



FAIR HOUSING PLAN

**ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING
CHOICE**

Updated August 2017

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Executive Summary

The U.S. Department of Housing and Urban Development (HUD) requires that all plans submitted for funding include a certification to affirmatively further fair housing. During the 5-year Consolidated Planning process, CDBG entitlement jurisdictions, such as New Braunfels, must undertake the development of a Fair Housing Plan (FHP) to be a framework for monitoring the activities to take place in affirmatively furthering fair housing. The jurisdictions are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for all persons and neighborhoods to receive the same level of services and amenities throughout the jurisdiction;
- Promote housing that is accessible to persons with disabilities; and
- Comply with all federal laws and requirements regarding fair housing a non-discrimination.

In order to develop a Fair Housing Plan, the jurisdiction must develop an Assessment of Fair Housing (AFH) that involves and addresses the housing and living environment concerns of the entire community.

This document includes the City of New Braunfels' Assessment of Fair Housing and the Fair Housing Plan and consists of the following:

1. Community involvement in developing the plan
2. Assessment of past goals and actions
3. Current assessment of fair housing
4. Fair housing priorities, goals, plan and action steps

Community Involvement

Under the new Affirmatively Furthering Fair Housing (AFFH) rule, HUD requires that the public is involved in the development of the Fair Housing Plan and must comply with the City's Citizen Participation Plan. The City of New Braunfels has routinely encouraged participation by all residents, particularly persons of low- to moderate-income and members of a Fair Housing protected class. During the PY 2015-2019 Consolidated Planning process, the City of New Braunfels conducted a number of activities to involve residents in the development of both the Consolidated Plan and Fair Housing Plan. During the actual post-Consolidated Plan development

of the Fair Housing Plan, New Braunfels has held a stakeholder meeting to discuss fair housing and affordable housing issues. Subrecipients are educated on fair housing issues and law. The City issues a Fair Housing Month proclamation each April. The City has a Fair Housing Officer that can assist with complaints and provide information to residents.

Survey

The City provided a survey in English and Spanish for residents and other interested parties to complete. The survey included questions about the community and housing needs in New Braunfels as well as incidences and perceptions of housing discrimination. The surveys were available on-line as well as paper copies available at City Hall, the public library and community service agencies. Public notices for the surveys included links to on-line access and physical locations for acquiring paper copies. Copies of the survey are included in the attachments. No one completed the Spanish on-line survey or either paper surveys. Below is a summary of the survey responses. The detailed op-ended responses are in the body of the full plan.

Table 1 – Results of Public Survey

Have you or others you know:	Yes	No	DK/NA
Experienced inability to rent or purchase a home due to race or ethnicity	4	52	19
Experienced inability to rent or purchase a home due to national origin or perceived national origin	2	53	20
Experienced inability to rent or purchase a home due to a physical or mental disability	2	53	20
Experienced landlords refusing to make reasonable exterior accommodations for a tenant with a physical or mental disability	4	51	20
Experienced landlords refusing to allow disabled tenant to make reasonable interior accommodations/alterations	3	52	20
Experienced landlords refusing to allow service or assistance animals for disabled tenants	3	49	23
Experienced inability to rent or purchase a home due to being over 60 years of age	3	51	21
Experienced inability to rent or purchase a home to do household structure (unmarried partners, presence of children, single parents, pregnancy)	3	51	21
Experienced refusal to be shown a home or acquire a mortgage to purchase in a predominately minority neighborhood	2	52	21
Experienced refusal to be shown a home or acquire a mortgage to purchase in a predominately white neighborhood	2	52	21
Experienced inability to get homeowner's insurance for housing in a predominately low-income or minority neighborhood	1	54	20

Refusal of landlord to accept Section 8 Housing Choice Vouchers	8	47	20
Experienced lower quality schools in low-income or minority attendance zones	8	47	20
Experienced a lack of or lower quality/aged infrastructure, public transportation and other public amenities in low-income or minority neighborhoods	16	39	20
Experienced a lack of private-sector amenities (grocery stores, drug stores for example) in low-income or minority neighborhoods	13	40	22
Experienced discrimination based on location and/or protected class status when complaining about public infrastructure or safety issues	7	48	20
Experienced slower response times for police, fire, EMS in low-income or minority neighborhoods	3	51	21
Experienced discriminatory actions or verbiage by public servants, including City workers, police, fire personnel, EMTs, and/or elected officials	3	50	22
Experienced hate crime(s) within or surrounding schools	4	50	21
Experienced hate crime(s) within certain neighborhoods	3	50	22
Are there areas in New Braunfels with:			
High concentrations of low income or protected classes that don't have the same public facilities or infrastructure as the rest of the community?	11	18	46
Are there areas in New Braunfels with high concentrations of low income or protected classes that don't have the same police, fire and/or EMS protection as the rest of the community?	2	24	49
Are there negative facilities or infrastructures (landfills, toxic waste dumps, sewer treatment plants, prisons, dangerous/unhealthy industries, etc.) located in or adjacent to neighborhoods with concentrations of low income or protected classes?	8	23	44

Public Meetings

In addition to the public hearings for the Consolidated Planning and Annual Planning processes, the City conducted a stakeholders meeting to discuss fair housing issues and laws.

Groups Consulted

The City of New Braunfels contacted a number of agencies, organizations and stakeholders in the development of both the Consolidated Plan and Fair Housing Plan. The following list includes those contacted and the results of the contacts:

Table 2 – Responses from Stakeholders

Agency	Topic & Responses
City of New Braunfels Fair Housing Officer	In the past year, the City has not received any fair housing complaints; discussed outreach and education efforts for the upcoming year
Comal County Senior Center	Needs of elderly in maintaining housing, finding affordable assisted living and limited number of senior only rental properties; agency has not heard any fair housing complaints from its members
San Antonio Food Bank	General discussion of issues for low-income residents
Connections	Housing issues for youth aging out of foster care and homeless youth; issues centered around not being able to rent without a co-signer due to their age; lack of credit and work history
CASA	Not aware of any fair housing issues for their clients and families; mentioned that larger units were hard to find and often prevented grandparents from being able to have the children in their home
Family Life Center	Works with those at risk of homeless due to lack of resources for rent and utilities; was not aware of any fair housing issues
Comal County Crisis Center	Discussed needs of victims of domestic violence and sexual assault; main issue is lack of funding for deposits and finding affordable units; some landlords do not want to rent to DV survivors because of fear of the abuser destroying their property

Comal County Habitat for Humanity	Discussed needs of low income homebuyers; occasionally encounters NIMBY when purchasing lots and constructing houses
McKenna Foundation	General discussion of housing needs; Foundation is not aware of any fair housing complaints
Family Promise	Housing needs of homeless families
Hill Country Community MHDD Center	Housing needs for people with disabilities; some discrimination against people with mental illness; for physically disabled, main issues are finding accessible units and landlords refusing to make accommodations or allow service animals
Hill Country Veterans Services	Discussed needs of veterans and their families
LULAC Council 4217 of New Braunfels	Discussed racial issues for the Latino community; no official complaints but did mention that larger families have a very difficult time finding rental units
NAACP San Antonio	Discussed racial issues in securing housing; has not received any complaints from New Braunfels residents
Fair Housing Council of San Antonio	No response
New Braunfels Housing Authority	Agency has not received any complaints; Voucher holders are able to find rental units but single family units are scarce or priced above the FMR
Community Council of South Central Texas	Discussed issues of poverty, affordable housing; agency's stated that the biggest issue is financial which is not a fair housing violation
Disability Rights Texas	Issues discussed were the lack of accessible housing; housing located near services and amenities; landlords not wanting to make reasonable accommodations

Assessment of Past Actions

During the past years, the City of New Braunfels has engaged in a number of on-going activities to affirmatively further fair housing. Included in the actions are:

- The City established a Fair Housing Ordinance in line with the Federal Fair Housing Act and State of Texas Fair Housing Ordinance.
- As part of both the local ordinance and Federal requirements, the City has established a Fair Housing Officer charged with leading the activities to affirmatively further fair housing, develop the Fair Housing Plans, inform the public about fair housing, receive and investigate complaints, and assist complainants in submitting documentation to the proper authorities. The Fair Housing Officer maintains a log of all inquiries and complaints, with the issue, City's participation, and resolution.
- The City has provided Fair Housing posters to non-profit agencies for posting in their facilities.
- Within the CDBG program, the City has established a housing rehabilitation program aimed at elderly and/or disabled homeowners. This program affords the owners the opportunity to remain in their homes, their housing of choice, in a safe and healthy environment, as well as maintain the home's value and the value and integrity of the neighborhood.
- The housing rehabilitation program also provides accessibility modifications to ensure that the homes are ADA compliant and accessible to residents and visitors who have a physical disability.
- The City also provides funding for emergency rent/utility assistance to prevent homelessness.
- Down payment and closing cost assistance is provided with City CDBG funds through a non-profit subrecipient.
- The City funds a number of projects for agencies sheltering, serving, and accessing housing for the homeless.
- Each year, the City conducts public hearings for the CDBG program and Fair Housing is one of the topics discussed in order to better inform attendees about their housing rights and the law.

Assessment of Fair Housing

The geographic coverage for this plan is the city limits of the City of New Braunfels. New Braunfels

is located in Comal and Guadalupe Counties between Austin and San Antonio along IH-35. New Braunfels has an official 2010 decennial census population of 57,740. The 1-year estimate from the Census Bureau's American Community Survey (ACS) sets the 2015 population at 69,923.

The tables below show various demographic characteristics applicable to analyses of discrimination and fair housing. Due to the delay in the release of some 2011-2015 data, the 2010-2014 American Community Survey (ACS) estimates have been used. The tables below detail the population by race and ethnicity and general population and housing characteristics in New Braunfels.

Table 3 – 2010 and 2015 Race/Ethnicity of New Braunfels Population

Race/Ethnicity	2010 Population	Percent	2015 Population	Percent
Total	57,740	100%	69,923	100%
Non-Hispanic White	35,132	60.8%	41,583	59.5%
African American	1,081	1.9%	2,657	3.8%
American Indian/Alaskan Native	385	0.7%	202	0.3%
Asian	595	1.0%	1,021	1.5%
Hispanic	20,230	35.0%	22,522	32.2%
Other and Multi-race	317	0.6%	1,938	2.8%

Table 4 -- General Population and Housing Characteristics

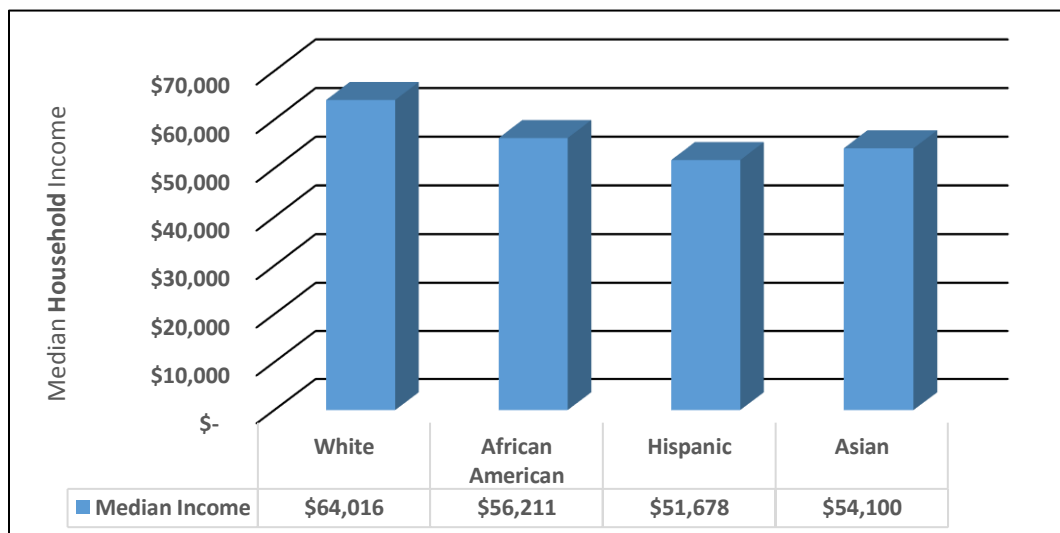
Characteristic	Count	Characteristic	Count
Elderly (65+)	8,040	Total Housing Units	23,752
Disabled	7,237	Vacant Units	1,935
Working Age Disabled	3,724	Households	21,827
Elderly Disabled	2,881	Owner-occupied Households	14,209
Veteran	5,034	Renter-occupied Households	7,618
Persons Below Poverty	6,932	Households with Children < 18	7,884
LEP Households	3,426	Median Household Income	
Unmarried Same Sex Partners	87	Median Monthly Owner Costs w/ Mortgage	\$1,397
Unmarried Opposite Sex Partners	1,135	Median Monthly Owner Costs w/o Mortgage	\$455
Population >= 25 yrs. w/ no HS diploma	4,795	Median Gross Rent	\$988
Foreign Born	4,363	Owner-occupied w/ Cost Burden > 30%	2,627
Non-citizens	2,932	Renter-occupied w/ Cost Burden	3,500

		> 30%	
Living in Group Quarters	995	Overcrowding (> 1 Person Per Room)	829

Racial/Ethnic Income Equality

While low-income households are not, in and of themselves, a protected class, there is often racial and ethnic inequality regarding income, which limits fair housing choice. The graphs below show the median household income by race/ethnicity and the percent of each race/ethnicity's households that fall within each income range.

Figure 1 – Median Household Income by Race/Ethnicity (2011-2015 ACS)



R/ECAP

HUD has determined racially or ethnically-concentrated areas of poverty (R/ECAPs) at the whole census tract level. For a census tract to be considered a R/ECAP it must have a non-white population of 50% or more and have 40% or more of individuals living below the poverty line or is three or more times the average census tract-level poverty rate for the metropolitan area, whichever is lower. Using the 2010 decennial census and the 2006-2010 American Community Survey (ACS), HUD has determined that there are no R/ECAP areas inside the city limits.

Diversity, Segregation and Integration

There are many methods for calculating and displaying levels of diversity, segregation and integration in a community. One of the ways to show segregation, particularly trends of segregation, is by the use of a dissimilarity index. The dissimilarity index represents the extent to which the distribution of any two groups, such as racial or ethnic groups, differ across subareas of a community. HUD has provided tables detailing dissimilarity between non-Hispanic whites and minorities for 1990, 2000 and 2010.

Table 5 – Dissimilarity Indices for New Braunfels and the San Antonio-New Braunfels CBSA (2017 release of AFFH from 2010 Census)

	New Braunfels, TX CDBG Jurisdiction				San Antonio-New Braunfels, TX CBSA Region			
Racial/Ethnic Dissimilarity Index	1990	2000	2010	2015	1990	2000	2010	2015
Non-White/White	31.73	25.69	22.12	29.53	48.90	46.39	43.46	45.51
Black/White	34.30	24.69	24.74	23.77	56.18	51.91	47.74	52.08
Hispanic/White	33.35	27.53	24.52	30.92	52.01	49.64	46.08	47.49
Asian or Pacific Islander/White	31.09	14.05	22.36	27.95	34.22	34.26	36.20	41.28

Based on the methodology and data reported by HUD, New Braunfels has low segregation values, especially compared with the region as a whole. The HUD dissimilarity index ranges from 0 to 100, with a value of 0 representing perfect integration between racial groups, and a value of 100 representing total segregation between racial groups. An index of less than 40 shows low segregation/high integration. Scores of 40-54 indicate moderate segregation and scores above 54 show low integration/high segregation. All of New Braunfels' scores are below 40, with the 2010 figures well below 40 in the 22 to 25 range.

Housing in New Braunfels

The housing stock in New Braunfels is relatively new, with more than one-third having been built since 2000. Housing in New Braunfels is predominately single family, with 72.7% of the 24,609 units being single family detached and 1.9% being single family attached. Another 5.6% are mobile homes, primarily in 6 mobile home parks. There are few apartment complexes and no condominiums with more than 19 units per complex.

Figure 2 – Housing Stock by Year Built (2011-2015 ACS)

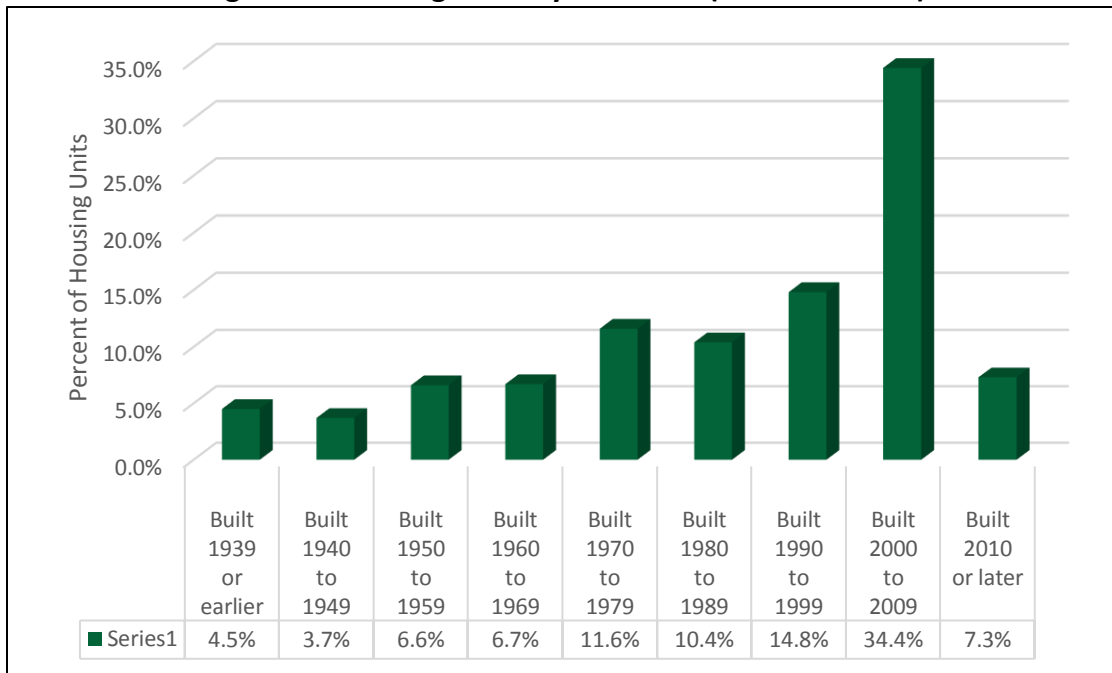
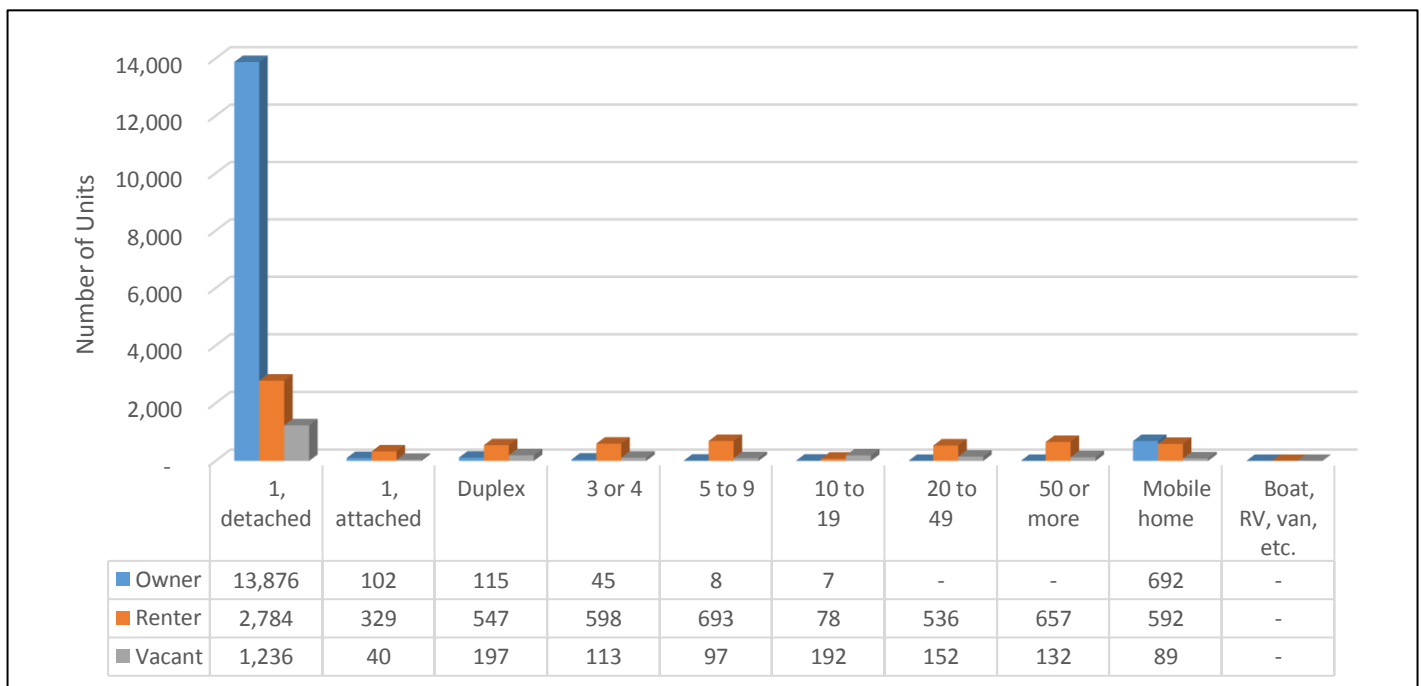


Figure 3 – Units in Structure by Tenure (2011-2015 ACS)



Only 22.4% of the occupied dwellings are single person households, with nearly half (10% of the total households) of the residents being 65 years or older. The majority of the occupied units

(60.7%) have no children under the age of 18 in residence. While the median number of total rooms per dwelling is only 5.5, there is relatively little overcrowding due to the small household size. Only 3.1% of the units have more than 1 person per room. The figures below show the distribution of housing units by the number of rooms and bedrooms and the number of occupied units by number of occupants.

Disproportionate Housing Needs

HUD's AFFH program is aimed at assessing the degree to which the protected classes are disproportionately served, regardless of income. HUD's CDBG program is aimed at assisting low- to moderate-income residents, defined as those extremely low-income households with incomes of equal to or less than 30% of the area's median income; very low-income households with incomes of 30.01-50% of the area's median income; and low-income (also classified as moderate-income) households with incomes of 50.01-80% of the area's median income. As a result, many of the income-based tables are broken down by the 4 categories of extremely low-, very low-, low- or moderate-, and above 80% of median-income.

The table below, from the 2017 release of the AFFH Tools shows the homeownership versus rental rates by race/ethnicity for the city and the MSA. For all race/ethnicities given, the owners as a percent of each group's total households outweighs the renters for the city, but for the region, the African Americans and Native Americans have a greater proportion of renters than owners.

