantive analysis of why the data and maps look the way they do and how those contributing factors can be addressed. For example, the fact that a specific level of segregation exists is relatively meaningless and cannot suggest actions to address that issue without context. HUD’s third question in each subsection (“Contributing Factors”) of Section V is designed to flesh out this context and facilitate meaningful analysis. If a contributing factor to segregation is the historical failure to invest in public infrastructure and services in areas where people of color are concentrated – lack of engineered drainage, for example which results in frequent flooding, or zoning laws that allowed an environmental hazard to be located in a neighborhood primarily occupied by people of color – there are specific actions a community can and should take to address those barriers. Lewisville’s AFH does not include context or explanation for disparities identified by the data.

*Question 3 has not been answered for any of the areas covered by Section V.*

Again, the frustrating thing about the failure to conduct this required analysis is that there is clearly a great deal of local knowledge about the contributing factors to the presented statistics. Transcripts of the public hearings alone include information about fair housing issues including:

- refugee populations;
- reasons for lack of participation by lower income populations in public processes that contribute to plans that do not reflect the real needs of the community;
- the condition of housing affordable to specific populations protected by the fair housing act;
- lack of access to accessible and affordable housing;
- indications there may be issues of discrimination based on religion;
- invisibility of housing discrimination to victims and problems with relying on complaint data;

- concentration and location of Housing Choice Voucher holders<sup>2</sup> and affordable housing;
- impact of historical zoning and land use decisions;
- Vision 2025 does not reflect the actual needs of the community or incorporate fair housing and civil rights concerns;
- NIMBYism; and,
- need for anticipated redevelopment to incorporate affordable housing.

Very few of these issues are included or addressed in the AFH, and there is no explanation for their exclusion.

“Local data must be used to supplement HUD provided data and HUD requires program participants to include such data in their AFH. Local knowledge includes, among other things, any information obtained through the community participation process. **Local data and knowledge provide local context for the HUD-provided data, and can be a valuable means of supplementing the HUD-provided data and is important for providing context in an AFH.**” (HUD AFFH Rule Guidebook at 47, emphasis added.)

In addition to the local knowledge, the AFH fails to incorporate local data, particularly in the section on Environmentally Healthy Neighborhood Opportunities. Our organizations have repeatedly commented to HUD on the inadequacy of examining solely air quality as a measure of environmental health, however, this is an area in which there is easily accessible local data, and our organizations have mapped, for example, the locations of Superfund sites, landfills, and industrial sites on the toxic release index using public information from the Texas Commission on Environmental Quality (TCEQ) and other public sources. The Environmental Protection Agency (EPA) has EJSCREEN, an environmental justice data and mapping tool using national data sets, for at least a screening level evaluation of potential issues related to lead paint and water quality issues, as well as air quality (<https://www.epa.gov/ejscreen>).

Additional issues in the public comment version of Section V. include:

- a. The AFH should include a demographic analysis of the population by age. Lewisville identifies a growing senior population, but not the demographic breakdown of that population. Senior housing is often more acceptable to NIMBY groups than family housing, so the City needs to ensure both that it is not overbuilding senior housing and excluding families with children, and that senior housing is not disproportionately serving one race or ethnic group in a way that results in discrimination on the basis of race or national origin.
- b. While there are no areas that meet the definition of R/ECAP, Lewisville does have concentrations of people of color and poverty, which largely overlap. The AFH should include a map overlaying poverty on race/ethnicity in order to identify specific areas of concentration. This analysis was conducted in order to determine whether there were

<sup>2</sup> Discrimination against HCV holders is generally a proxy for discrimination based on race, national origin, disability status, and familial status.

- R/ECAPs in the City, it is unclear why this information was not included, and its exclusion downplays the issue of the concentration of poverty in communities of color. Levels of segregation identified by the dissimilarity index are low to moderate, but the AFH identifies increasing segregation and the City becomes more diverse and increasing poverty. These are red flags, but there is no discussion of how to prevent higher levels of segregation and concentration of poverty (outside of the ways in which increasing affordable housing units).
- c. The choice to use Census Tract level data to calculate the dissimilarity index instead of Census Block Group data is confusing. Lewisville is not a large city or a county, using the smaller geographic base is more appropriate. We understand that using smaller geographic units “produces dissimilarity index values that tend to be higher than those calculated from larger geographic units”, but producing lower dissimilarity index values is not a good reason to use those larger geographic units absent a reason that doing so is more reflective of actual segregation levels – which is not included in the AFH. We understand, and HUD acknowledges in its AFFH Rule Guidebook that there are problems with the dissimilarity index as a measure of segregation and that context is important to interpreting the results, particularly spatial patterns of segregation.
  - d. The analysis of HDMA data does not include disparities in who received prime vs. subprime loans.
  - e. How school attendance zones are drawn is a policy that affects access to high performing schools. These zones may have originally been drawn while schools were legally segregated, or in order to preserve de facto school segregation, and continue to disproportionately affect students of color even if there is no current discriminatory intent.
  - f. The analysis of job access does not include any information on the type of jobs available in the City, the necessary qualifications for those jobs and the level of pay, and whether available transit connects people to those jobs. There is also no discussion of whether and how many residents commute to Dallas/Fort Worth for work, and whether there are transit options that enable that commute. Again, the lack of context makes this factor difficult to analyze.
  - g. Transportation Opportunities means not only access to transit, but access to transit that connects people to opportunities like jobs, services, grocery stores, and schools. The AFH looks only at access to transit and fails to answer questions ii. and iii. in this subsection. We also note that the lack of access to transit in higher income white concentrated areas is often deliberate and used to exclude low-income families and people of color from specific neighborhoods.
  - h. The analysis of the location of assisted housing is incomplete. The AFH states that publicly supported housing is disproportionately located in areas of the City with concentrations of African-Americans, but there are no maps showing this overlay, or the overlay with poverty. These maps are also missing for HCV holders and LIHTC properties.
  - i. Data on the demographic composition of developments funded through the LIHTC program is available in the Texas Department of Housing and Community Affairs’