Table 6 – Household Tenure by Race/Ethnicity (2017 Release of AFFH-Tools from 2009-2013 ACS)

Homeownership and Rental Rates by Race/Ethnicity	(New Braunfels, TX CDBG) Jurisdiction				(San Antonio-New Braunfels, TX) Region			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	10,200	73.83%	5,095	67.26%	235,880	49.03%	92,035	33.03%
African American, Non-Hispanic	250	1.81%	195	2.57%	22,660	4.71%	28,370	10.18%
Hispanic	3,245	23.49%	2,220	29.31%	208,495	43.34%	145,820	52.33%
Asian or Pacific Islander, Non-Hispanic	20	0.14%	0	0.00%	8,279	1.72%	6,890	2.47%
Native American, Non-Hispanic	30	0.22%	0	0.00%	910	0.19%	1,004	0.36%
Other, Non-Hispanic	79	0.57%	55	0.73%	4,845	1.01%	4,550	1.63%
Total Household Units	13,815	-	7,575	-	481,075	-	278,680	-
Homeownership and Rental Rates by Total Households for Each Race/Ethnicity	(New Braunfels, TX CDBG) Jurisdiction				(San Antonio-New Braunfels, TX) Region			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	10,200	66.69%	5,095	33.31%	235,880	71.93%	92,035	28.07%
African American, Non-Hispanic	250	56.18%	195	43.82%	22,660	44.41%	28,370	55.59%
Hispanic	3,245	59.38%	2,220	40.62%	208,495	58.84%	145,820	41.16%
Asian or Pacific Islander, Non-Hispanic	20	100.00%	0	0.00%	8,279	54.58%	6,890	45.42%
Native American, Non-Hispanic	30	100.00%	0	0.00%	910	47.54%	1,004	52.46%
Other, Non-Hispanic	79	58.96%	55	41.04%	4,845	51.57%	4,550	48.43%
Total Household Units	13,815	64.59%	7,575	35.41%	481,075	63.32%	278,680	36.68%

Since the 1970 Decennial Census, the Census Bureau no longer asks residents about the general condition of their dwelling – sound, deteriorated, or dilapidated – but continues to ask questions that are used by HUD as proxies for housing condition – lacking some or all plumbing, lacking complete kitchen, overcrowding (more than 1 person per room), and housing cost greater than 30% of income. The table below details the number of households by race/ethnicity that have any one or more of these housing problems and having severe housing problems:

Table 7 – Housing Problems* & Severe Housing Problems
by Racial/Ethnic Groups (AFFH Tools from 2017 release of 2009-2013 ACS)**

	New Braunfels			SA-NB MSA
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	% with problems
Race/Ethnicity				
White	4,120	15,300	26.93%	25.41%
African American	154	444	34.68%	41.10%
Hispanic	2,320	5,464	42.46%	38.54%
Asian	20	20	100.00%	32.70%
Native American	4	28	14.29%	37.73%
Other	65	133	48.87%	36.66%
<i>Total</i>	<i>6,675</i>	<i>21,390</i>	<i>31.21%</i>	<i>32.90%</i>
Household Type & Size				
Family HHs with < 5 people	3,220	12,825	25.11%	26.21%
Family HHs with 5+ people	1,010	2,328	43.38%	46.45%
Non-family HHs	2,450	6,235	39.29%	39.89%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	% with severe problems
Race/Ethnicity				
White	1,600	15,300	10.46%	11.96%
African American	100	444	22.52%	21.32%
Hispanic	1,129	5,464	20.66%	22.03%
Asian	0	20	0.00%	17.14%
Native American	4	28	14.29%	22.91%
Other	0	133	0.00%	19.38%
<i>Total</i>	<i>2,830</i>	<i>21,390</i>	<i>13.23%</i>	<i>17.51%</i>

* The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, > 1 person per room, and a housing cost burden > 30%.

** The severe housing problems for this HUD-provided table are: incomplete kitchen facilities, incomplete plumbing facilities, > 1 person per room and a housing cost burden > 50%.

Housing Market

Rental Market: The Fair Market Rents for New Braunfels, as part of the San Antonio-New Braunfels Fair Market Rent Area, have increased between 10.6% and 22.6%, depending on the number of bedrooms, since 2015. In 2017 the fair market rents for a 2-bedroom unit is \$768. The average renter in New Braunfels must work overtime or have more than one wage earner in the household to afford a dwelling at fair market rents. Based on the information through Zillow, the majority of the rentals in New Braunfels are more than \$1,250 per month, regardless of the number of bedrooms. These are above the area fair market rents for 0-2 bedrooms and require households with the area median income to having wage earners totaling 72 hours a week of paid work.

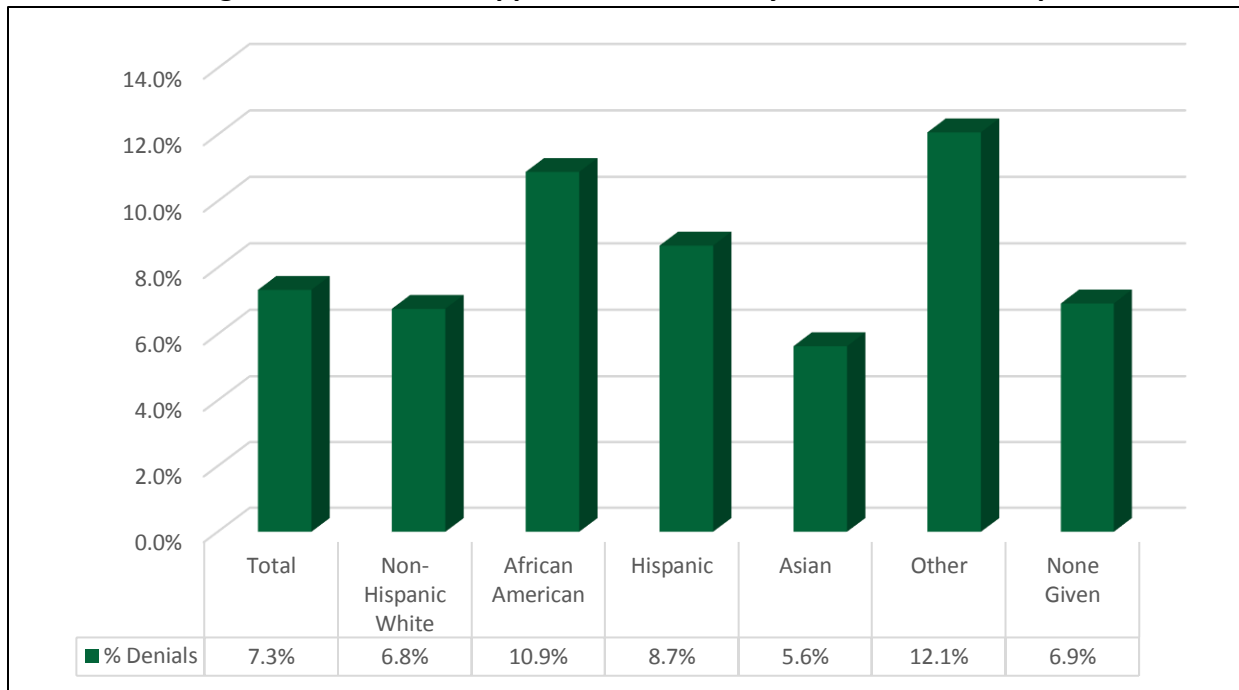
Owner Market: In February 2017, only 16 homes were on the market for sale at an asking price of \$150,000 or less. This is out of reach for households with incomes of less than the area median. The majority of the homes on the market had an asking price of more than \$300,000.

Home Mortgage Disclosure Act Data: The Home Mortgage Disclosure Act (HMDA) data provides information for every mortgage application by year, MSA, county and/or census tract. For the Fair Housing Plan, the 2015 census tract data for whole tracts at least partially within New Braunfels have been selected and analyzed. The census tract data have been aggregated to the represent totals for New Braunfels and the immediate surrounding area. Of the applications included, 96% were for single family dwellings (1-4 units) and 4% for manufactured housing. No applications were for condominiums or townhouses.

The database includes all residential applications regardless of the expected tenure (owner occupancy or for rental purposes) and regardless of completeness of applicant information. As a result, for analysis purposes, only the applications for owner occupancy have been selected and for most of the analyses, only the applications for which household income has been included have been selected. There were a total of 8,314 applications, with 7,634 being for owner occupancy and 6,222 of the owner occupancy applications having income information provided. Though the distribution of the reasons for the loans was consistent for all applications, just owner occupancy applications and those with incomes have been analyzed.

When comparing application denial rates within each racial/ethnic group, African Americans and Others (including multi-racial groups) have a significantly higher rate of denials than non-Hispanic Whites or the total applicant pool. Hispanics have a somewhat higher rate of denials than non-Hispanic Whites. The graph below shows a comparison of denials within each racial/ethnic group:

Figure 4 – Percent of Applications Denied by Racial/Ethnic Group



Across the board, debt-to-income ratio and credit history are by far the most prevalent main reasons for application denials. However, Asians have a higher than average rate of denials due to employment history, collateral and for “other” undefined reasons. Hispanics have a much higher rate of denials for unverifiable information and incomplete applications.

Access to Opportunity

Amenities, particularly private sector amenities such as grocery stores, pharmacies, medical offices, follow population growth. As a result, new subdivisions may be lacking in the amenities until the critical mass of people make them viable. At that time, the private sector not only follows the people, but often abandons the neighborhoods that are older with lower incomes. One aspect of fair housing choice is the ability to have amenities accessible. Older neighborhoods with lower incomes, lower housing costs, and higher rates of protected class households have only neighborhood “mom and pop” and convenience stores which must charge more for products due to the lack of purchase power. There are few private sector amenities within the areas of high minority concentration or low- to moderate-income concentration, creating a grocery and medical desert inside Loop 337. There are two fire stations within the low- to moderate-income areas but none within high minority concentration areas.

HUD has developed a table of Opportunity Indices to assist in analyzing fair housing in a jurisdiction. The tables below explain each index and New Braunfels scores.

Table 8 – Explanation of the Opportunity Indices and Scoring

Index	Interpretation of the scores
Low Poverty Index	<p>The higher the score, the less exposure to poverty in a neighborhood.</p> <p>The non-Hispanic whites have higher scores than other groups in New Braunfels, except for the Asians. All of the scores are lower for population below the poverty line, except for Asians, indicating that households in poverty live near other households in poverty, making their exposure to poverty higher than for the population as a whole. New Braunfels has higher scores than the region for all categories except Native Americans below the poverty line.</p>
School Proficiency Index	<p>The higher the score, the higher the school system quality is in a neighborhood.</p> <p>The scores for the population below the poverty line are slightly lower than for the total population in New Braunfels. Both categories are much higher than the region's scores.</p>
Labor Market Engagement Index	<p>The higher the score, the higher the labor force participation and human capital in the neighborhood.</p> <p>The scores are generally higher in New Braunfels than in the region across the board, in several groups, nearly 20 points higher.</p>
Transit Trips Index	<p>The higher the transit trips score, the better access to public transit and the more likely residents in the neighborhood utilize public transit.</p> <p>As with the transportation cost index, the transit trips index is much lower in New Braunfels than the region because of the much higher level of public transit in San Antonio.</p>
Low Transportation Cost Index	<p>The higher the score, the lower the cost of transportation in the neighborhood.</p> <p>The transportation cost index is much lower (costlier) than the region. This stands to reason, as San Antonio, the largest population base in the region has a high level transit system.</p>
Job Proximity Index	<p>The higher the score, the better the access to employment opportunities for residents in a neighborhood.</p> <p>The scores are relatively close across racial/ethnic lines, with the Hispanics having a slightly higher score than other groups. Among the population below poverty, Native Americans and Hispanics have higher scores than other groups. All of the scores for the total population are higher than for the region, and only African Americans below poverty are higher in the region than in New Braunfels.</p>
Environmental Health Index	<p>The index, based on air quality based on carcinogenic, respiratory, and neurological hazards, summarizes the potential exposure to harmful toxins at a neighborhood level. The higher the value, the better the environmental quality of the neighborhood.</p> <p>The region is higher than New Braunfels in every racial/ethnic category except for Asians below poverty. In some cases, the county fares better by nearly 20 points.</p>

Table 9 – Opportunity Indicators by Race/Ethnicity from HUD’s AFFH-T

(New Braunfels, TX CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	59.05	73.66	69.10	39.98	29.36	59.24	37.40
Black, Non-Hispanic	52.58	70.73	64.77	40.91	30.16	57.89	36.33
Hispanic	46.00	69.63	60.54	42.72	32.55	61.22	33.14
Asian or Pacific Islander, Non-Hispanic	63.00	74.62	68.46	38.82	27.70	53.70	37.25
Native American, Non-Hispanic	55.16	71.82	66.46	38.74	28.66	55.70	33.80
Population below federal poverty line							
White, Non-Hispanic	48.62	70.83	62.12	42.89	32.47	60.03	35.72
Black, Non-Hispanic	43.62	69.84	59.24	44.57	33.33	49.10	48.00
Hispanic	35.62	65.17	53.42	44.66	34.89	63.79	31.02
Asian or Pacific Islander, Non-Hispanic	74.86	74.26	78.41	44.02	25.49	50.54	40.15
Native American, Non-Hispanic	22.89	61.80	41.78	47.00	41.56	65.79	28.00
(San Antonio-New Braunfels, TX) Region							
Total Population							
White, Non-Hispanic	62.11	57.21	63.96	50.69	35.35	50.98	51.49
Black, Non-Hispanic	46.27	41.71	47.52	59.74	41.33	49.15	45.48
Hispanic	39.29	41.40	42.61	60.45	42.50	45.55	46.61
Asian or Pacific Islander, Non-Hispanic	64.58	56.95	68.09	60.02	42.82	52.99	45.98
Native American, Non-Hispanic	51.94	48.07	53.92	54.34	38.13	49.66	49.34
Population below federal poverty line							
White, Non-Hispanic	47.67	47.50	52.91	56.28	41.84	52.94	48.61
Black, Non-Hispanic	29.25	31.70	36.23	65.63	48.32	50.96	40.32
Hispanic	26.53	34.69	31.93	62.75	45.75	46.55	45.16
Asian or Pacific Islander, Non-Hispanic	52.33	47.64	58.06	66.15	51.59	58.41	38.06
Native American, Non-Hispanic	31.28	34.75	33.20	60.95	44.87	49.97	45.53

Legislative and Regulatory Assessment

The City of New Braunfels has a Fair Housing Ordinance that is found in Article II of Chapter 70 – Human Relations – of the City’s Municipal Code. Section 70-27 states the declaration of policy for the ordinance as:

It is hereby declared to be the policy of the city to bring about, through fair, orderly and lawful procedures, the opportunity for each person to obtain housing without regard to his race, color, creed, religion, national origin, sex, age or marital status, physical or mental handicap, or parenthood. It is further declared that this policy is grounded upon a recognition of the inalienable right of each individual to provide for himself and his family a dwelling according to his own choosing; and further, that the denial of such rights through considerations based upon race, color, creed, religion, national origin, sex, age or marital status, physical or mental handicap, or parenthood, constitutes an unjust denial or deprivation of such inalienable right which is within the power and the proper responsibility of government to prevent.

A review of the zoning, development, and building codes indicates that there is no undue regulatory burden placed on members of the protected classes, low-income, or providers of affordable housing. The City conforms to the 2015 International Building Code, 2015 International Residential Code, 2005 National Electrical Code, 2015 International Plumbing Code, and the 2015 International Mechanical Code.

Plan and Action Steps

The following table summarizes the planned action steps and timeline for affirmatively furthering fair housing in New Braunfels.

Table 10 – Summary Table of Action Steps and Timeline

Impediment		Total		Year 1		Year 2		Year 3		Year 4		Year 5	
	Action Step	P*	A**	P*	A**	P*	A**	P*	A**	P*	A**	P*	A**
1. Lack of financial independence & job opportunities													
	1a: Support social services providing financial assistance and economic opportunities	\$50K		\$10K		\$10K		\$10K		\$10K		\$10K	
2. Shortage of affordable housing													
	2a: Investigate ways to collaborate with the New Braunfels Housing Authority via an annual meeting	5		1		1		1		1		1	
	2b: Review all LIHTC applications	2		1		0		0		1		0	
	2c: Continue to fund non-profits to provide down payment and closing cost assistance	\$50K		\$10K		\$10K		\$10K		\$10K		\$10k	
	2d: Review development & zoning ordinances	1		0		1		0		0		0	
3. Shortage of affordable, safe rental units for disabled individuals													
	3a: Investigate all fair housing complaints filed by or on behalf of a disabled individual	3		0		1		1		1		0	
4. Need for homebuyer/homeownership classes to afford predatory lending													
	4a&b: Work with non-profits to provide classes	4		0		1		1		1		1	
5. Possible discrimination by landlords, realtors, lenders, HOAs													
	5a: City will continue to maintain a Fair Housing Officer to conduct activities and maintain a log of activities and complaints	25		5		5		5		5		5	

<i>6. Inability to maintain, repair owned homes or retrofit for accessibility</i>												
6a: City will continue to rehabilitate and retrofit owner occupied homes	40		10		10		10		5		5	
<i>7. Inadequate public infrastructure & facilities, primarily in LMA & minority areas</i>												
7a: Improve infrastructure and facilities Old Townsite & other LMAs	\$1M		\$200K		\$200K		\$200K		\$200K		\$200K	
<i>8. Lack of private amenities in older LMAs</i>												
8a: City will encourage and assist in mixed use developments and increased retail, entertainment, and support facilities	3		0		0		1		1		1	
<i>9. Code violations in LMI/minority neighborhoods</i>												
9a: City will continue to conduct code enforcement activities particularly in LMI and minority neighborhoods	200		40		40		40		40		40	
9b: City will demolish and clear at least 3 blighted properties in LMI and minority neighborhoods	3		0		0		1		1		1	
<i>10. Lack of awareness of fair housing rights</i>												
10a: City will include a fair housing education component in every CDBG public hearing	10		2		2		2		2		2	
10b: City staff will conduct at least 1 fair housing activity per year during Fair Housing Month	5		1		1		1		1		1	
10c: During the next 5 years the City will maintain on its official website a posting about the Fair Housing Ordinance and how to file a complaint	5		1		1		1		1		1	

* P = Planned Activities; ** = Accomplished Activities

INTRODUCTION INTO FAIR HOUSING AND FAIR HOUSING ACT

The U.S. Department of Housing and Urban Development (HUD) requires that all plans submitted for funding include a certification to affirmatively further fair housing. During the 5-year Consolidated Planning process, CDBG entitlement jurisdictions, such as New Braunfels, must undertake the development of a Fair Housing Plan (FHP) to be a framework for monitoring the activities to take place in affirmatively furthering fair housing. The jurisdictions are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for all persons and neighborhoods to receive the same level of services and amenities throughout the jurisdiction;
- Promote housing that is accessible to persons with disabilities; and
- Comply with all federal laws and requirements regarding fair housing a non-discrimination.

In order to develop a Fair Housing Plan, the jurisdiction must develop an Assessment of Fair Housing (AFH) that involves and addresses the housing and living environment concerns of the entire community.

This document includes the City of New Braunfels' Assessment of Fair Housing and the Fair Housing Plan and consists of the following:

5. Community involvement in developing the plan
6. Assessment of past goals and actions
7. Current assessment of fair housing
8. Fair housing priorities, goals, plan and action steps

History and Intent of the Fair Housing Act

On April 11, 1968, President Lyndon Johnson signed the Civil Rights Act of 1968, which was meant as a follow-up to the Civil Rights Act of 1964. The 1968 act expanded on previous acts and prohibited discrimination concerning the sale, rental, and financing of housing based on race, religion, national origin, sex, (and as amended) handicap and family status. Title VIII of the Act is also known as the Fair Housing Act (of 1968).

The power to appoint the first officials administering the Act fell upon President Johnson's successor, Richard Nixon. President Nixon tapped then Governor of Michigan, George Romney, for the post of Secretary of Housing and Urban Development. While serving as Governor,

Secretary Romney had successfully campaigned for ratification of a state constitutional provision that prohibited discrimination in housing. President Nixon also appointed Samuel Simmons as the first Assistant Secretary for Equal Housing Opportunity.

Affirmatively Furthering Fair Housing

In 1995, HUD released the Affirmatively Furthering Fair Housing (AFFH) regulation under Section 3608(e) of the Fair Housing Act and extends to all federal agencies that administer housing programs. For each year of funding, agencies must certify that they will affirmatively further fair housing choice. AFFH is more than being non-discriminatory, rather it is taking meaningful, positive actions to create diverse, inclusive communities with access to good jobs, schools, health care, transportation and housing by:

- Overcoming historic patterns of segregation by replacing segregated living patterns with integrated and balanced living patterns;
- Transforming racially and ethnically concentrated areas of poverty into areas of opportunity;
- Promoting fair housing choice;
- Fostering inclusive communities that are free from discrimination;
- Removing barriers that restrict access to opportunity; and
- Addressing significant disparities in housing needs and access to opportunities and amenities.

One way that HUD envisioned monitoring jurisdictions' success in affirmatively furthering fair housing choice has been through their development of an Analysis of Impediments (AI), coupled with steps to address the impediments. This document outlines public and private barriers to fair housing choice and how the jurisdiction aims to alleviate them. However, there was no requirement for HUD to review and approve the AIs; thus, there has been no way to monitor each jurisdiction's success in affirmatively furthering fair housing. During the past decade, civil rights and fair housing groups have been filing lawsuits around the country claiming, among other issues, defaults by jurisdictions on their signed certifications stating that they would affirmatively further fair housing.

In 2015, HUD finalized a new AFFH rule that replaces the Analysis of Impediments to Fair Housing Choice (AI) with a new format for assessing fair housing and developing a plan to address barriers and impediments. The new analytical format is the Assessment of Fair Housing (AFH) which flows into the goals and action plan to address the barriers and impediments outlined in the AFH. The new Fair Housing Plan with the AFH is now to be a process and plan that involves the jurisdiction and HUD. The 4 major parts of the process are:

Part	Description & Responsibility
1. Provision of Data and AFH Assessment Tool	HUD provides each jurisdiction or other program participants with data and an AFH assessment tool and provides technical assistance to aid program participants in submitting its AFH.
2. Analysis & Goals	Using the HUD data, local data and knowledge, other approved data, and the required community participation process program participants prepare and submit to HUD a complete AFH, including an assessment of patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to opportunity; and disproportionate housing needs.
3. Review & Response	HUD reviews each AFH within 60 days of receipt to determine if the program participant has met the requirements for its analysis, assessment and goal setting. HUD either accepts the AFH or provides written notification of its deficiencies and guidance on how the AFH should be revised in order to be accepted.
4. Incorporation into Planning Processes and Actions	The goals identified in the Fair Housing Plan with the AFH must be used to inform the strategies and actions of the Consolidated Plan, Annual Action Plan, Public Housing Authority Plan, and Capital Fund Plan.
Key:	HUD responsibility
	Program Participant responsibility

Until HUD releases the data and the final AFH assessment tool, jurisdictions are to continue to complete the Fair Housing Plan with the assessment/analysis as before, however the format may follow the proposed AFH format and include all of the data that will be required in the final assessment tool.

Protected Classes Under the Fair Housing Act and HUD Rules/Regulations

The Fair Housing Act prohibits housing discrimination based on race, color, national origin, religion, sex, disability and familial status (such as presence of children in the household). Though not specifically outlined as a “protected class” in the law, HUD regulations have expanded the definition to include HIV/AIDS under the disability protection; and lesbian, gay, bisexual or transgender (LGBT) persons under the familial status and sex protections.

Housing Choice for the Disabled and “Reasonable Accommodations”

The Act prohibits housing providers from discriminating against applicants or residents because of their disability or the disability of anyone associated with them and from treating persons with disabilities less favorably than others because of their disability. The Act’s protection covers not

only the home seekers with disabilities but also buyers and renters without disabilities who live with or are associated with individuals with disabilities who will also live in the home or frequent the home. Federal laws define a person with a disability as “Any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment.” A physical or mental impairment includes:

- hearing
- mobility
- visual impairments
- chronic or severe illness, such as cancer, heart disease, diabetes, multiple sclerosis
- HIV/AIDS or AIDS Related Complex
- chronic substance use disorder, other than current illegal use of a controlled substance
- chronic mental illness, such as PTSD, autism, epilepsy, bipolar, schizophrenia
- intellectual disabilities

The Act does not protect individuals with a disability whose residency would constitute a “direct threat” to the health or safety of other individuals or result in substantial physical damage to the property of others unless the threat can be eliminated or significantly reduced by reasonable accommodation. Individuals cannot be excluded based upon fear, speculation or stereotype about a particular disability or persons with disabilities in general. A determination that an individual poses a direct threat must be based on reliable objective evidence, such as current conduct or a recent history of overt acts. The determination must consider the nature, duration and severity of the risk of injury; the probability that injury will actually occur, and; whether there are any reasonable accommodations that will eliminate the direct threat.

If a person’s disability is obvious, or otherwise known to the provider, and if the need for the requested accommodation is also readily apparent or known, then the provider may not request any additional information. If the disability and/or the disability-related reason for the requested accommodation is not known or obvious, the requesting individual, medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability may also provide verification of a disability. In most cases, an individual's medical records or detailed information about the nature of a person's disability is not necessary for this inquiry.

In certain circumstances, the Act requires that housing providers allow residents to make reasonable structural modifications to units and public/common areas in a dwelling when those modifications may be necessary for a person with a disability to have full enjoyment of the dwelling.

Reasonable accommodations include a change, exception or adjustment to a rule, policy, practice or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including the public and common use spaces. Housing providers may not require persons with disabilities to pay extra fees or deposits as a condition of receiving a reasonable accommodation. Examples of such accommodations may include, but not be limited to:

- Providing an assigned accessible parking space close to the entrance of the dwelling unit;
- Providing an exception to the requirements to pay rent in person if it is impractical for the disabled tenant to go to the office or other location where rents are collected;
- Allowing service and assistance animals, including emotional support animals, whether specially trained/certified or not, even though the property has a “no pet” policy;
- Allowing the tenant to make reasonable structural modifications at his/her own expense, such as installing a ramp into the building/unit, lowering the entry threshold of the unit, installing grab bars in the bathroom(s); or
- Allowing live-in caregiver even though the property requires all unrelated residents to be on the lease or property title or when Section 8 Housing Choice Vouchers are used for rentals.

With certain limited exceptions, the Act applies to privately and publicly owned housing, including housing subsidized by the federal government or rented through the use of Section 8 Housing Choice Vouchers. Not only does the provisions apply to those involved in providing housing and residential lending, but the courts have also applied the Act to state and local governments in the context of exclusionary zoning or other land use decisions.

Under specific exceptions to the Act, the reasonable accommodation requirements do not apply to a private individual owner who sells his home so long as he does not own more than three single-family homes; does not use a real estate agent; does not employ any discriminatory advertising or notices; has not engaged in a similar sale of a home within a 24-month period; and is not in the business of selling or renting dwellings. The reasonable accommodation requirements of the Act do not apply to owner-occupied buildings that have four or fewer dwelling units. Additionally, a housing provider can deny a request for a reasonable accommodation if the request:

- Was not made by or on behalf of a person with a disability or if there is no disability-related need for the accommodation;
- Would impose an undue financial and administrative burden on the housing provider;
- Would fundamentally alter the nature of the provider’s operations; or
- When alternative accommodations are available that would address the requester’s disability-related needs.

Disparate Impact

A policy or action may be considered discriminatory if it has a disproportionate “adverse impact” against any protected class regardless of the intent of the policy or action. HUD’s Rule regarding the implementation of the Fair Housing Act’s Discriminatory Effects Standard (disparate impact) became final in 2013, and the Supreme Court upheld it in 2015. The rule and the court decision establish a consistent standard for assessing practices that on their face value or intent are neutral but the results are in violation of the Fair Housing Act. The HUD rule defines a practice with a discriminatory effect as one that actually or predictably results in a disparate impact on a group of persons within the definition of protected class; or has the effect of creating, perpetuating, increasing or reinforcing segregated housing patterns based on protected class. The new rule solidifies the prohibition of actions that are not directly linked to the rights of the individual in securing housing, but of actions that are locational in nature and can exclude or segregate particular communities/groups in practice.

The landmark decision of the Supreme Court in 2015 was that the Texas Department of Housing and Community Affairs reinforced residential segregation by “consistently” approving affordable housing, such as Low Income Housing Tax Credit properties, in African American neighborhoods instead of fairly distributing that housing across all communities to promote integration. Other types of disparate impact are tied to environmental justice issues prohibiting the placement of certain negative infrastructures/facilities in close proximity to neighborhoods that are predominately minority, low-income or otherwise disadvantaged. Zoning and land use ordinances, as well as other housing restrictions, though not by intention, may unfairly exclude minorities or other protected classes, and thus would have a disparate impact and be illegal. Redlining is another form of disparate impact whereby lenders or insurers refuse to provide mortgages or insurance to otherwise qualified households based on the location of the property, usually in a high minority area.

Under the Court's ruling in the 2015 case, in order to prove a case of disparate impact housing discrimination, the following must occur:

- First, a plaintiff must make out a prima facie case, drawing an explicit, causal connection between a policy or practice and the disparate impact or statistical disparity. As Justice Kennedy wrote, "A disparate-impact claim relying on a statistical disparity must fail if the plaintiff cannot point to a defendant’s policy or policies causing that disparity." Justice Kennedy also noted that "policies are not contrary to the disparate-impact requirement unless they are artificial, arbitrary, and unnecessary barriers."
- Second, a defendant must have the opportunity to prove that the policy is necessary to achieve a valid interest. If a defendant can't not prove that, then a plaintiff's claim of disparate impact must prevail.

- Finally, if a defendant has shown that the policy is necessary to achieve a valid interest, the plaintiff must then show that there is “an available alternative . . . practice that has less disparate impact and serves the [entity’s] legitimate needs.” If a plaintiff cannot do so, then their disparate impact claim must fail.

Environmental Justice

Environmental Justice focuses on the fair and equitable distribution of environmental benefits and burdens regardless of the income or protected class status of the area residents. This means the distribution of quality amenities equally throughout all communities in a city, county or region as well as the prevention of an imbalance in the location of environmental hazards where protected classes and low-income live. Environmental discrimination can occur when a local government allows potentially hazardous or highly-pollutant land uses to move near an area where protected classes and low-income live. It can also occur when local governments allow public housing authorities, low-income housing tax credit properties, centers for the disabled and other land uses aimed to serve the protected classes and low income to build near existing unsafe land uses or away from community amenities. Nimbyism (Not in my backyard) has relegated new unsafe land uses to areas away from neighborhoods with a majority of residents with a political voice. The result is that the land uses have nowhere else to go but near areas where residents have little political clout – i.e. the low-income and protected classes. Conversely, NIMBYISM keeps new housing for low-income and protected classes out of middle-income white neighborhoods, leaving only areas near existing environmental hazards for new construction.

Attorney General Eric Holder stated in 2011 that “in 2005, a report based on EPA data showed that African Americans were almost 80 percent more likely than white Americans to live near hazardous industrial pollution sites. Today, poor families of color are more likely to have a landfill proposed in their community. Their neighborhoods are more likely to have polluted water and soil. Their children are more likely to breathe polluted air and suffer from asthma. In 2011, the burden of environmental degradation still fall disproportionately on low-income communities and communities of color – and most often, on their youngest residents: our children. This is unacceptable. And it is unconscionable. But through the aggressive enforcement of federal environmental laws in every community, I believe we can – and I know we must – change the status quo.”

Businesses exist to turn a profit and many businesses such as grocery stores, pharmacies, medical offices and big box stores locate near more affluent neighborhoods where profits are higher or in far suburban and exurban areas where land costs are lower, but where the stores are accessible to those with private transportation. As a result, many inner city neighborhoods where low-income and protected classes live are termed “grocery deserts” because of the lack of quality stores with equitable pricing.

Relationship between Fair Housing and Affordable Housing

The Fair Housing Act’s list of protected classes does not include low-income and the Analysis of Impediments (AI) determines the extent to which members of protected classes experience

discrimination regardless of their income. However, historically, members of the protected classes have lower incomes and in that case housing affordable to low-income members becomes a fair housing issue. As a result, it is vital that the relationship between protected classes and income be explored as part of the AI. Public policies that contribute to the lack of affordable housing or that relegate affordable housing to areas of the community with limited amenities, near undesirable land uses or with high concentrations of low-income or minority households do affect equity for the protected classes. Currently, HUD is concerned about both minority concentrations and low-income concentrations, particularly as they overlap in communities.

Discriminatory Actions

The Fair Housing Act prohibits the following:

In the Sale and Rental of Housing:

No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting) or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

In Mortgage Lending:

No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap (disability):

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan or
- Set different terms or conditions for purchasing a loan.

In Addition: No one may:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

Additional Protection for those with a disability:

A landlord may not:

- Refuse to let a disabled tenant make reasonable modifications to his/her dwelling or common use areas, at the tenant's expense, if necessary for the disabled person to use the housing. (Where reasonable, the landlord may permit changes only if the tenant agrees to restore the property to its original condition when you move.)
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing.
- Example: A building with a "no pets" policy must allow a visually impaired tenant to keep a guide dog.
- Example: An apartment complex that offers tenants ample, unassigned parking must honor a request from a mobility-impaired tenant for a reserved space near her apartment if necessary to assure that she can have access to her apartment.

This protection applies for someone who:

- Has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities
- Has a record of such a disability or
- Is regarded as having such a disability

However, housing need not be made available to a person who is a direct threat to the health or safety of others or who currently uses illegal drugs.

Requirements for New Buildings:

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

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

- Reinforced bathroom walls to allow later installation of grab bars and
- Kitchens and bathrooms that can be used by people in wheelchairs.

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

In addition to the Fair Housing Act as it relates to the disabled, the Americans with Disabilities Act (ADA) requires that housing financed in any part through federal, state or local programs comply with ADA accessibility guidelines. The Uniform Federal Accessibility Standards (UFAS) requires that that federally-funded facilities be accessible by people with motor and/or sensory disabilities to the extent required by the Architecture Barriers Act. Some single-family housing that is built or rehabilitated with federal funds are required to meet visitability standards with at least one no-step entrance; doors and hallways wide enough to navigate a wheelchair through; and, a bathroom on the first floor big enough to get into in a wheelchair and close the door.

None of these requirements for new or rehabilitated buildings replace any more stringent standards in State or local law.

Housing Opportunities for Families:

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under 18 live with:

- A parent
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under 18.

Exemption: Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a Federal, State or local government program or
- It is occupied solely by persons who are 62 or older or
- It houses at least one person who is 55 or older in at least 80 percent of the occupied units, and adheres to a policy that demonstrates an intent to house persons who are 55 or older.

A transition period permits residents on or before September 13, 1988, to continue living in the housing, regardless of their age, without interfering with the exemption.

Housing Protection for Gay, Lesbian, Bisexual and Transgender:

The Fair Housing Act does not specifically include sexual orientation and gender identity as prohibited bases. However, a lesbian, gay, bisexual, or transgender (LGBT) person's experience with sexual orientation or gender identity housing discrimination may still be covered by the Fair Housing Act.

For Example:

- ♦ A gay man is evicted because his landlord believes he will infect other tenants with HIV/AIDS. That situation may constitute illegal disability discrimination under the Fair Housing Act because the man is perceived to have a disability, HIV/AIDS.
- ♦ A property manager asks a transgender male if he is "a boy or a girl" and then denies him an apartment because he appears to be a woman but has other physical expressions that are stereotypically male. Because the landlord denied the prospective tenant housing because of non-conformity with gender stereotypes, that situation may constitute illegal sex discrimination under the Fair Housing Act.

During 2008, HUD began charging landlords with same-sex sexual harassment.

HUD investigates complaints of housing discrimination based on race, color, religion, national origin, sex, disability, or familial status at no cost to the complainant. HUD will investigate the complaint and try to conciliate the matter with both parties.

If conciliation fails, HUD will determine whether "reasonable cause" exists to believe that a discriminatory housing practice has taken place. If HUD finds "no reasonable cause," we will dismiss the complaint.

If HUD finds reasonable cause, HUD will issue a charge of discrimination and schedule a hearing before a HUD administrative law judge (ALJ). Either party may elect to proceed in federal court. In that case, the Department of Justice will pursue the case on behalf of the complainant. The decisions of the ALJ and the federal district court are subject to review by the U.S. Court of Appeals.

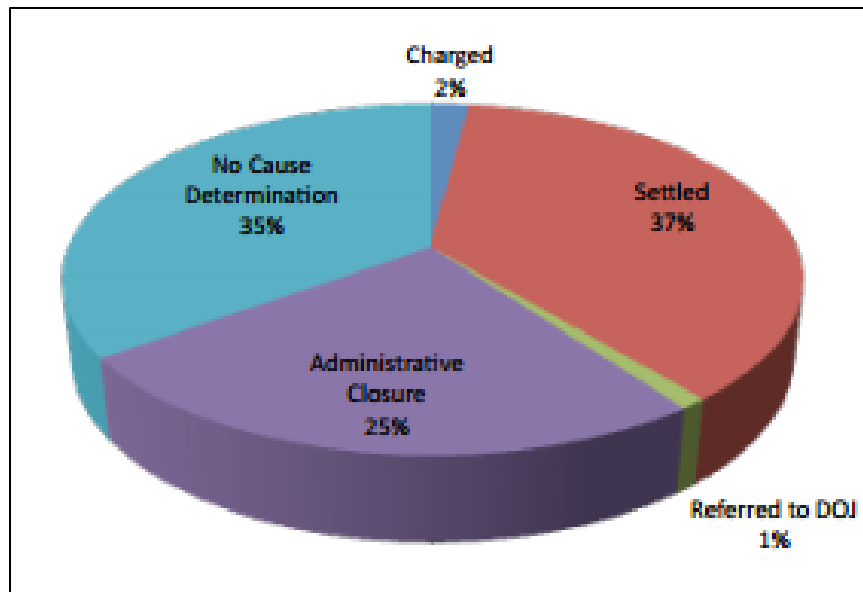
A copy of the current Housing Discrimination Complaint Form is included in the appendix of this document and can be downloaded from the HUD website at:

<http://www.hud.gov/complaints/housediscrim.cfm>.

The *FY 2012-2013 Annual Report on Fair Housing* by the Fair Housing Equal Opportunity office of HUD, states that only 1% of complaints were referred to the Department of Justice, down from 3% in 2008. The graph below, extracted from the annual report, shows the disposition of the cases nation-wide.

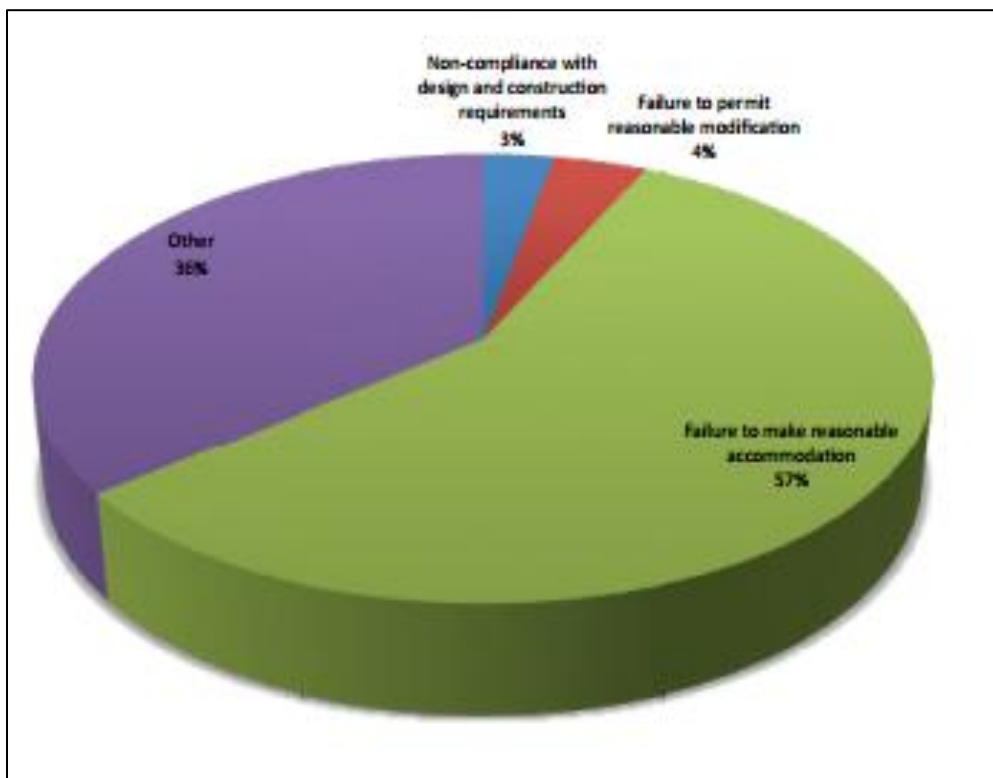
The FHEO office of HUD also filed 36 HUD Secretary-initiated complaints in FY 2012-2013 and charged or reached settlements in 27.

Figure 5 – 2013 U.S. Fair Housing Cases by Case Disposition



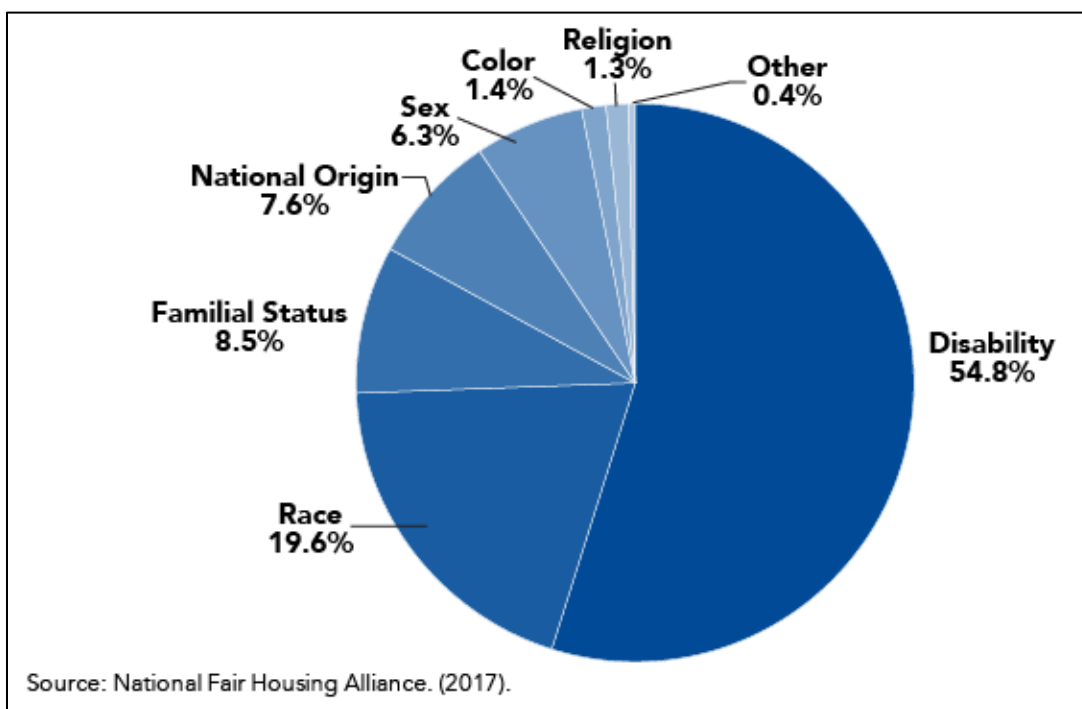
Disability discrimination is the largest category of complaints that HUD receives each year. Below is a graph extracted from the HUD 2012-2013 Annual Report on Fair Housing:

Figure 6 – Reasons for U.S. Fair Housing Complaints Based on Disability



The graph below from the National Fair Housing Alliance shows the national housing discrimination complaints in 2016 by protected class. More than half of the complaints were for discriminatory actions against the disabled, with more than one-fourth for race/national origin/color.

Figure 7 – 2016 National Housing Discrimination Complaints



Texas Fair Housing Act

The Texas Fair Housing Act is codified in Chapter 301 of the Texas Property Code and prohibits housing discrimination as set forth in the federal Fair Housing Act. For the most part, the Texas Fair Housing Act follows the federal Fair Housing Act closely. However, Section 301.003(6) deviates in its definition of disability:

(6) "Disability" means a mental or physical impairment that substantially limits at least one major life activity, a record of the impairment, or being regarded as having the impairment. The term does not include current illegal use or addiction to any drug or illegal or federally controlled substance and does not apply to an individual because of an individual's sexual orientation or because that individual is a transvestite.

The federal Americans with Disabilities Act and Fair Housing Act do state that persons currently with or recovering from substance abuse disorders are considered to have a disability. The

national laws have not specifically prohibited discrimination based on sexual orientation or gender identity, but HUD's more recent clarification of the Fair Housing Act does include lesbian, gay, bisexual and transgender (LGBT) individuals as part of the protected classes. At this time, Texas has not modified its Fair Housing Act to comply with the current federal definitions of protected classes and discrimination.

The Texas Workforce Commission is the state agency responsible for enforcing the Texas Fair Housing Act, through the Texas Department of Housing and Community Affairs monitors fair housing compliance in the rental properties throughout the state that it has supported with federal funds.

Local Compliance and Ordinances

Municipalities must ensure that their ordinances, policies and procedures are not only non-discriminatory, but also affirmatively further fair housing choice to the greatest extent possible. Municipalities receiving HUD funding must have a Fair Housing Officer assigned and are encouraged to have a local fair housing ordinance. The Fair Housing Officer should be charged with enforcing the local fair housing ordinance and assisting residents in filing fair housing complaints with HUD.

The City of New Braunfels has a fair housing ordinance to complement the Fair Housing Act and Texas Fair Housing Act. Discussion of the local ordinance can be found below in the Assessment of Fair Housing chapter. In addition, Lone Star Legal Aid provides free legal assistance to those wanting to file a complaint of fair housing violations in the Comal and Guadalupe areas. Texas Appleseed and the Fair Housing Council of Greater San Antonio advocate for those facing discrimination for underrepresented Texans through promoting social and economic justice. Disability Rights Texas and Advocacy, Inc. provides pro bono legal assistance in disability related discrimination cases throughout Texas.

COMMUNITY INVOLVEMENT

Under the new Affirmatively Furthering Fair Housing (AFFH) rule, HUD requires that the public is involved in the development of the Fair Housing Plan and must comply with the City's Citizen Participation Plan. The City of New Braunfels has routinely encouraged participation by all residents, particularly persons of low- to moderate-income and members of a Fair Housing protected class. During the PY 2015-2019 Consolidated Planning process, the City of New Braunfels conducted a number of activities to involve residents in the development of both the Consolidated Plan and Fair Housing Plan. During the actual post-Consolidated Plan development of the Fair Housing Plan, New Braunfels has held a stakeholder meeting to discuss fair housing and affordable housing issues. Subrecipients are educated on fair housing issues and law. The City issues a Fair Housing Month proclamation each April. The City has a Fair Housing Officer that can assist with complaints and provide information to residents.