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Annual Housing Sponsor Report. The AFH should also include the location of 4% vs. 9% developments, and senior vs. family developments, and the racial composition of those developments.

- j. The Disability and Access Analysis identifies a number of disparities in access to opportunity for persons with disabilities, which are not addressed in the section on goals and priorities.
- k. While some analysis of differences between the region and the City are identified, there is no accompanying context or analysis. For example, a contributing factor to the concentration of affordable and assisted housing in cities is often discriminatory opposition to this type of housing in surrounding areas.
- l. There is no discussion of disparities in infrastructure, public services, or other indicators of neighborhood equity.

#### IV. Fair Housing Goals and Priorities

We have identified several ways in which deficiencies in the AFH negatively affect the City's ability to set meaningful goals and prioritize them appropriately, including the survey's orientation toward identifying lack of fair housing knowledge as a major barrier, and the failure to answer a large number of the required questions in the AFH tool and to include context, analysis, and local knowledge and data. The City has, despite these deficiencies, included two important contributing factors identified by stakeholders – resistance to affordable housing and discriminatory actions in the marketplace – in its list of priorities. It also fails to address neighborhood equity issues beyond local land use rules, or to commit the City to any meaningful actions to address its barriers to fair housing choice beyond a review of land use policies and seminars and trainings.

Generally, Table V.2 City of Lewisville Fair Housing Goals, Issues, and Proposed Achievements does not contain sufficient metrics, milestones, or time frames to evaluate whether the City is making progress toward its goals.

- There is no detail about the audience or content of the proposed seminars, training, and outreach for different goals, or who will select and present the content. For example, our assumption would be that those trainings would be addressed to landlords in order to reach the goal "Reduce Discrimination in Rental Market", but that is not clear from the Table.
- The goal "Enhance Financial Literacy" is not appropriately related to either the fair housing issue of high denial rates for racial and ethnic minorities or the contributing factors of lending discrimination, private discrimination, or access to financial services. While increasing financial literacy may be good public policy generally, increasing the financial literacy of individual borrowers does nothing to address lending discrimination or lack of access to financial services. The issue is that lenders discriminate against individuals based on their protected class status, not on income or credit score. There is extensive research showing that racial and ethnic minorities and

women are more likely to have loans denied or be steered into subprime loans even when their qualifications are exactly the same as those of white or male borrowers. Similarly, credit education and outreach to individual borrowers does nothing to address inequitable access to credit and home lending or the discrimination on which those disparities are based.

- One of the major issues in addressing housing discrimination is that often victims are unaware that the discrimination is taking place. If an African-American is told no units are available, how can they know that White renters are being told units are available? While there is value in increasing public knowledge about fair housing, it will not adequately address the goals “Enhance Fair Housing Program and enforcement” or “Reduce Discrimination in Rental Market.” The only way to identify and address a great deal of housing discrimination is testing. A more appropriate way for the City to work on these goals would be to contract for testing.
- Increasing the supply of affordable and accessible housing cannot, on its own, address fair housing issues. Fair housing and affordable housing are not the same thing. While increasing the supply of housing prevents the exclusion of low-income families in classes of persons protected by the Fair Housing Act from the City generally, the location of that housing within the City determines fair housing and civil rights compliance. “Promoting the construction of new, redeveloped, or rehabilitated housing” is a good action step and addresses the disparate negative impact of the lack of affordable housing on protected classes, but it is not clear how the City will address siting issues – particularly the contributing factor of resistance to affordable housing. The review and revision of local land use policies is one of the meaningful actions the City should take to address siting issues (although it is unclear why doing so will take five years and that analysis should in fact have been included in the AFH), but stakeholder input identified Vision 2025 and NIMBYism as other contributing factors which are not specifically addressed by Table V.2.

Again, we want to acknowledge that the City is in the position of being one of the first jurisdictions in the country to go through a new and difficult assessment process, and our organizations would expect revisions to these first AFHs to be necessary for that reason. We also reiterate our impression that much of what is missing from the AFH is clearly available in the form of local knowledge and data. If our organizations can be helpful to the City by suggesting possible data sources or identifying emerging best practices or examples, please don't hesitate to contact us.

Sincerely,

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Fair Housing Project  
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John Henneberger  
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TxLIHIS

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