Survey

The City provided a survey in English and Spanish for residents and other interested parties to complete. The survey included questions about the community and housing needs in New Braunfels as well as incidences and perceptions of housing discrimination. The surveys were available on-line as well as paper copies available at City Hall, the public library and community service agencies. Public notices for the surveys included links to on-line access and physical locations for acquiring paper copies. Copies of the survey are included in the attachments. No one completed the Spanish on-line survey or either paper surveys. The demographics of the respondents are below:

- Race/Ethnicity
 - White Hispanic = 16%
 - Native American Hispanic = 1.3%
 - Other and Multi-racial Hispanic = 6.7%
 - Non-Hispanic White = 74%
 - Non-Hispanic Other and Multi-racial = 2%
 - African American = 0%
 - Asian = 0%
- Age
 - 18-24 = 1.3%
 - 25-34 = 20%
 - 35-49 = 29.3%
 - 50-64 = 36%
 - 65 and older = 10.7%

- No answer = 2.6%

Table 11 – Results of Public Survey

Have you or others you know:	Yes	No	DK/NA
Experienced inability to rent or purchase a home due to race or ethnicity	4	52	19
Experienced inability to rent or purchase a home due to national origin or perceived national origin	2	53	20
Experienced inability to rent or purchase a home due to a physical or mental disability	2	53	20
Experienced landlords refusing to make reasonable exterior accommodations for a tenant with a physical or mental disability	4	51	20
Experienced landlords refusing to allow disabled tenant to make reasonable interior accommodations/alterations	3	52	20
Experienced landlords refusing to allow service or assistance animals for disabled tenants	3	49	23
Experienced inability to rent or purchase a home due to being over 60 years of age	3	51	21
Experienced inability to rent or purchase a home to do household structure (unmarried partners, presence of children, single parents, pregnancy)	3	51	21
Experienced refusal to be shown a home or acquire a mortgage to purchase in a predominately minority neighborhood	2	52	21
Experienced refusal to be shown a home or acquire a mortgage to purchase in a predominately white neighborhood	2	52	21
Experienced inability to get homeowner's insurance for housing in a predominately low-income or minority neighborhood	1	54	20
Refusal of landlord to accept Section 8 Housing Choice Vouchers	8	47	20
Experienced lower quality schools in low-income or minority attendance zones	8	47	20
Experienced a lack of or lower quality/aged infrastructure, public transportation and other public amenities in low-income or minority neighborhoods	16	39	20
Experienced a lack of private-sector amenities (grocery stores, drug stores for example) in low-income or minority neighborhoods	13	40	22
Experienced discrimination based on location and/or protected class status when complaining about public infrastructure or safety issues	7	48	20
Experienced slower response times for police, fire, EMS in low-income or minority neighborhoods	3	51	21
Experienced discriminatory actions or verbiage by public servants, including City workers, police, fire personnel, EMTs, and/or elected officials	3	50	22
Experienced hate crime(s) within or surrounding schools	4	50	21
Experienced hate crime(s) within certain neighborhoods	3	50	22
Are there areas in New Braunfels with:			
High concentrations of low income or protected classes that don't have the same public facilities or infrastructure as the rest of the community?	11	18	46

Are there areas in New Braunfels with high concentrations of low income or protected classes that don't have the same police, fire and/or EMS protection as the rest of the community?	2	24	49
Are there negative facilities or infrastructures (landfills, toxic waste dumps, sewer treatment plants, prisons, dangerous/unhealthy industries, etc.) located in or adjacent to neighborhoods with concentrations of low income or protected classes?	8	23	44

Explanations for “yes” answers:

- School in Rebecca Creek Canyon Lake is very racist
- Poor area always have bad schools, bad amenities, and are typically disregarded
- NBISD zoning makes Carl Shurz an undesirable school.
- We go to private school because of poor quality of an NBISD education
- Several residents on Academy have complained to the city about speeding traffic only to be told that adding stop signs/speed bumps would redirect traffic out of the neighborhood (Makes no sense)
- It seems until several years ago there were no fast food or grocery type stores being built on the west side of town
- The part of New Braunfels that has the most low income housing, on the west side, is an old part of town that needs investment in infrastructure. The lack of investment, however, is true of all old parts of town, including where the residents have high incomes.
- I was denied housing because of my low credit rating; what low-income parent has a good credit rating?
- Probate Court Judge Randy Gray did not allow due process of the law for my elderly mother who did not want a guardianship. *[page of explanation followed]* My mother did not deserve to suffer and die the way she did because of the manner and rulings of this judge.
- What public transportation? Does New Braunfels have it?
- My apartment complex does not accept Section 8 or any type of assistance for senior citizens on limited income. Only one place in New Braunfels does offer lower rent for people on limited income and the waiting list is huge. I am going to have to move to San Marcos when my lease is up because I can no longer afford to live in New Braunfels.
- Discriminated against having adult children live with me – they are my caregivers, but it didn’t matter.
- While purchasing a home my real estate agent refused to show me a home in a predominantly Hispanic neighborhood. I am white. I got a new real estate agent and purchased the home. Very happy, 3 years later and I am still the only white person in the area.

- There are stone quarries in west end and further south.
- There are negative land uses in Hunters Creek, Oak Run, The Hill, and Crestside.
- The case about elderly residents forced to move from the only housing they could afford and left with no place to go. This involved the trailer park near Bucee's several months ago. These low income seniors are at a terrible disadvantage in our community.
- Solms Rd. doesn't have access to stores.
- The city jail is near a neighborhood.
- Housing that backs up too close to the railroad and dry branch of the Comal Creek, which is subject to flooding with heavy rains. This is on both sides of Live Oak Street, crossing the railroad and creek bed.
- There is housing near a cement plant.
- Landa Place, Bavarian Apt. – too far to walk for groceries, medications, etc.

Additional Open-ended Responses:

- What do you think the City's role should be in encouraging and furthering fair housing choice and housing equality in New Braunfels?
 - A priority as developments and housing permits are considered and approved; changes in density requirements; fee waivers for affordable housing builders; donation of land for affordable housing (off unpaid tax file).
 - Provide down-payment and/or closing cost to low income families.
 - Encourage more affordable housing/apts. for low income residents. Offer tax incentives or do something – costs are too high.
 - All you can do is zone. Private property rights allow for landowners to develop as they please.
 - Privatized incentives for housing to match income.
 - I don't believe the city should have any involvement or influence in the real estate market in our area.
 - Be fair.
 - Provide more opportunities for affordable senior housing for all New Braunfels senior citizens.
 - Nothing. It is a free market. The demand for housing will set the prices. There are other cities to live in if a person feels the cost is too high here.
 - Keep the Federal Government out of city issues.
 - Encourage affordable housing being available but to keep them clean and neat and up to code at all times.
 - The City should change its zoning regulations to allow for smaller residential lots.
 - Please do not go on the credit rating. If I do not make enough money to charge I will not have a credit rating.

- More education courses about finance and home ownership not affiliated with a realtor.
- Encourage more affordable housing. So many even middle-class citizens are priced out of our area. As a homeowner, I appreciate rising home values. However, I experienced the pain of finding a suitable home for a reasonable price as a first-time home buyer. And I was lucky enough to live in a two-income household with no kids at the time.
- Making sure that the housing are not too high density. They should keep the density at a level that would accommodate the new residents and existing residents in the neighborhood.
- City should not participate and if mandated, it should be at the minimum level.
- I don't think it should be encouraged at all. The whole town has gone drastically downhill just in the past 4 years. Crime has increased, sex trafficking and drugs all over. It's becoming a crime ridden hell hole. Seems like there are an awful lot of pedophiles in NB. Why? Stop creating a predatory environment.
- If this is not already being done, purchase and upgrade older houses in New Braunfels to be mixed among other neighborhoods to be leased by low to moderate income families to avoid the stigma that comes with living in subsidized housing.
- What do you think the City's role should be in discouraging discrimination by individuals, organizations, businesses, and public officials in New Braunfels?
 - Make more single family homes available that are affordable to less wealthy individuals – or condos/apartments that can encourage home ownership.
 - I'm not aware of the possibilities, other than public recognition for the good guys.
 - Require builders to provide a percentage of projects for low income families in quality housing.
 - Encourage/support more affordable elderly housing.
 - I don't think there should be any of these homes in NB. They usually bring a lower class of people and high crime to the area.
 - Needs to be more modest but quality housing for seniors who are either fixed income or single supporting and limited income. The city is no longer resident-friendly to this population.
 - We don't want this!
 - The city should do whatever it can to encourage fair housing and protecting property taxes from skyrocketing in low income area.
 - I don't believe that the city should take a role – it is a federal issue or state, not city issue.
 - Think we are doing a good job. Council approved and we are getting low income housing.
 - I don't know but it will be hard with the cost of living here.

- Are there any other comments you have regarding discrimination or fair housing in New Braunfels?
 - We are a city of rental property that sits idle much of the year -- need to find innovative ways to engage builders, citizens, and tourists to provide housing for service sector workers that support our flourishing tourist economy.
 - There are not African Americans working at the city. Why?
 - I left the previous answer blank, as I appreciate the gesture of this survey this is just smoke and mirrors. This is just an action item for the city to mark a check box. The city already knows what it is and is not doing. The city already knows of the discrimination by the Police and EMS services in this city nothing will ever change. It never has and never will. It is a good ole boy society and if you are a new comer in this town you are screwed. New Braunfels wants the money of the growth but doesn't want the people that support the infrastructure. The police are DOWN RIGHT RUDE and CRUDE and think that they are GOD and no I'm not speaking from experience or any dealings with them. I'm speaking from seeing them treat others in this manner. Saw them Taser a gentleman right after he had just had a Grand Mal seizure. All because he would not sit down and let them take him to the hospital when the man said he didn't want to go several times. WOW. Police are crazy in this city.
 - There are plenty of affordable housing already in the neighboring counties. People should chose to live in a place that they can afford, not force change. I'd love to live in a house on the lake but I can't afford it so I don't. New Braunfels is a gem! Great German culture, nice upper middle class town. That's what attracts the citizens you want to live and spend their money in your town. Please PLEASE keep this in mind
 - I think New Braunfels needs to develop affordable housing areas, and public transportation specifically for the economically challenged.
 - Florida and Arizona seem to provide the most affordable housing for their senior citizens. My husband and I, now in our seventies, have wondered for years why Texas has neglected to provide affordable opportunities for senior housing. The senior housing that we have found, like the Pinnacle for example, is unaffordable for people of modest means. Developers are out to make big bucks which leaves a certain segment of the population out in the cold. This not only applies to seniors but for others as well. Best of luck in your endeavors and I hope this survey will provide you with enough information to improve conditions in our community for those who are less fortunate.
 - Keep the Federal Government out of city issues.
 - The City could build more sidewalks and bike lanes that facilitate transportation for low income residents. The City could also put more effort towards developing public transit.
 - Yes, I applied for HUD and was turned down because of a low credit rating.

- I've lived here 21 years and I have not seen any discrimination nor have my 4 kids that were raised here.
- Don't take the grant money. It's not worth it. The cost is too high.
- A short term voucher system on a sliding scale for rental properties, whether they be homes or apartments that are scattered in with moderately priced rentals to feel more part of the community instead of grouped together in subsidized complexes or slum like areas would also help them be encouraged to work harder and become educated while they are on a time frame to improve their work situation. More information provided about any mass transportation for these people to use to get to work from their homes. There is nothing more depressing and discouraging to lose one's job and find help is not easy to locate. Or to be with other's that are depressed and out of work and have lost hope. Work training and/or classes to improve skills and work interests without being singled out as being destitute or impoverished. Those with disabilities need dependable and safe helpers they can trust to treat them with respect and encouragement. Those with new disabilities could benefit from training or classed to "restart" or "recover" from their news lives of being destitute and that there is hope in this community. The majority of jobs available in New Braunfels are minimum wage jobs and tend to be seasonal and dependent on the tourist trade. New Braunfels needs to give incentive to larger companies with room for advancement to move to New Braunfels and create more stable jobs. For the second fastest growing city in the United States, too many people are commuting to Austin or San Antonio to work. We need our citizens to work and live in New Braunfels.
- See my responses above. We are growing very fast. I don't want to discourage people moving here but let's make sure we don't turn our city into a high crime city with several shootings like Chicago.
- If I am paying for this, rubbish, shame on the city. Same goes for the land study on city owned land! Wasteful when we have city streets in disrepair! Sick of you allowing small homes to be moved and parking going in.
- I think NB has a fair market housing, the issue is some people want a handout instead of working harder. While NB has had issues of discrimination in years past, I think that generation has died out and a more welcoming generation has replaced them.
- Every person deserves the opportunity to afford a place to live.

Public Meetings

In addition to the public hearings for the Consolidated Planning and Annual Planning processes, the City conducted a stakeholders meeting to discuss fair housing issues and laws.

Groups Consulted

The City of New Braunfels contacted a number of agencies, organizations and stakeholders in the development of both the Consolidated Plan and Fair Housing Plan. The following list includes those contacted and the results of the contacts:

Table 12 – Responses from Stakeholders

Agency	Topic & Responses
City of New Braunfels Fair Housing Officer	In the past year, the City has not received any fair housing complaints; discussed outreach and education efforts for the upcoming year
Comal County Senior Center	Needs of elderly in maintaining housing, finding affordable assisted living and limited number of senior only rental properties; agency has not heard any fair housing complaints from its members
San Antonio Food Bank	General discussion of issues for low-income residents
Connections	Housing issues for youth aging out of foster care and homeless youth; issues centered around not being able to rent without a co-signer due to their age; lack of credit and work history
CASA	Not aware of any fair housing issues for their clients and families; mentioned that larger units were hard to find and often prevented grandparents from being able to have the children in their home
Family Life Center	Works with those at risk of homeless due to lack of resources for rent and utilities; was not aware of any fair housing issues
Comal County Crisis Center	Discussed needs of victims of domestic violence and sexual assault; main issue is lack of funding for deposits and finding affordable units; some landlords do not want to rent to DV survivors because of fear of the abuser destroying their property
Comal County Habitat for Humanity	Discussed needs of low income homebuyers; occasionally encounters NIMBY when purchasing lots and constructing houses
McKenna Foundation	General discussion of housing needs; Foundation is not aware of any fair housing complaints
Family Promise	Housing needs of homeless families

Hill Country Community MHDD Center	Housing needs for people with disabilities; some discrimination against people with mental illness; for physically disabled, main issues are finding accessible units and landlords refusing to make accommodations or allow service animals
Hill Country Veterans Services	Discussed needs of veterans and their families
LULAC Council 4217 of New Braunfels	Discussed racial issues for the Latino community; no official complaints but did mention that larger families have a very difficult time finding rental units
NAACP San Antonio	Discussed racial issues in securing housing; has not received any complaints from New Braunfels residents
Fair Housing Council of San Antonio	No response
New Braunfels Housing Authority	Agency has not received any complaints; Voucher holders are able to find rental units but single family units are scarce or priced above the FMR
Community Council of South Central Texas	Discussed issues of poverty, affordable housing; agency's stated that the biggest issue is financial which is not a fair housing violation
Disability Rights Texas	Issues discussed were the lack of accessible housing; housing located near services and amenities; landlords not wanting to make reasonable accommodations

ASSESSMENT OF PAST GOALS AND ACTIONS

During the past years, the City of New Braunfels has engaged in a number of on-going activities to affirmatively further fair housing. Included in the actions are:

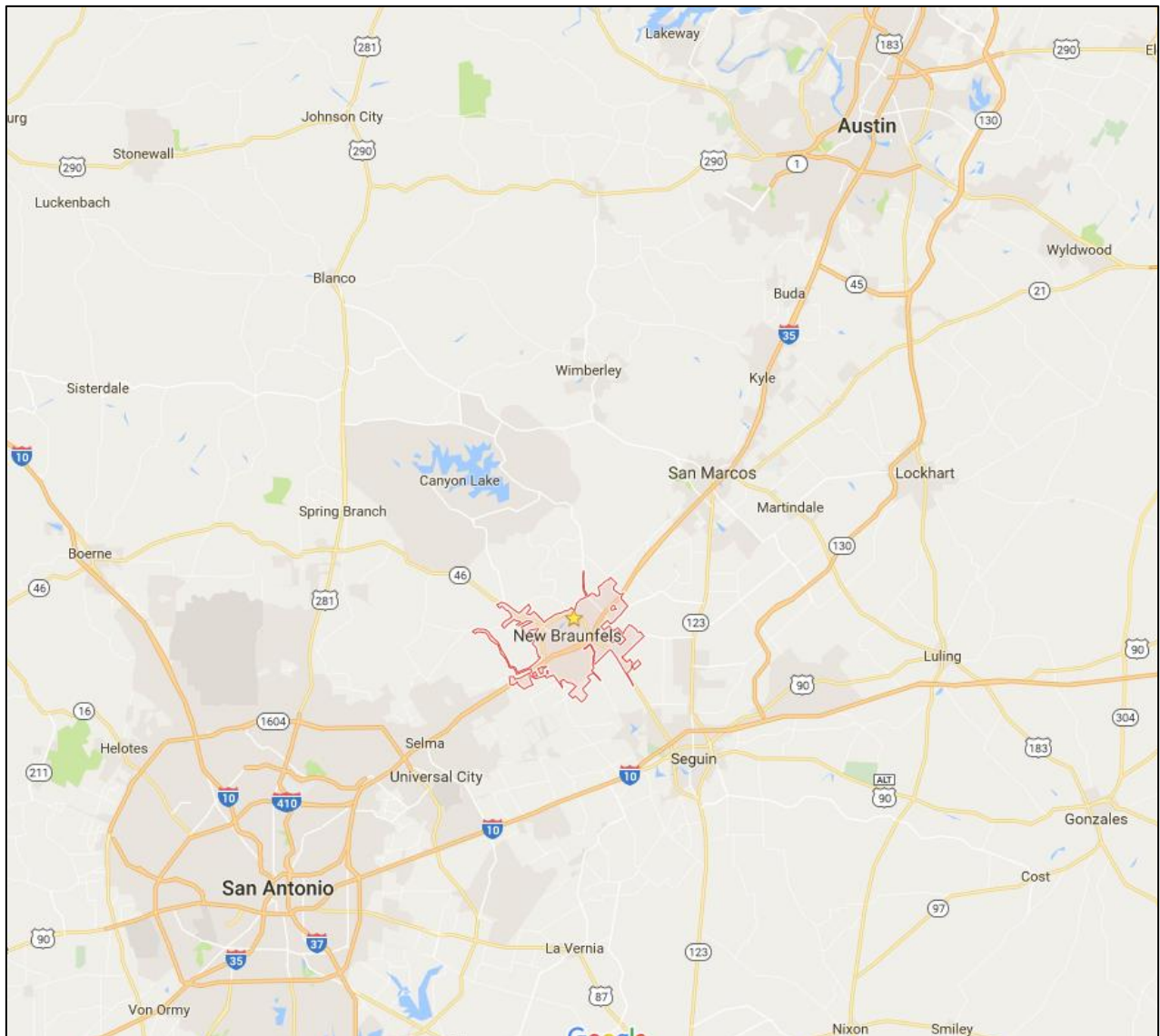
- The City established a Fair Housing Ordinance in line with the Federal Fair Housing Act and State of Texas Fair Housing Ordinance.
- As part of both the local ordinance and Federal requirements, the City has established a Fair Housing Officer charged with leading the activities to affirmatively further fair housing, develop the Fair Housing Plans, inform the public about fair housing, receive and investigate complaints, and assist complainants in submitting documentation to the proper authorities. The Fair Housing Officer maintains a log of all inquiries and complaints, with the issue, City's participation, and resolution.
- The City has provided Fair Housing posters to non-profit agencies for posting in their facilities.
- Within the CDBG program, the City has established a housing rehabilitation program aimed at elderly and/or disabled homeowners. This program affords the owners the opportunity to remain in their homes, their housing of choice, in a safe and healthy environment, as well as maintain the home's value and the value and integrity of the neighborhood.
- The housing rehabilitation program also provides accessibility modifications to ensure that the homes are ADA compliant and accessible to residents and visitors who have a physical disability.
- The City also provides funding for emergency rent/utility assistance to prevent homelessness.
- Down payment and closing cost assistance is provided with City CDBG funds through a non-profit subrecipient.
- The City funds a number of projects for agencies sheltering, serving, and accessing housing for the homeless.
- Each year, the City conducts public hearings for the CDBG program and Fair Housing is one of the topics discussed in order to better inform attendees about their housing rights and the law.

ASSESSMENT OF FAIR HOUSING

General Demographics

The geographic coverage for this plan is the city limits of the City of New Braunfels. New Braunfels is located in Comal and Guadalupe Counties between Austin and San Antonio along IH-35.

Map 1- Location of New Braunfels in Central Texas



New Braunfels has an official 2010 decennial census population of 57,740. The 1-year estimate from the Census Bureau's American Community Survey (ACS) sets the 2015 population at 69,923. The table below details the population by race and ethnicity:

Table 13 – 2010 and 2015 Race/Ethnicity of New Braunfels Population

Race/Ethnicity	2010 Population	Percent	2015 Population	Percent
Total	57,740	100%	69,923	100%
Non-Hispanic White	35,132	60.8%	41,583	59.5%
African American	1,081	1.9%	2,657	3.8%
American Indian/Alaskan Native	385	0.7%	202	0.3%
Asian	595	1.0%	1,021	1.5%
Hispanic	20,230	35.0%	22,522	32.2%
Other and Multi-race	317	0.6%	1,938	2.8%

The table, figure and maps below show various demographic characteristics applicable to analyses of discrimination and fair housing. Due to the delay in the release of some 2011-2015 data, the 2010-2014 American Community Survey (ACS) estimates have been used.

Table 14 -- General Population and Housing Characteristics

Characteristic	Count	Characteristic	Count
Elderly (65+)	8,040	Total Housing Units	23752
Disabled	7,237	Vacant Units	1935
Working Age Disabled	3,724	Households	21,827
Elderly Disabled	2,881	Owner-occupied Households	14,209
Veteran	5,034	Renter-occupied Households	7,618
Persons Below Poverty	6,932	Households with Children < 18	7,884
LEP Households	3,426	Median Household Income	
Unmarried Same Sex Partners	87	Median Monthly Owner Costs w/ Mortgage	\$1,397
Unmarried Opposite Sex Partners	1,135	Median Monthly Owner Costs w/o Mortgage	\$455
Population >= 25 yrs. w/ no HS diploma	4,795	Median Gross Rent	\$988
Foreign Born	4,363	Owner-occupied w/ Cost Burden > 30%	2,627
Non-citizens	2,932	Renter-occupied w/ Cost Burden > 30%	3,500
Living in Group Quarters	995	Overcrowding (> 1 Person Per Room)	829

Racial/Ethnic Income Equality

While low-income households are not, in and of themselves, a protected class, there is often racial and ethnic inequality regarding income, which limits fair housing choice. The graphs below show the median household income by race/ethnicity and the percent of each race/ethnicity's households that fall within each income range.

Figure 8 – Median Household Income by Race/Ethnicity (2011-2015 ACS)

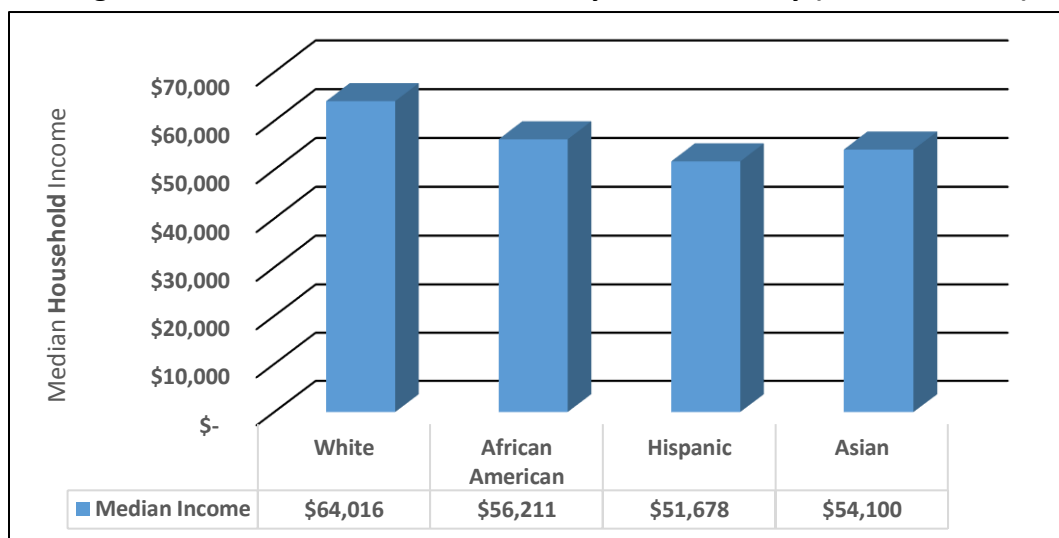
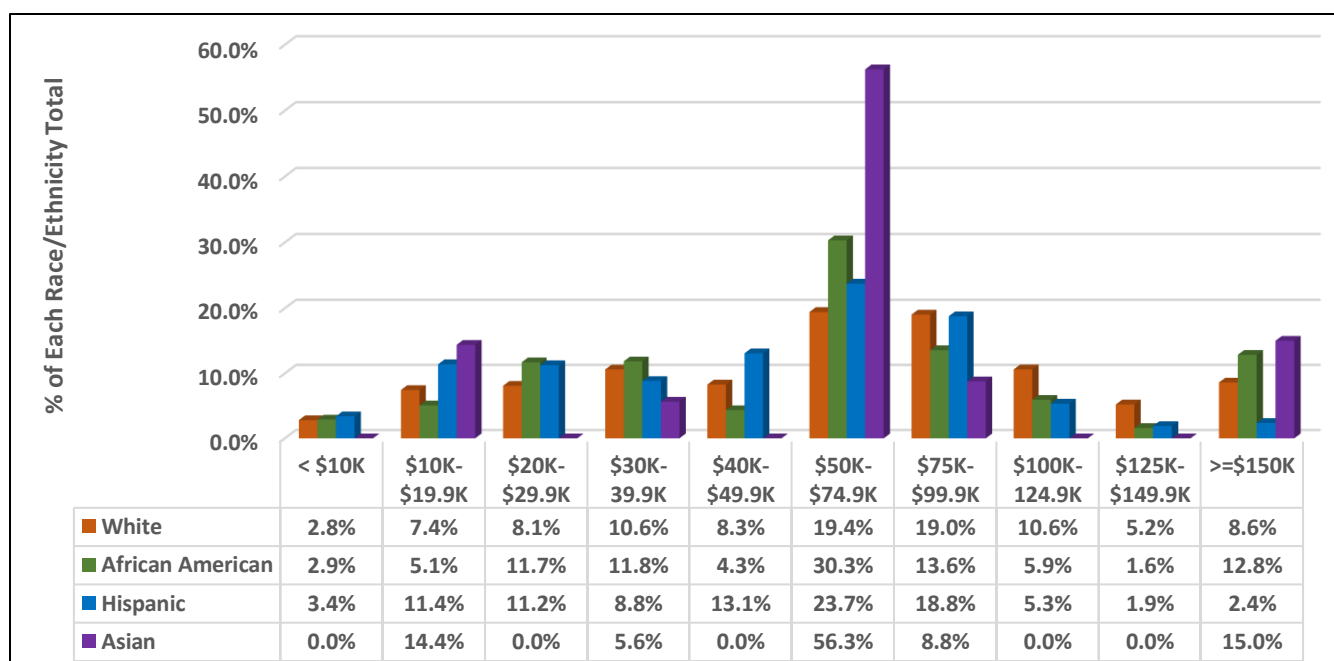


Figure 9 – Percent of Households within Income Ranges by Race/Ethnicity (2011-2015 ACS)

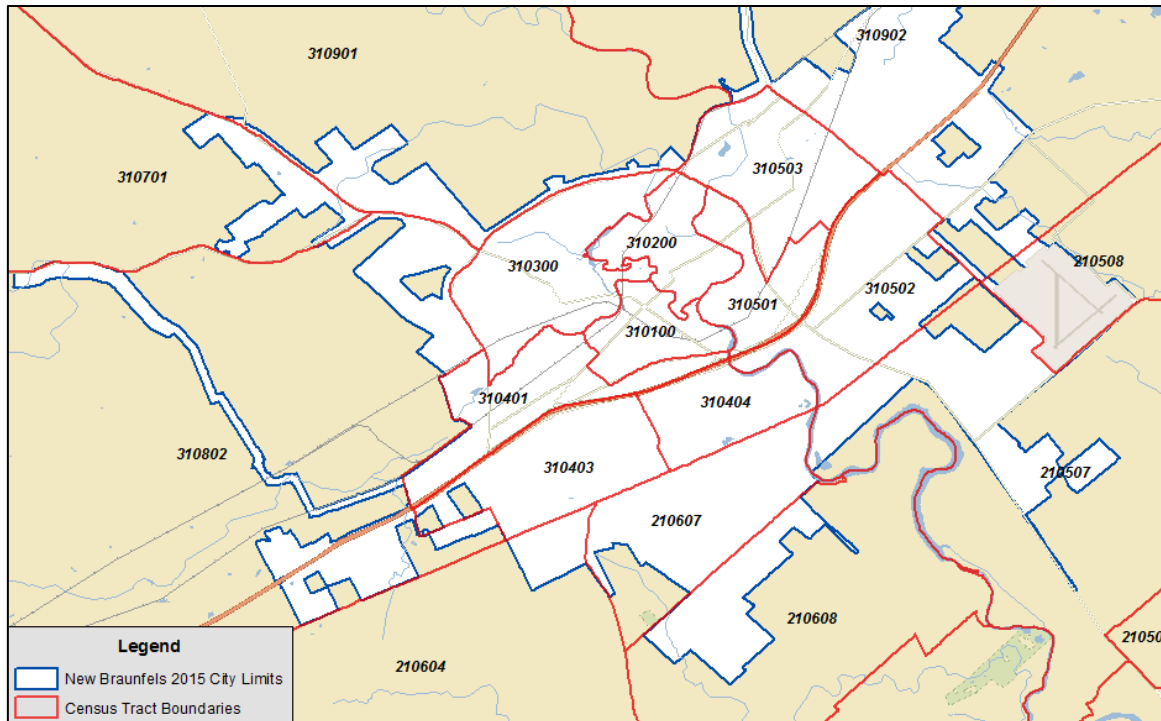


Due to the small sample size in the ACS, much of the data for minorities at the census tract level have been omitted and there are no block group level tables for income by race/ethnicity. However, examining the census tract level data available, of the 18 census tracts partially or entirely within the city, only 1 has information on Asian income, 5 on African American income and 17 on Hispanic income. Of the 5 with median income information for African Americans, only 1 of the households had a higher median income than whites, and only by \$3,687. Only one census tract (310701) had no income information for Hispanics, but of the 17 with data, 8 of the tracts had higher median incomes for Hispanics than whites, ranging from \$164 to \$22,990 greater than the white median incomes. The table below compares the median incomes overall and for whites, African Americans and Hispanics by census tract.

Table 15 – Comparison of Median Incomes by Race/Ethnicity at Census Tract Level

Census Tract	Median Household Income	Median White HH Income	Median African American HH Income	Median Hispanic HH Income
310100	\$50,066.00	\$60,583.00	\$50,972.00	\$41,310.00
310200	\$53,041.00	\$60,652.00	No data	\$29,464.00
310300	\$53,158.00	\$63,833.00	No data	\$35,091.00
310401	\$41,172.00	\$36,071.00	\$31,006.00	\$43,750.00
310403	\$61,373.00	\$56,064.00	No data	\$79,054.00
310404	\$55,093.00	\$59,571.00	No data	\$27,009.00
310501	\$42,150.00	\$42,772.00	No data	\$41,389.00
310502	\$49,435.00	\$44,938.00	\$48,625.00	\$54,632.00
310503	\$56,235.00	\$57,321.00	No data	\$56,222.00
310701	\$94,464.00	\$93,750.00	No data	No data
310802	\$80,875.00	\$90,299.00	\$71,800.00	\$27,005.00
310901	\$102,411.00	\$101,815.00	No data	\$116,471.00
310902	\$71,445.00	\$64,688.00	No data	\$74,954.00
210507	\$51,142.00	\$63,636.00	No data	\$46,023.00
210508	\$74,286.00	\$73,125.00	No data	\$85,417.00
210604	\$85,634.00	\$85,149.00	No data	\$85,313.00
210607	\$50,632.00	\$57,595.00	No data	\$41,156.00
210608	\$70,706.00	\$69,485.00	\$39,706.00	\$85,489.00

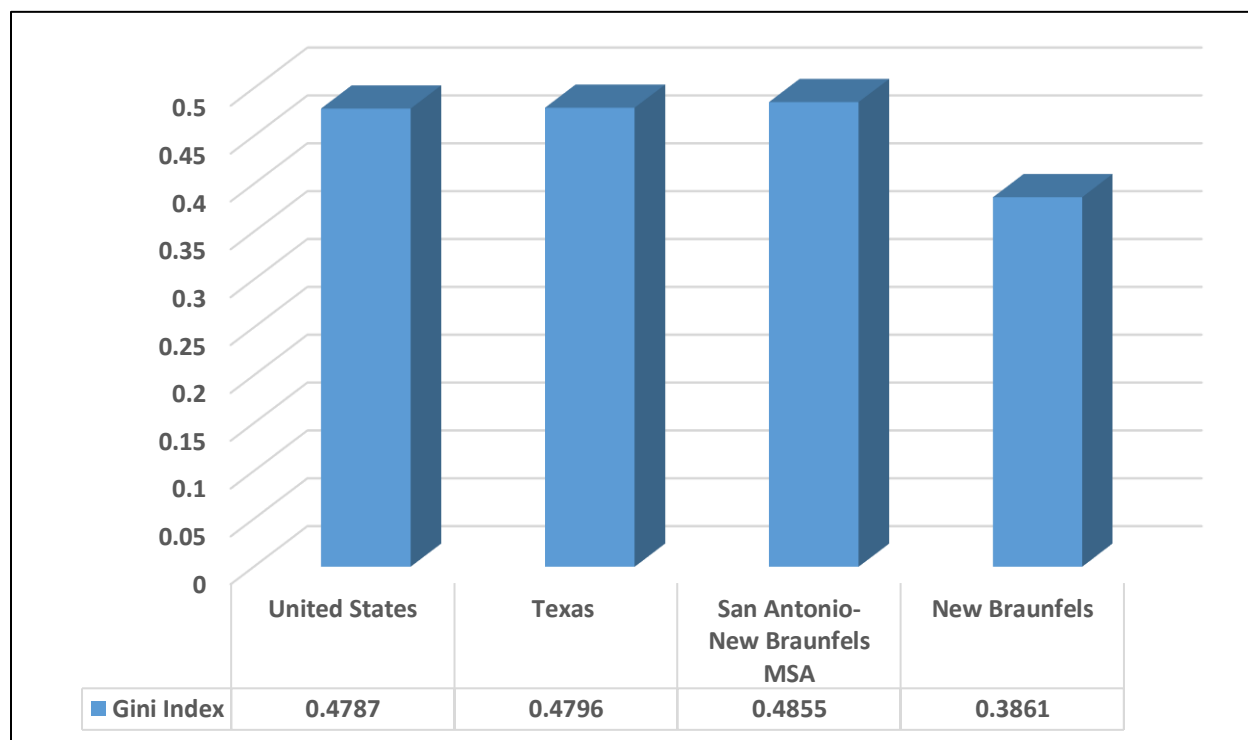
CDBG Low- to Moderate-Income block groups are contained within the highlighted census tracts



Gini Index

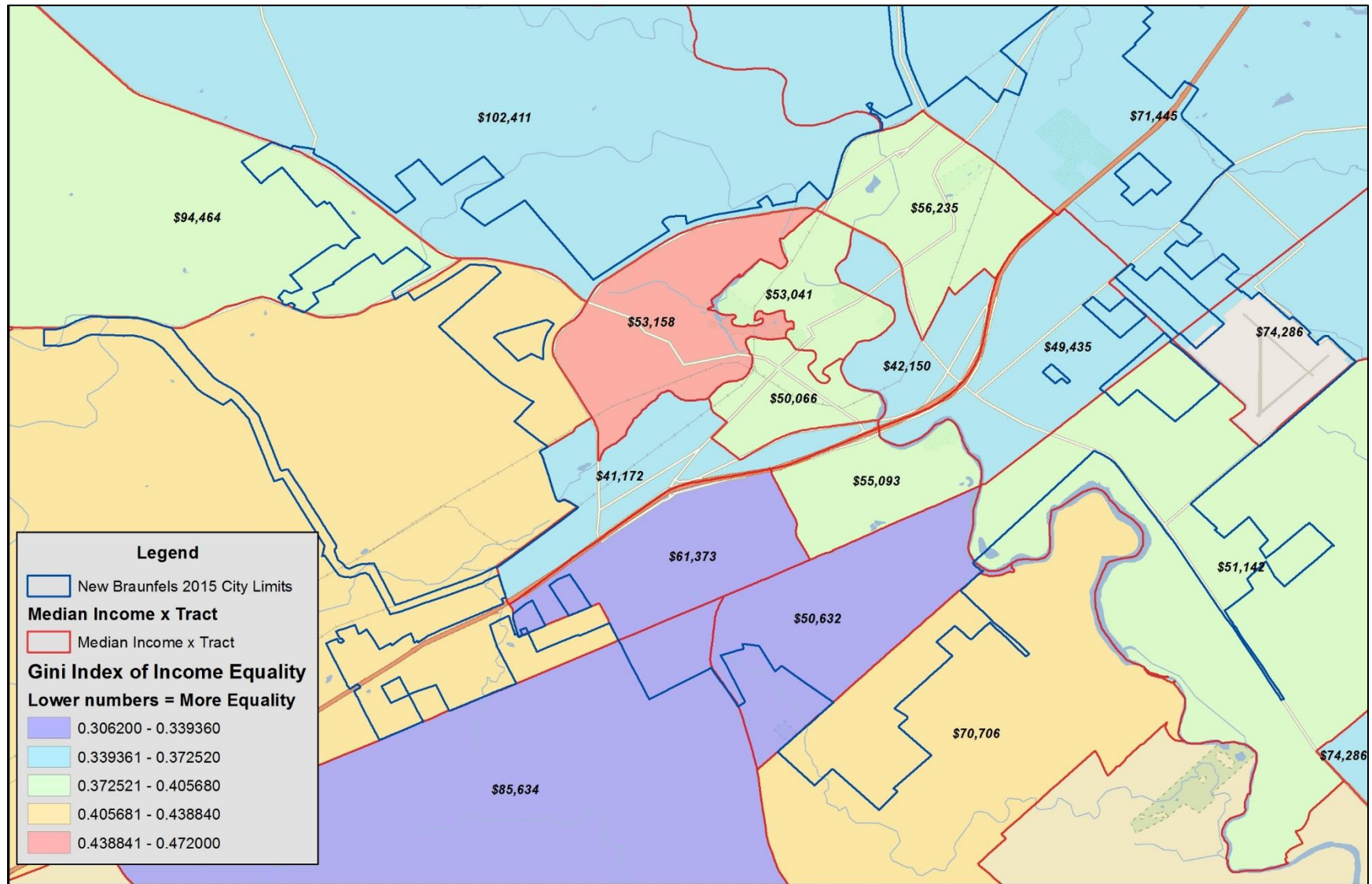
The Gini Index or Coefficient is a measure of the inequality of the income distributions of an area by specific group, such as race/ethnicity. The coefficient can range from zero to one. A coefficient of zero indicates perfect equality with the incomes of all groups measured being the same. A coefficient of one indicates perfect inequality where one group receives all of the income. The degree of equality/inequality falls between zero and one. The Census Bureau calculates the Gini index for the United States, states, counties, places and census tracts. The graph below shows the differences between the Gini Indices for the U.S., Texas, MSA, and new Braunfels from the 2011-2015 ACS. While the San Antonio-New Braunfels region is somewhat higher than the state and U.S., New Braunfels' Gini Index is considerably lower than all of the larger geographic areas, indicating a higher level of income equality among the racial/ethnic groups. The graph below shows the differences between New Braunfels, the San Antonio-New Braunfels MSA, Texas, and the United States.

Figure 10 – Geographic Comparison of Gini Indices (2011-2015 ACS)



The map below shows the census tracts with the Gini index ranges shaded and the median household income for each tract as the tract label.

Map 2 – Census Tract Level Gini Index (2011-2015 ACS)



R/ECAP

HUD has determined racially or ethnically-concentrated areas of poverty (R/ECAPs) at the whole census tract level. For a census tract to be considered a R/ECAP it must have a non-white population of 50% or more and have 40% or more of individuals living below the poverty line or is three or more times the average census tract-level poverty rate for the metropolitan area, whichever is lower. Using the 2010 decennial census and the 2006-2010 American Community Survey (ACS), HUD has determined that there are no R/ECAP areas inside the city limits.

Diversity, Segregation and Integration

There are many methods for calculating and displaying levels of diversity, segregation and integration in a community. One of the ways to show segregation, particularly trends of segregation, is by the use of a dissimilarity index. The dissimilarity index represents the extent to which the distribution of any two groups, such as racial or ethnic groups, differ across subareas of a community. HUD has provided tables detailing dissimilarity between non-Hispanic whites and minorities for 1990, 2000 and 2010. The Affirmatively Furthering Fair Housing Data Documentation from HUD explains the dissimilarity calculation and how the results are interpreted. The formula HUD has used for the index is:

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

D=Dissimilarity Index

WB = White to Black Dissimilarity

j = the jurisdiction, or New Braunfels and the CBSA in this case

i = the subarea, in this case census block groups

N = total number of subareas

**Table 16 – Dissimilarity Indices for New Braunfels and the San Antonio-New Braunfels CBSA
(2017 release of AFFH from 2010 Census)**

	New Braunfels, TX CDBG Jurisdiction				San Antonio-New Braunfels, TX CBSA Region			
Racial/Ethnic Dissimilarity Index	1990	2000	2010	2015	1990	2000	2010	2015
Non-White/White	31.73	25.69	22.12	29.53	48.90	46.39	43.46	45.51
Black/White	34.30	24.69	24.74	23.77	56.18	51.91	47.74	52.08
Hispanic/White	33.35	27.53	24.52	30.92	52.01	49.64	46.08	47.49
Asian or Pacific Islander/White	31.09	14.05	22.36	27.95	34.22	34.26	36.20	41.28

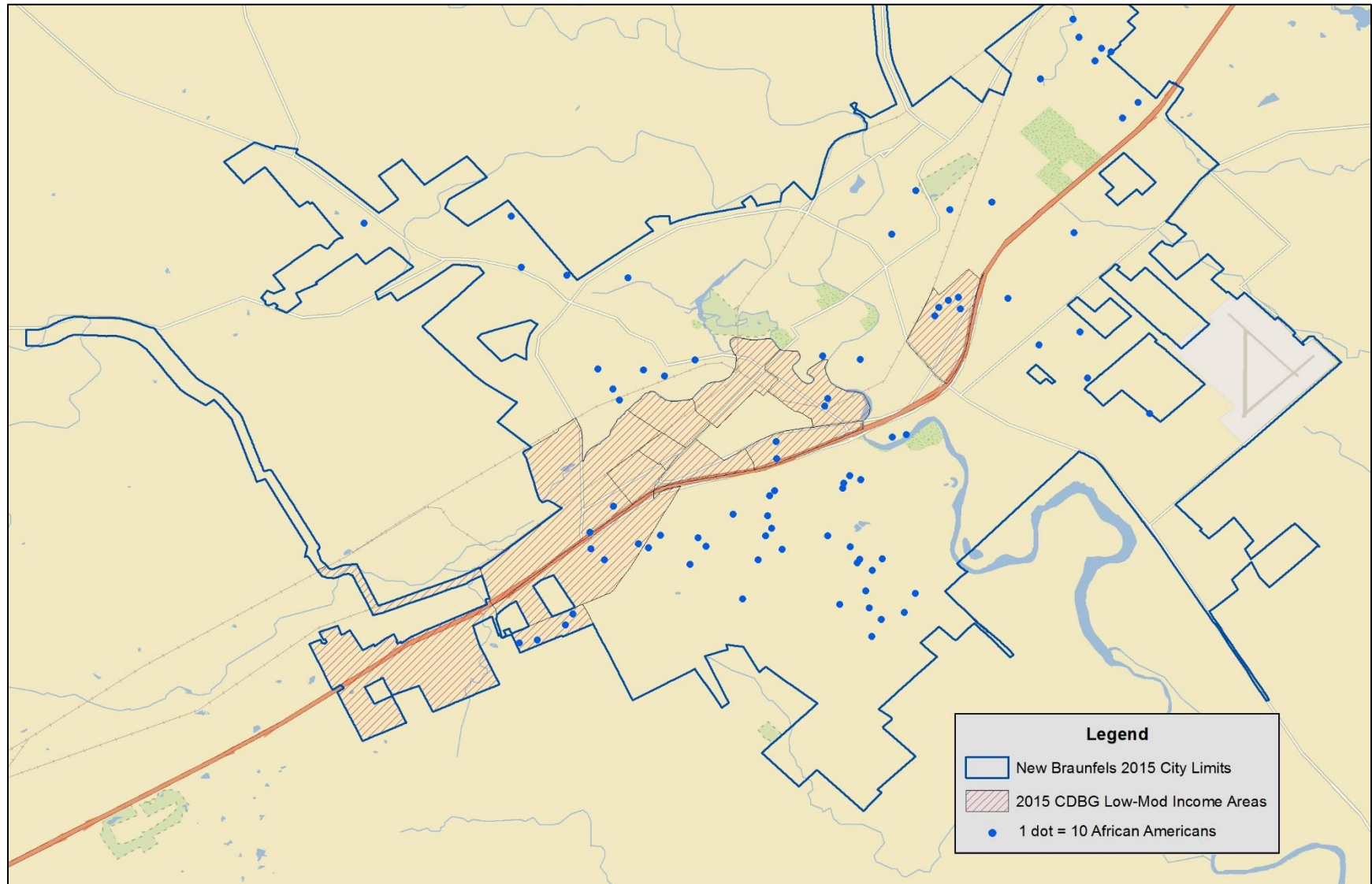
Based on the methodology and data reported by HUD, New Braunfels has low segregation values, especially compared with the region as a whole. The HUD dissimilarity index ranges from 0 to 100, with a value of 0 representing perfect integration between racial groups, and a value of 100 representing total segregation between racial groups. An index of less than 40 shows low segregation/high integration. Scores of 40-54 indicate moderate segregation and scores above 54 show low integration/high segregation. All of New Braunfels' scores are below 40, with the 2010 figures well below 40 in the 22 to 25 range. However, regionally all but the Asian-to-white scores are above 40. The post-2010 figures are suspect as they are based on population estimates. The Asian-to-white score for New Braunfels dropped dramatically between 1990 and 2000 but rose again in 2010 as the number of Asians, though still small, doubled between 2000 and 2010. In many geographic areas, including New Braunfels, the trends from 1990 to 2010 were moving downward with a sharp spike in 2015. As a result, the 2015 indices should not be used to assess the degree of dissimilarity or the trends since 1990.

The dissimilarity index is used to determine overall jurisdictional segregation or integration, but it cannot be used to determine spatial distribution of the groups. Two methods for determining the spatial distribution and level of integration include mapping the percent minority in each subarea, such as the block group, or the level of deviation a subarea's percent minority is from the total jurisdiction's percent minority. One limitation in determining the level of segregation in a community using block group data is the size of the block groups. Block groups comprise multiple neighborhoods, each of which could be highly segregated, but in combination may appear integrated. The maps below show the non-Hispanic white, African American and Hispanic in each Census block with the low- to moderate-income CDBG-eligible block group boundaries superimposed on the dot density maps to show the concentration of low-income with the racial/ethnic population groups. While there are few African Americans in New Braunfels,

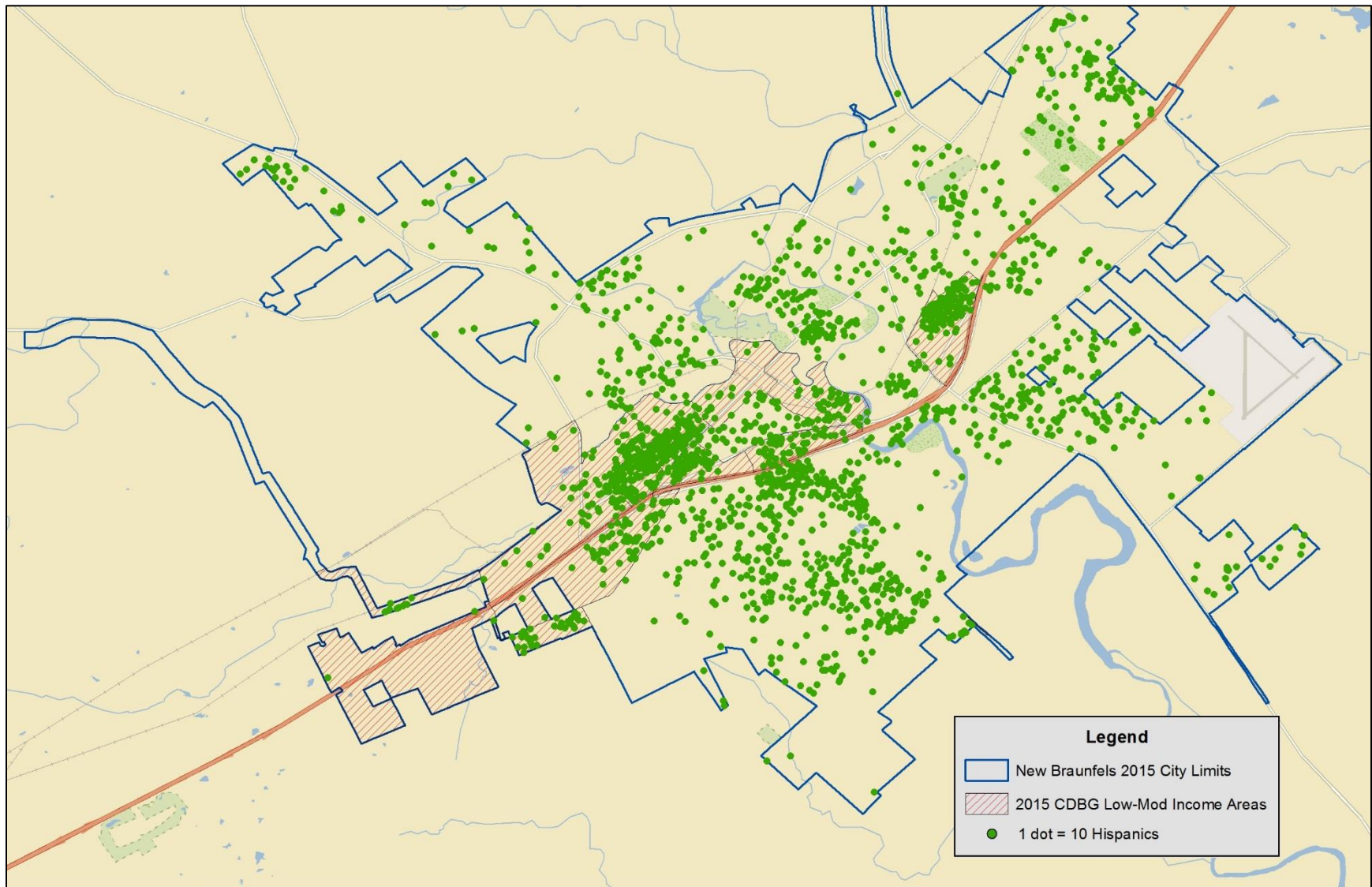
virtually all live outside the low-moderate CDBG areas. There are clusters of Hispanics in the CDBG areas but also a significant cluster south of the CDBG areas and significant numbers scattered north of the areas.

The final map in the group shows diversity by whole block group. The areas that are greater than or equal to 80% white are in the northern part of the city and primarily in block groups that extend far outside the city limits. There is no information available for only the parts of the block groups inside the city limits. There is one area with greater than or equal 80% Hispanic and one area in the southeast that has no single racial/ethnic group in the minority. The majority of the city is comprised of areas with one racial/ethnic group having 50-80% of the population and at least one having 20-50%. These areas are predominately white and Hispanic. Due to the size of the block groups, the diversity map may indicate integration when the populations are segregated within the rather large block group area.

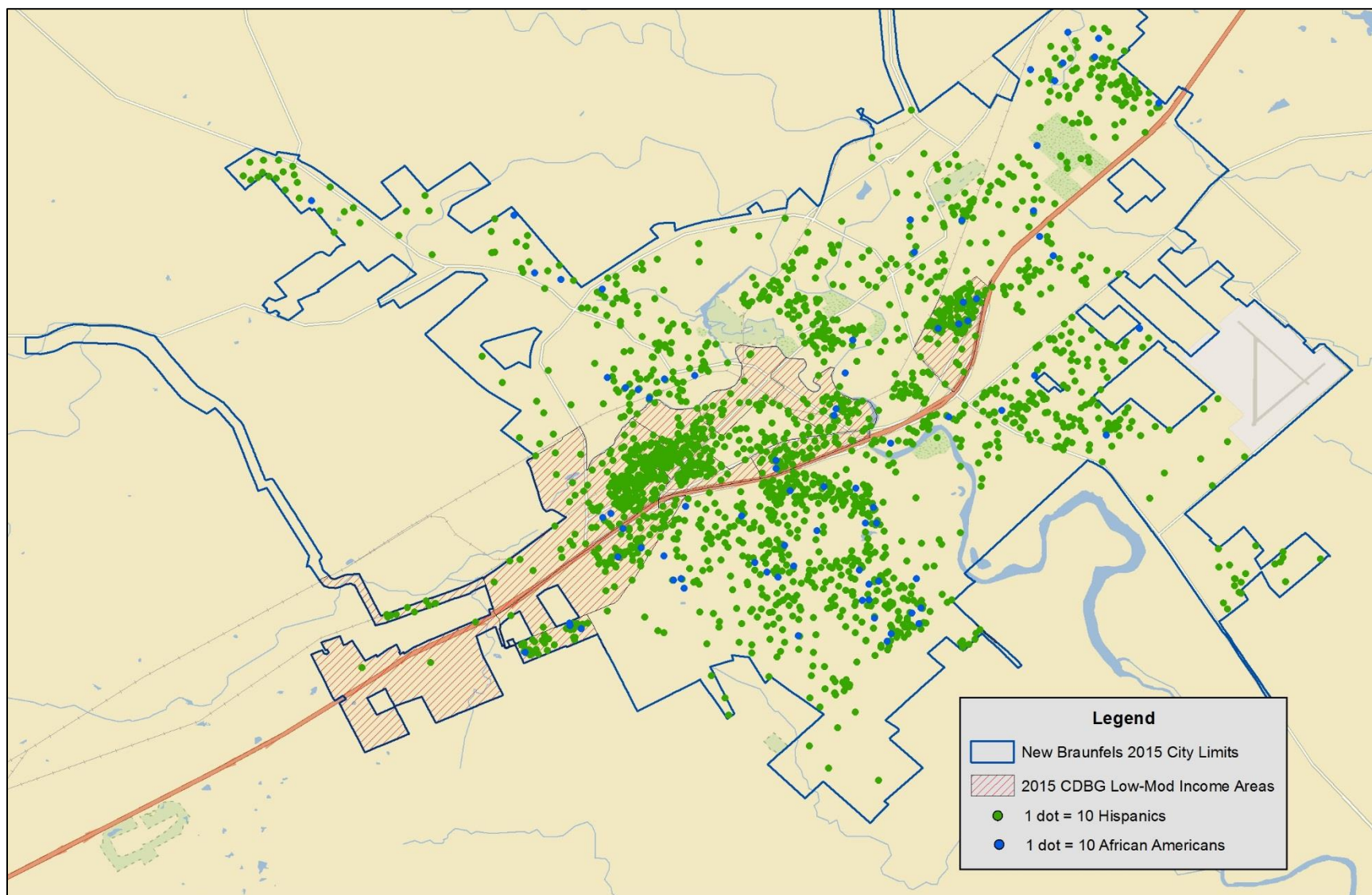
Map 3 – 2010 African American Population by Census Block (2010 Census)



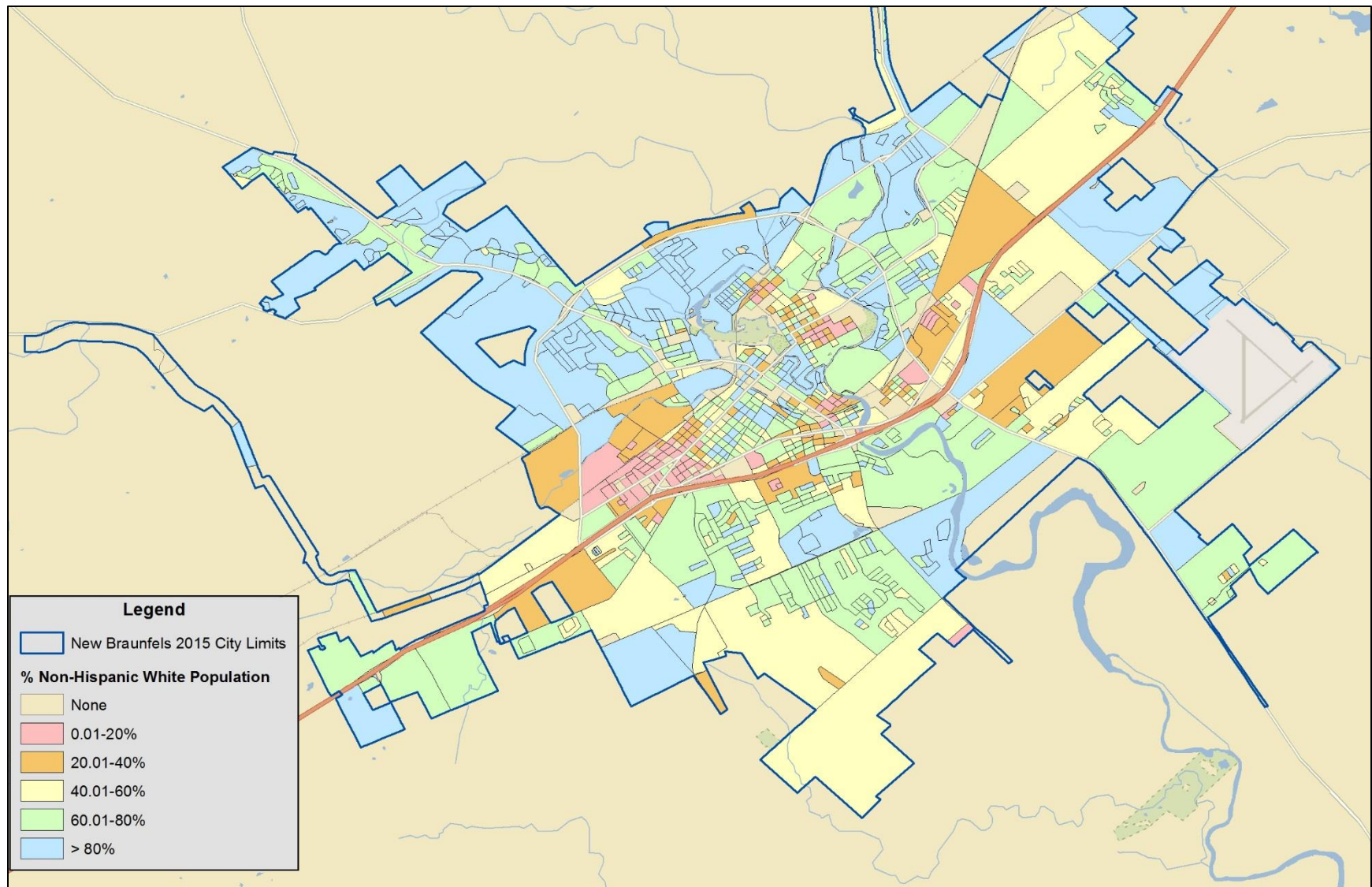
Map 4 – 2010 Hispanic Population by Census Block (2010 Census)



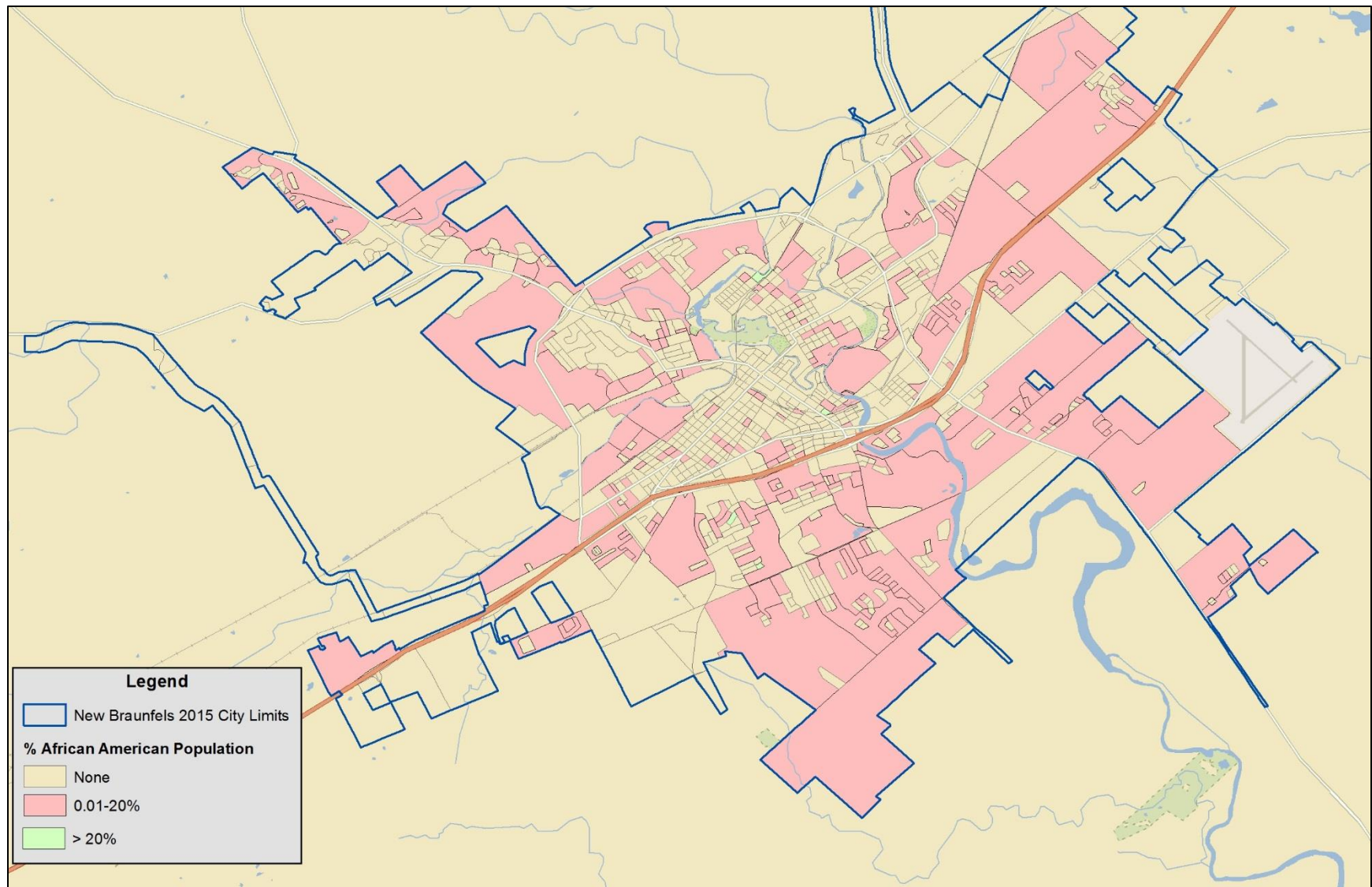
Map 5 – 2010 African American & Hispanic Population by Census Block (2010 Census)



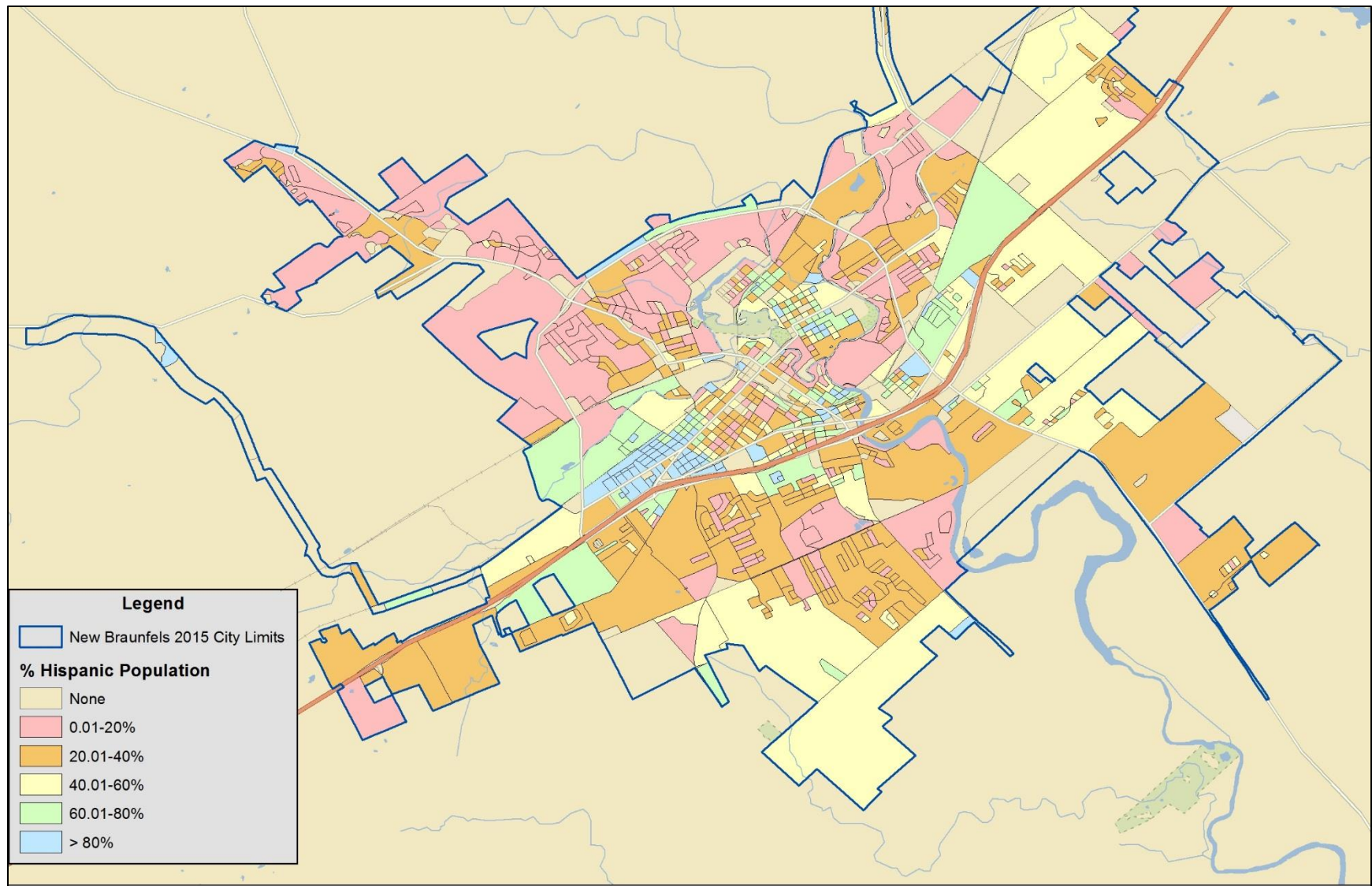
Map 6 – 2010 Percent Non-Hispanic White Population by Census Block (2010 Census)



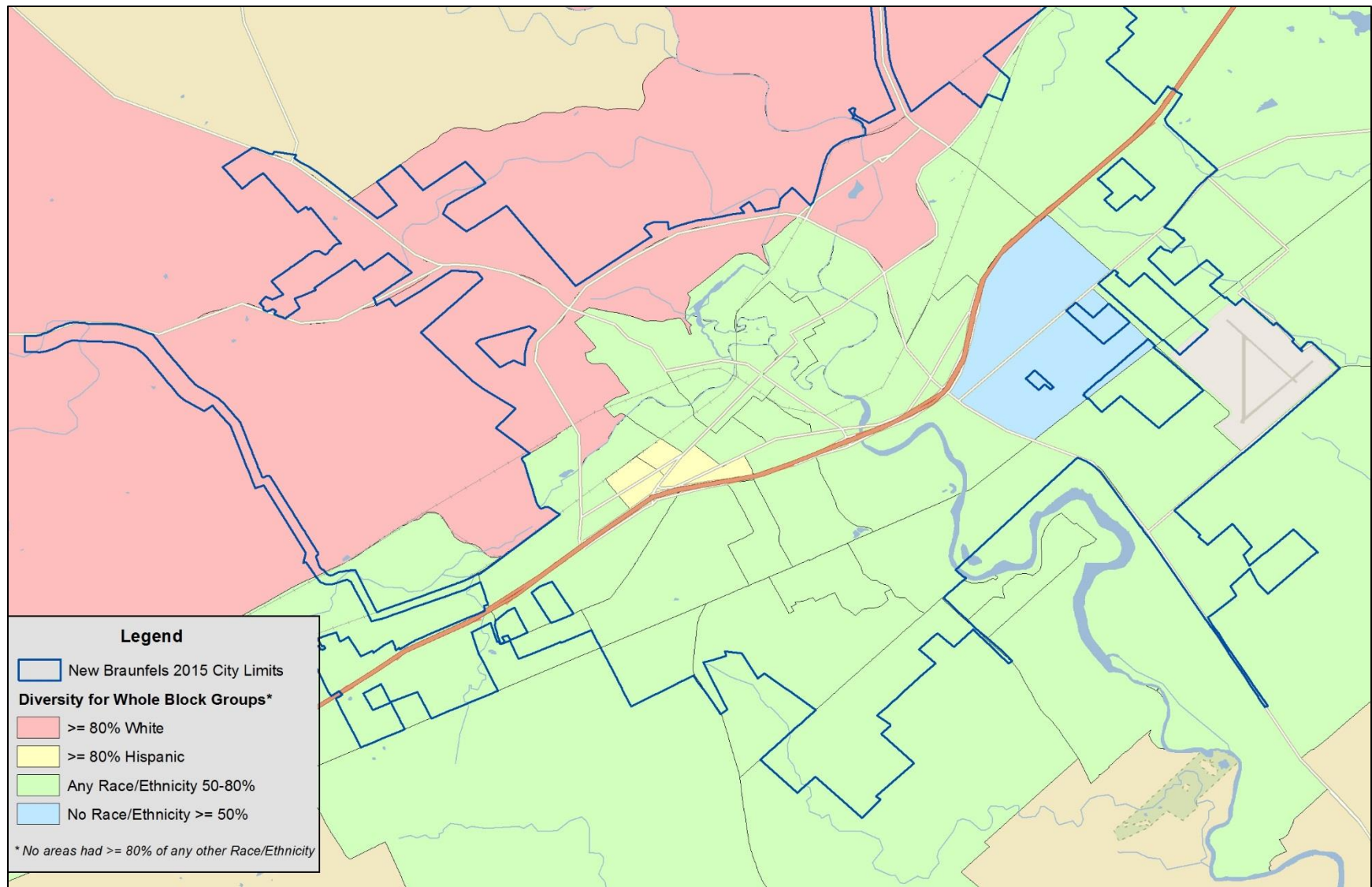
Map 7 – 2010 Percent African American Population by Census Block (2010 Census)



Map 8 – 2010 Percent Hispanic Population by Census Block (2010 Census)



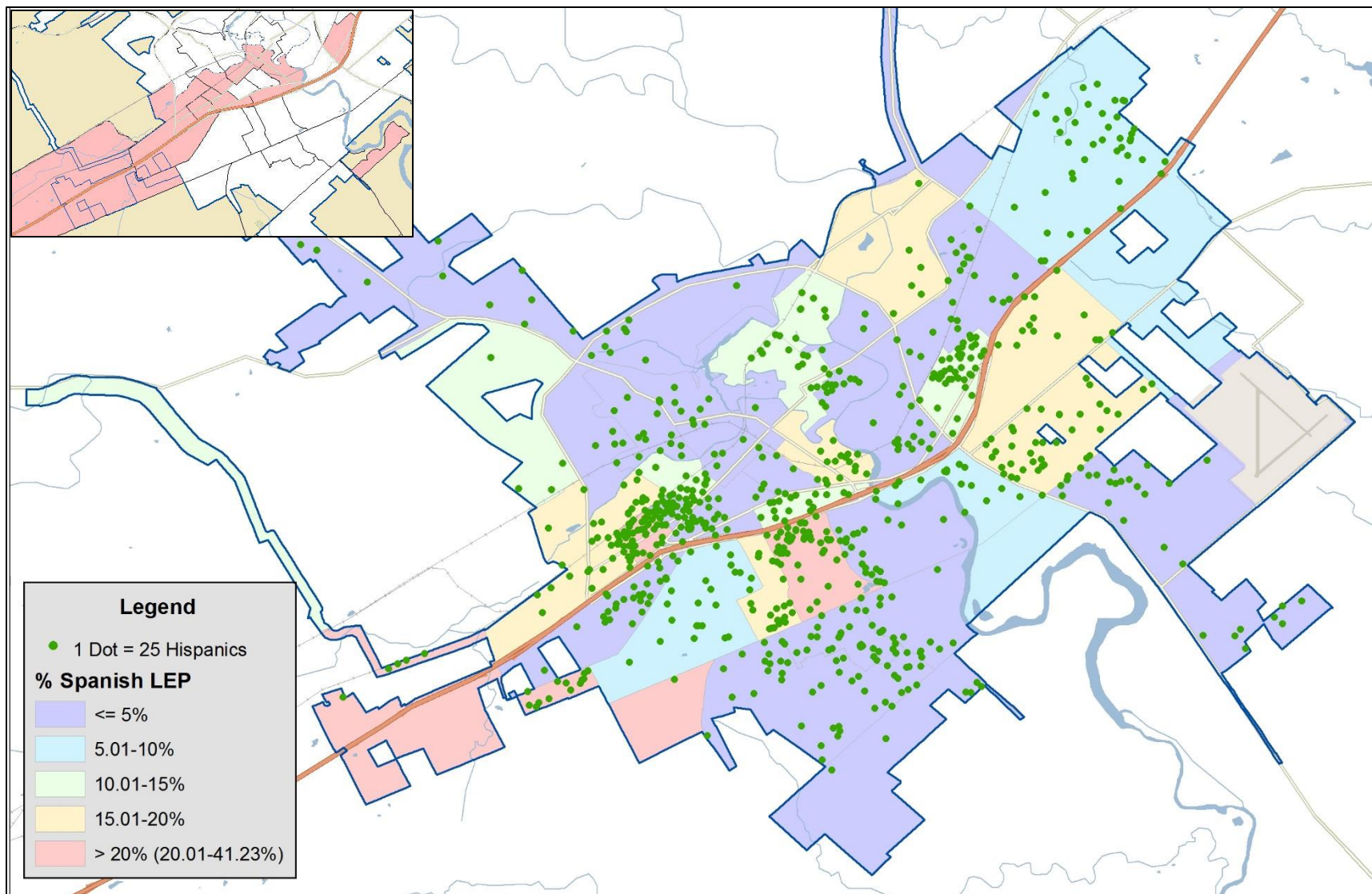
Map 9 – 2010 Diversity (2010 Census)



Factors Contributing to Segregation

Generally, neighborhood segregation is considered to be caused by income dissimilarity among the various racial/ethnic groups, underlying prejudices and political/social discrimination. While underlying prejudices and political/social discrimination still exist throughout the United States and block fair housing choice, there are many other factors contributing to segregation. In New Braunfels, there are few African Americans and even fewer Asians and Native Americans, with all three races living in majority white neighborhoods scattered throughout the city, with no discernable concentrations. Hispanics are also living throughout the city, but there are clusters of Hispanic individuals in certain neighborhoods. One reason for the clusters, particularly north of IH-35 and west of the Guadalupe River within the CDBG low- to moderate-income areas, is limited opportunities due to lower incomes. Another factor, independent of or contributing to the lower incomes, is limited English proficiency. The map below shows the census block-level Hispanic population over the percent of Spanish speakers who have limited English proficiency. Inset into the map is a map of the low- to moderate-income areas. The most pronounced clusters are within the low- to moderate-income areas.

Map 10 – Hispanic Population over Percent Spanish Speakers with Limited English Proficiency
(Population at Census Block Level from 2010 Census, LEP at Block Group Level from 2011-2015 ACS)

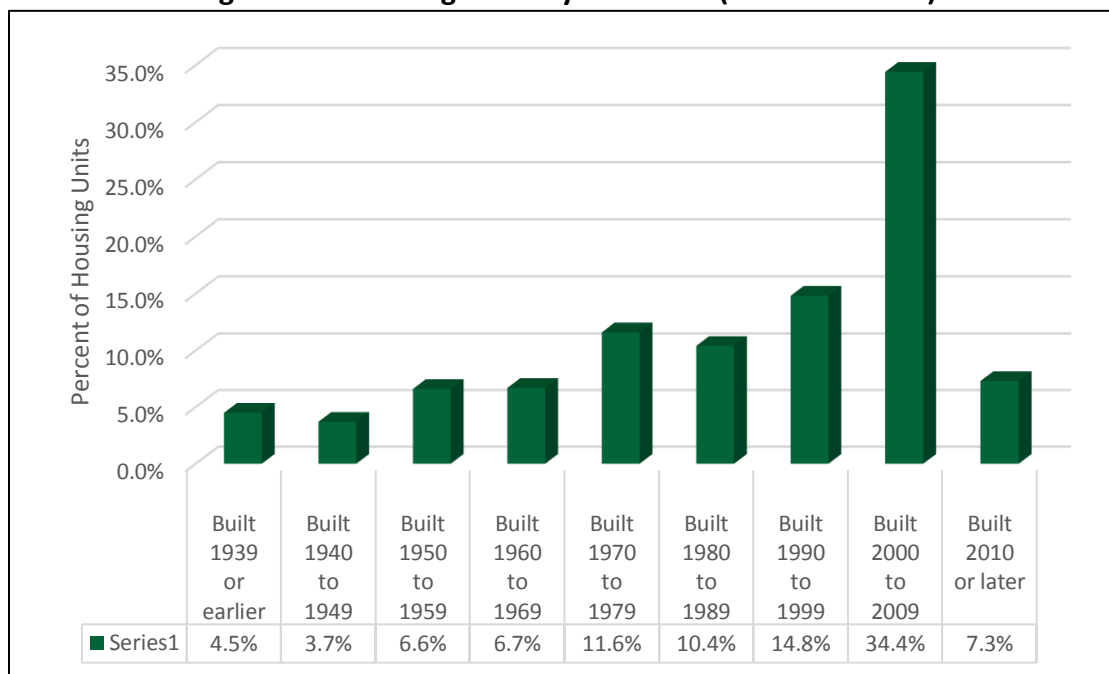


Most of the clusters of Hispanic residents are in the block groups with lower median rents (less than \$1,000/month). African Americans appear to be living across the city in every rent cost range. Most of the Hispanics living north of IH-35 live in areas that are predominately renter occupied, with the exception of one cluster that is over 80% owner occupied. However, over 45% of the Hispanics in those areas are homeowners. Maps in the next section, Housing in New Braunfels, show the distribution of owner occupancy by race/ethnicity.

Housing in New Braunfels

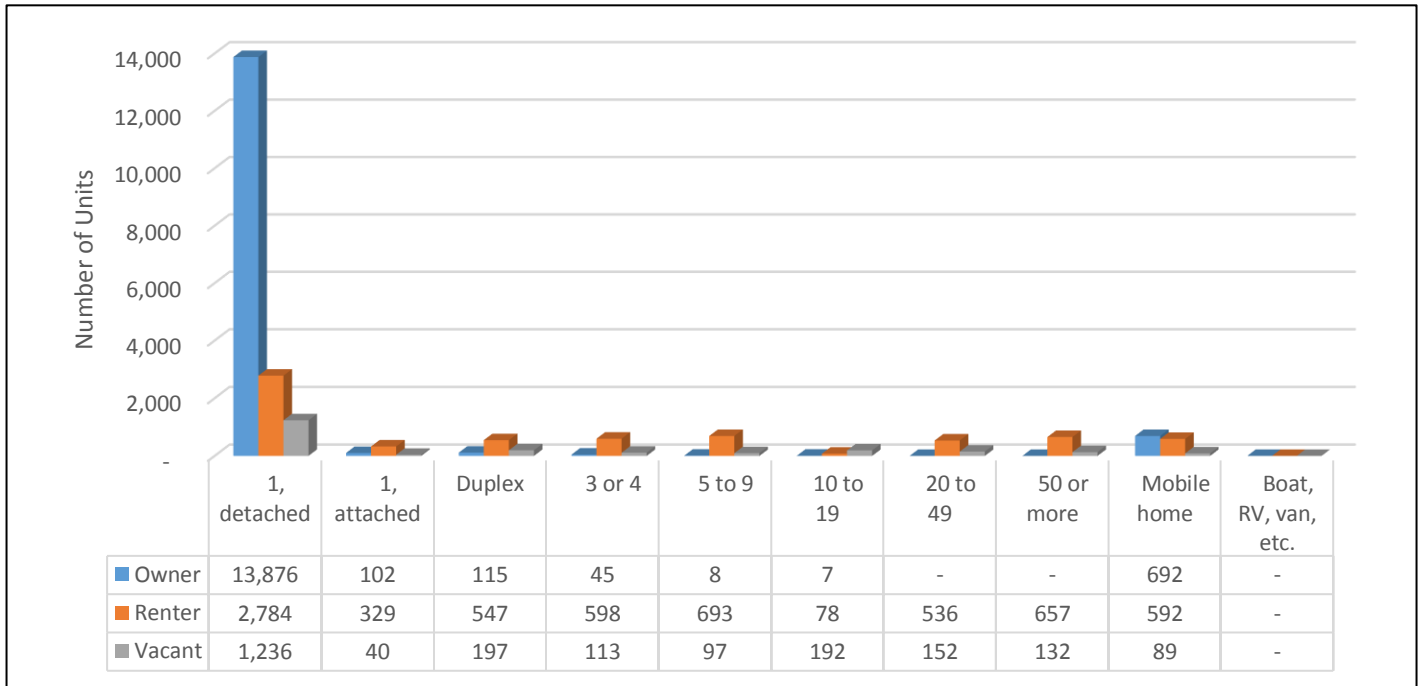
The housing stock in New Braunfels is relatively new, with more than one-third having been built since 2000.

Figure 11 – Housing Stock by Year Built (2011-2015 ACS)



Housing in New Braunfels is predominately single family, with 72.7% of the 24,609 units being single family detached and 1.9% being single family attached. Another 5.6% are mobile homes, primarily in 6 mobile home parks. There are few apartment complexes and no condominiums with more than 19 units per complex.

Figure 12 – Units in Structure by Tenure (2011-2015 ACS)



Only 22.4% of the occupied dwellings are single person households, with nearly half (10% of the total households) of the residents being 65 years or older. The majority of the occupied units (60.7%) have no children under the age of 18 in residence. While the median number of total rooms per dwelling is only 5.5, there is relatively little overcrowding due to the small household size. Only 3.1% of the units have more than 1 person per room. The figures below show the distribution of housing units by the number of rooms and bedrooms and the number of occupied units by number of occupants.

Figure 13 – Housing Units by Number of Rooms (2011-2015 ACS)

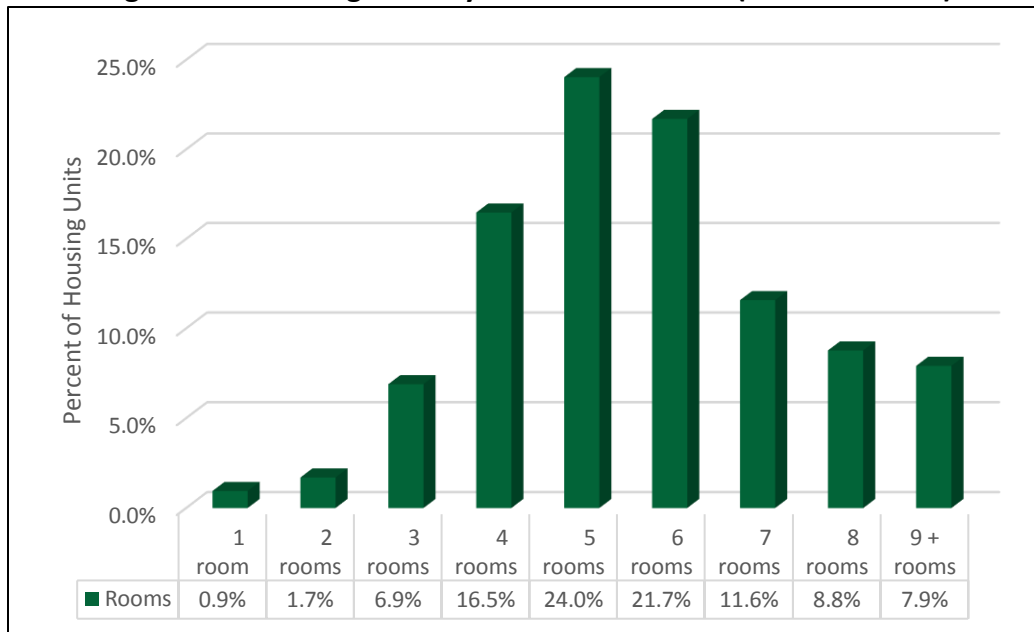


Figure 14 – Housing Units by Number of Bedrooms (2011-2015 ACS)

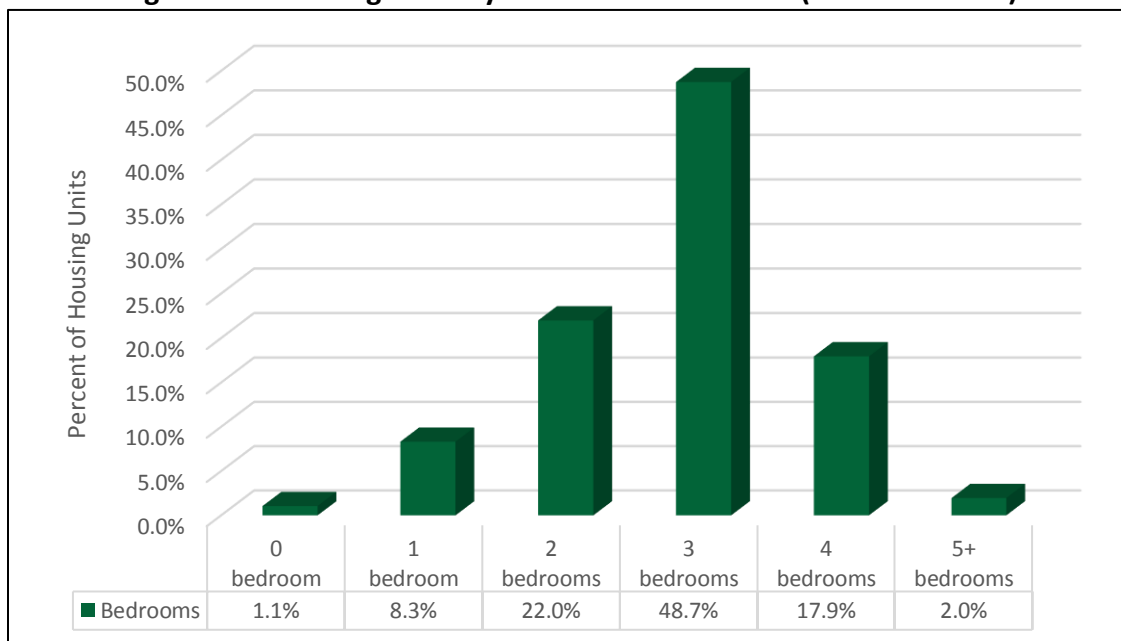
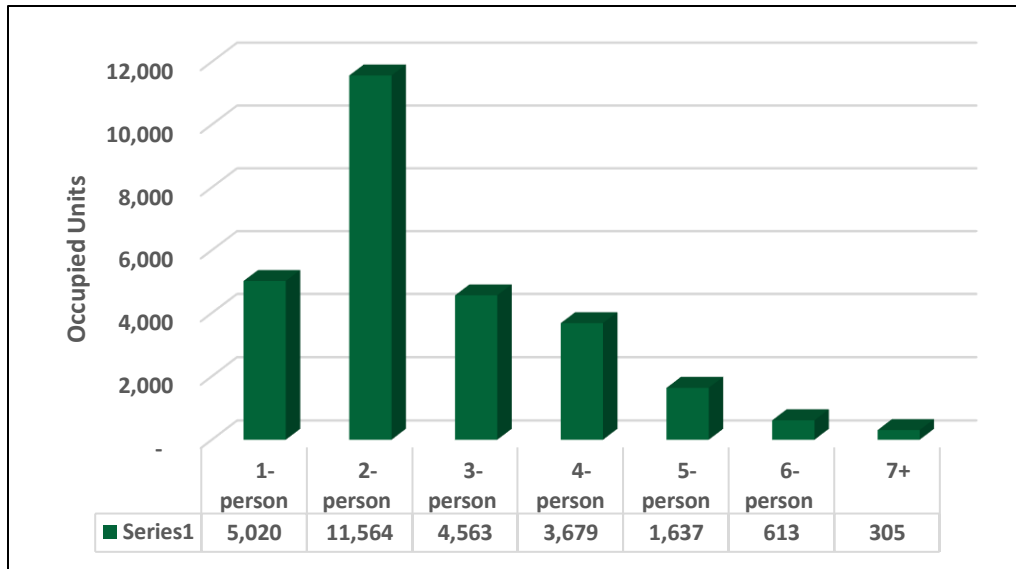
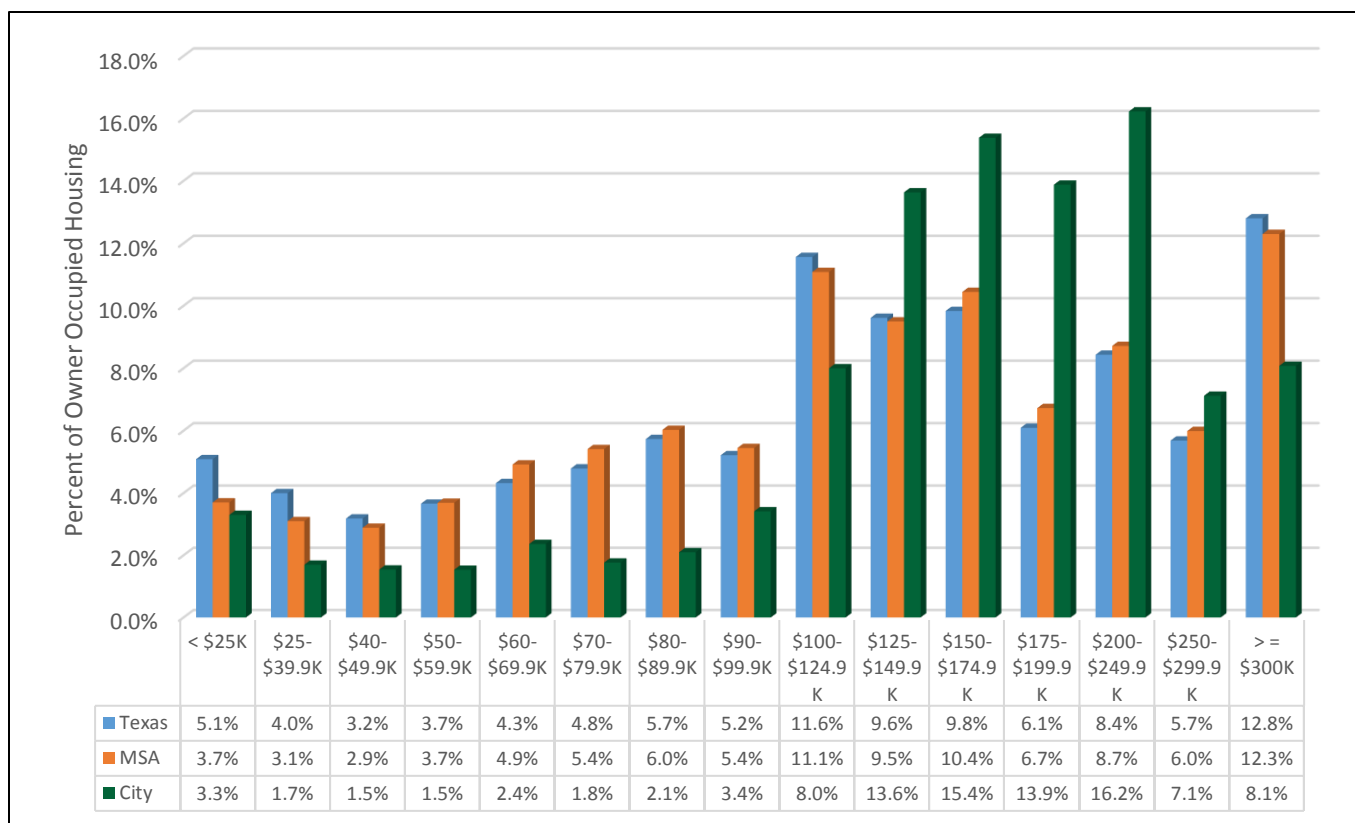


Figure 15 – Occupied Units by Number of Occupants (2011-2015 ACS)



Compared to the state and MSA, New Braunfels has a much lower percent of owner occupied housing valued at a price affordable to the low- to moderate income. Although New Braunfels has a much higher percent of housing valued between \$125,000 and \$300,000, the state and MSA have higher percentages of housing valued over \$300,000. This is typical of established cities that, over time, have become commuter cities for upper-middle income workers in larger neighboring cities like San Antonio and Austin.

Figure 16 – Value of Owner Occupied Housing (2011-2015 ACS)



Disproportionate Housing Needs

HUD requires all states, counties, and cities that receive CDBG funding to submit a 5-Year Consolidated Plan that outlines the current housing and community development conditions and the grantee's plans for the coming 5 years. About 3 years ago, HUD revamped the method of reporting and developed an on-line system that includes a number of pre-populated tables based on data tabulated especially for HUD by the Census Bureau. These tables detail the housing needs of the population based on household composition, income, and race/ethnicity. Unfortunately, the tables for New Braunfels' Consolidated Plan are from the special tabulations of the 2007-2011 5-year American Community Survey (ACS). HUD also provides tables and maps under its Affirmatively Furthering Fair Housing Tool for the same the tables and graphs below outline the data provided by HUD for from the 2009-2013 timeframe. As a result, the numbers provided in the AFFH-T tables do not correspond to the number provided in the Consolidated Plan tables, nor do either set of tables correspond to the most current information from the 2011-2015 ACS data.

HUD's AFFH program is aimed at assessing the degree to which the protected classes are disproportionately served, regardless of income. HUD's CDBG program is aimed at assisting low-to moderate-income residents, defined as those extremely low-income households with incomes of equal to or less than 30% of the area's median income; very low-income households with incomes of 30.01-50% of the area's median income; and low-income (also classified as moderate-income) households with incomes of 50.01-80% of the area's median income. As a result, many of the income-based tables are broken down by the 4 categories of extremely low-, very low-, low- or moderate-, and above 80% of median-income.

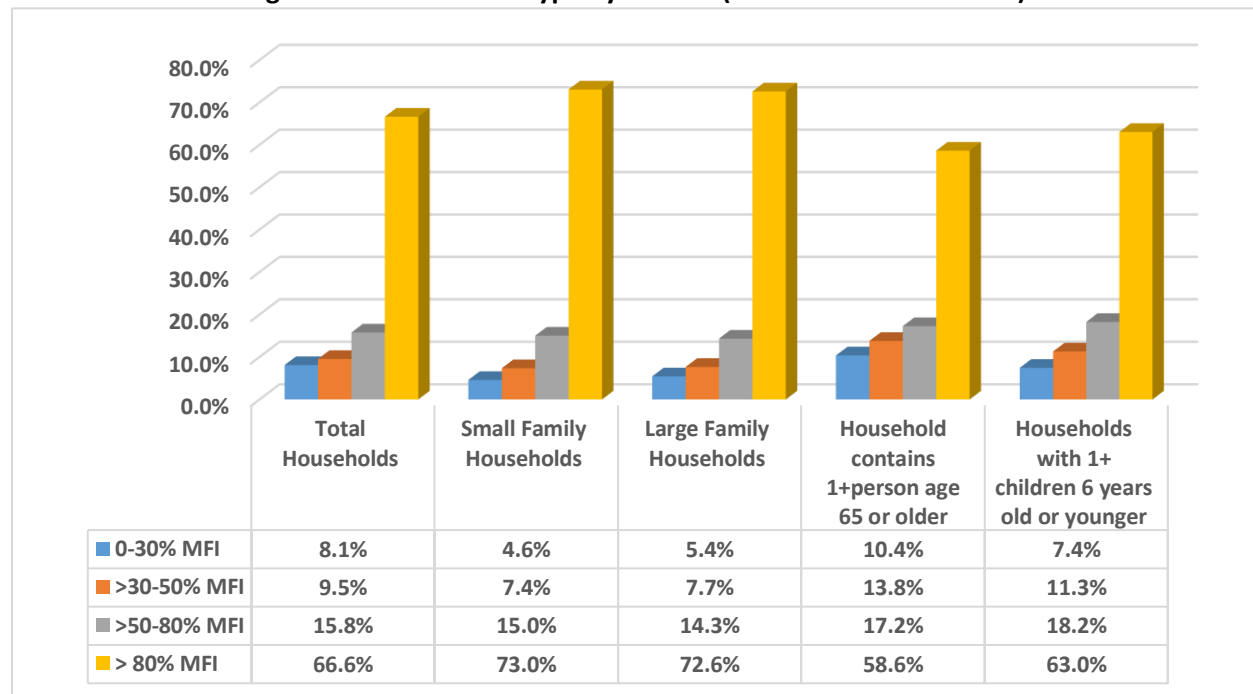
The table below, from the 2017 release of the AFFH Tools shows the homeownership versus rental rates by race/ethnicity for the city and the MSA. For all race/ethnicities given, the owners as a percent of each group's total households outweighs the renters for the city, but for the region, the African Americans and Native Americans have a greater proportion of renters than owners.

Table 17 – Household Tenure by Race/Ethnicity (2017 Release of AFFH-Tools from 2009-2013 ACS)

Homeownership and Rental Rates by Race/Ethnicity	(New Braunfels, TX CDBG) Jurisdiction				(San Antonio-New Braunfels, TX) Region			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	10,200	73.83%	5,095	67.26%	235,880	49.03%	92,035	33.03%
African American, Non-Hispanic	250	1.81%	195	2.57%	22,660	4.71%	28,370	10.18%
Hispanic	3,245	23.49%	2,220	29.31%	208,495	43.34%	145,820	52.33%
Asian or Pacific Islander, Non-Hispanic	20	0.14%	0	0.00%	8,279	1.72%	6,890	2.47%
Native American, Non-Hispanic	30	0.22%	0	0.00%	910	0.19%	1,004	0.36%
Other, Non-Hispanic	79	0.57%	55	0.73%	4,845	1.01%	4,550	1.63%
Total Household Units	13,815	-	7,575	-	481,075	-	278,680	-
Homeownership and Rental Rates by Total Households for Each Race/Ethnicity	(New Braunfels, TX CDBG) Jurisdiction				(San Antonio-New Braunfels, TX) Region			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	10,200	66.69%	5,095	33.31%	235,880	71.93%	92,035	28.07%
African American, Non-Hispanic	250	56.18%	195	43.82%	22,660	44.41%	28,370	55.59%
Hispanic	3,245	59.38%	2,220	40.62%	208,495	58.84%	145,820	41.16%
Asian or Pacific Islander, Non-Hispanic	20	100.00%	0	0.00%	8,279	54.58%	6,890	45.42%
Native American, Non-Hispanic	30	100.00%	0	0.00%	910	47.54%	1,004	52.46%
Other, Non-Hispanic	79	58.96%	55	41.04%	4,845	51.57%	4,550	48.43%
Total Household Units	13,815	64.59%	7,575	35.41%	481,075	63.32%	278,680	36.68%

The graph below shows the total households, small households, large households, households with at least one elderly person, and households with at least one person 6 years old or younger by the above income ranges:

Figure 17 – Household Type by Income (2007-2011 ACS via HUD)



Since the 1970 Decennial Census, the Census Bureau no longer asks residents about the general condition of their dwelling – sound, deteriorated, or dilapidated – but continues to ask questions that are used by HUD as proxies for housing condition – lacking some or all plumbing, lacking complete kitchen, overcrowding (more than 1 person per room), and housing cost greater than 30% of income. The table below details the number of households by income range that have any one or more of these housing problems and having severe housing problems:

Table 18 – General Housing Problem Table (2001-2011 ACS via HUD)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	55	0	100	0	155	0	15	0	0	15
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	0	15	0	15	0	0	25	0	25
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	60	70	70	95	295	30	35	30	25	120
Housing cost burden greater than 50% of income (and none of the above problems)	485	270	170	10	935	315	220	190	60	785
Housing cost burden greater than 30% of income (and none of the above problems)	200	415	1,070	130	1,815	120	270	405	350	1,145
Zero/negative Income (and none of the above problems)	15	0	0	0	15	55	0	0	0	55

The tables below show the household type by income for those with a housing cost burden of more than 30% and of more than 50%, followed by the households by type and income with overcrowding:

**Table 19 – Households with Housing Cost Burden of > 30% by Type and Income
(2007-2011 ACS via HUD)**

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50-80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	200	390	755	1,345	80	145	220	445
Large Related	60	50	170	280	20	45	59	124
Elderly	200	130	130	460	250	270	250	770
Other	320	170	290	780	80	65	85	230
Total need by income	780	740	1,345	2,865	430	525	614	1,569

**Table 20 – Households with Housing Cost Burden of > 50% by Type and Income
(2007-2011 ACS via HUD)**

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	160	125	125	410	80	70	90	240
Large Related	60	0	0	60	20	25	10	55
Elderly	85	20	15	120	145	105	95	345
Other	235	125	30	390	65	30	0	95
Total need by income	540	270	170	980	310	230	195	735

**Table 21 – Households with Overcrowding by Type and Income
(2007-2011 ACS via HUD)**

	Renter					Owner				
	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	45	70	80	35	230	30	25	30	25	110
Multiple, unrelated family households	15	0	0	60	75	0	10	15	0	25
Other, non-family households	0	0	4	0	4	0	0	15	0	15
Total need by income	60	70	84	95	309	30	35	60	25	150

The HUD tables below show the households with housing problems by race/ethnicity and household type, as well as for severe housing cost burden (cost > 50% of income) as the primary housing problem. Because Census information is the only data on housing conditions that is consistent and available throughout the country, the definition of “housing problems” is limited to the variables for which the Census surveys collect information. As a result, HUD’s definition of “housing problems” is having one or more of four conditions: lacking complete kitchen facilities, lacking complete plumbing, being overcrowded with more than one person per room (total rooms, not bedrooms), and/or having a housing cost burden of more than 30% of income. The definition of “severe housing problems” varies from data set to data set, but generally

includes: lacking complete kitchen facilities, lacking complete plumbing, being severely overcrowded with more than 1.5 persons per room, or having a housing cost burden of more than 50% of income. There are very few dwellings lacking complete plumbing and usually only mini-efficiencies (also known as single-room occupancy) lack complete kitchens. As a result, the major housing problems are overcrowding and heavy housing cost burden.

Table 22 – Housing Problems* & Severe Housing Problems
by Racial/Ethnic Groups
(AFFH Tools from 2017 release of 2009-2013 ACS)**

	New Braunfels			SA-NB MSA
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	% with problems
Race/Ethnicity				
White	4,120	15,300	26.93%	25.41%
African American	154	444	34.68%	41.10%
Hispanic	2,320	5,464	42.46%	38.54%
Asian	20	20	100.00%	32.70%
Native American	4	28	14.29%	37.73%
Other	65	133	48.87%	36.66%
<i>Total</i>	<i>6,675</i>	<i>21,390</i>	<i>31.21%</i>	<i>32.90%</i>
Household Type & Size				
Family HHs with < 5 people	3,220	12,825	25.11%	26.21%
Family HHs with 5+ people	1,010	2,328	43.38%	46.45%
Non-family HHs	2,450	6,235	39.29%	39.89%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	% with severe problems
Race/Ethnicity				
White	1,600	15,300	10.46%	11.96%
African American	100	444	22.52%	21.32%
Hispanic	1,129	5,464	20.66%	22.03%
Asian	0	20	0.00%	17.14%
Native American	4	28	14.29%	22.91%
Other	0	133	0.00%	19.38%
<i>Total</i>	<i>2,830</i>	<i>21,390</i>	<i>13.23%</i>	<i>17.51%</i>

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

** The four severe housing problems for this HUD-provided table are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room and a housing cost burden greater than 50%.

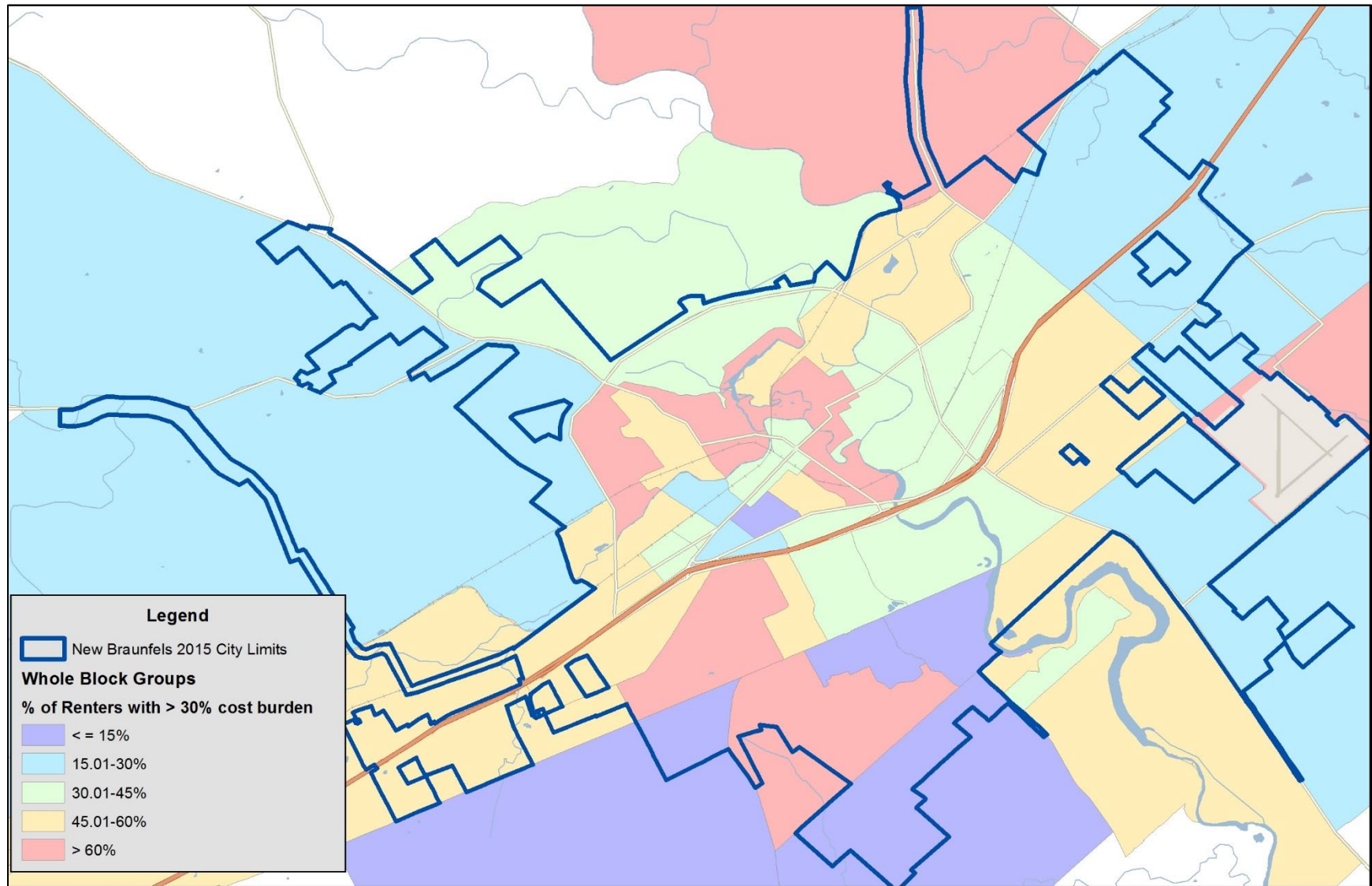
HUD considers disproportion to occur when there is more than a 10 percentage point difference between white and non-white groups. Because there are so few Asians counted, no conclusion can be drawn regarding their level of disproportionate housing need. However, African Americans have a 7.75 percentage point higher rate of housing problems and a 12.06 percentage point higher rate of severe housing problems than non-Hispanic whites. Hispanics have a 15.53 percentage point higher rate of housing problems than non-Hispanic whites and a 7.78 percentage point higher rate than African Americans. Additionally, Hispanics have a 10.2 percentage point higher rate of severe housing problems than non-Hispanic whites. African Americans have more than twice the rate of white households and just under twice the rate of Hispanic households with a severe housing cost burden. Though Native Americans have twice the rate as whites, with only 28 households, compared with 15,300, there is not a large enough number to draw any conclusions. None of the 20 Asian households have a severe cost burden.

**Table 23 – Severe Housing Cost Burden by Racial/Ethnic Groups
(AFFH Tools from 2017 release of 2009-2013 ACS Data)**

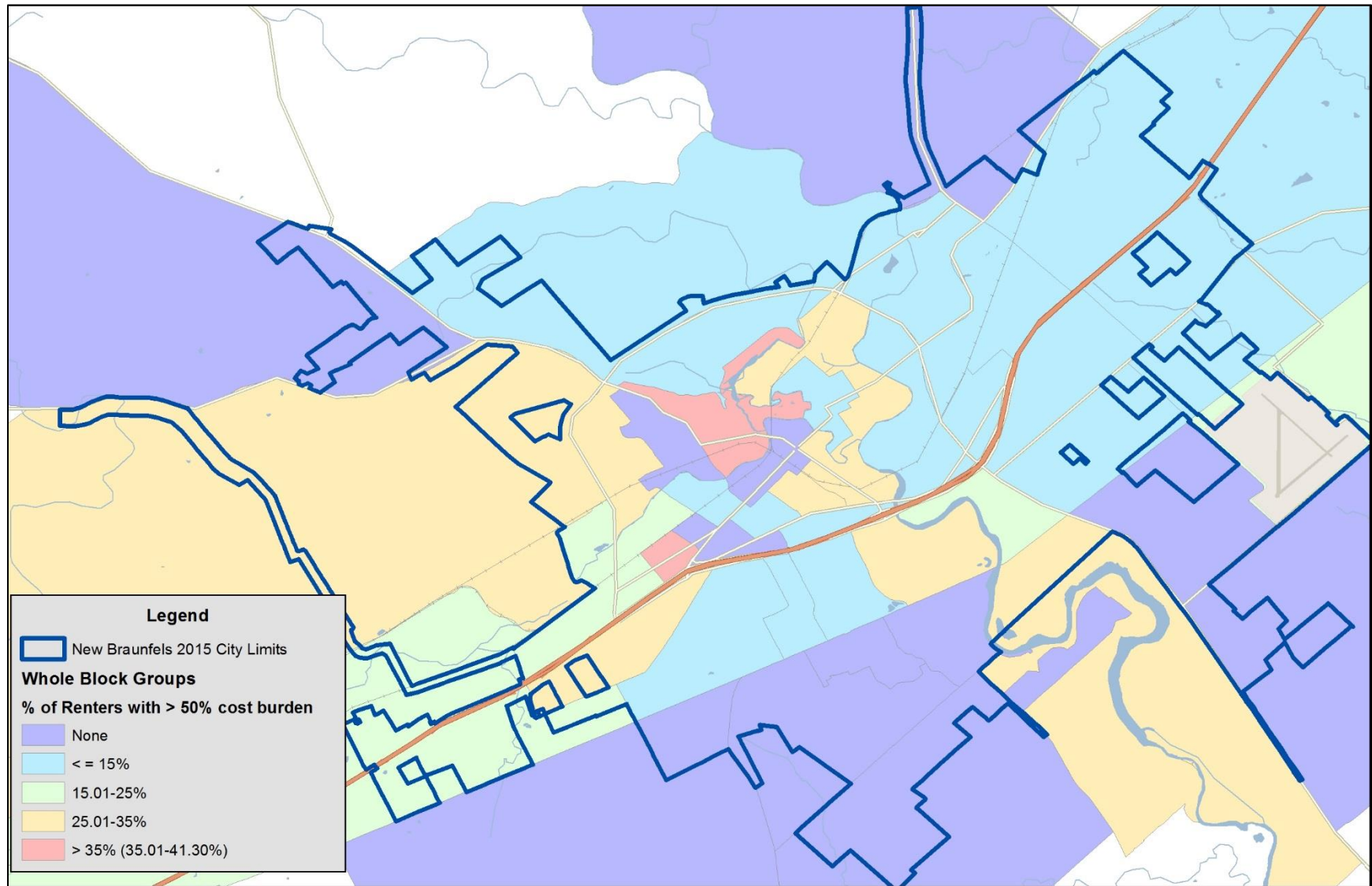
	New Braunfels			SA-NB MSA
Households experiencing a severe cost burden	# with severe cost burden	# households	% with severe cost burden	% with severe cost burden
Race/Ethnicity				
White	1,210	15,300	7.91%	9.98%
African American	90	444	20.27%	17.63%
Hispanic	605	5,464	11.07%	14.69%
Asian	0	20	0.00%	12.11%
Native American	4	28	14.29%	20.49%
Other	0	133	0.00%	16.57%
<i>Total</i>	<i>1,909</i>	<i>21,390</i>	<i>8.92%</i>	<i>12.84%</i>
Household Type and Size				
Family households, <5 people	839	12,825	6.54%	10.17%
Family households, 5+ people	165	2,328	7.09%	10.43%
Non-family households	915	6,235	14.68%	18.86%

The maps below show the percent of renters with a housing cost burden of more than 30% and 50% of the household income. The third and fourth maps show the block groups by percent of housing cost burden over 50% with the block-level number of Hispanics superimposed. The African American households are too widely dispersed and too few in number for a meaningful representation on the map. Note that the rental information is by household and the Hispanic counts are by population.

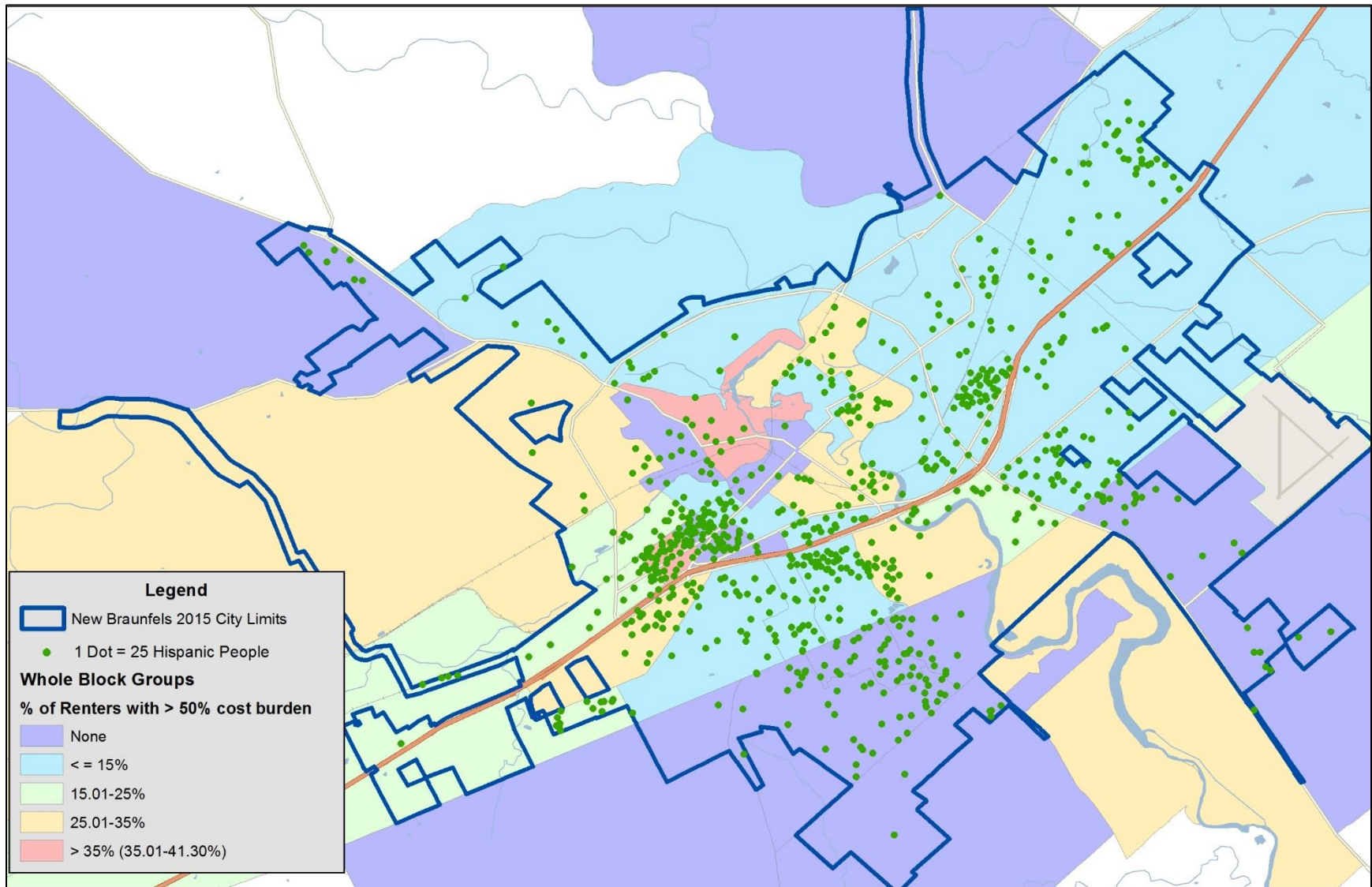
Map 11 – Renters with Housing Cost Burden of Greater Than 30% of Income (2011-2015 ACS)



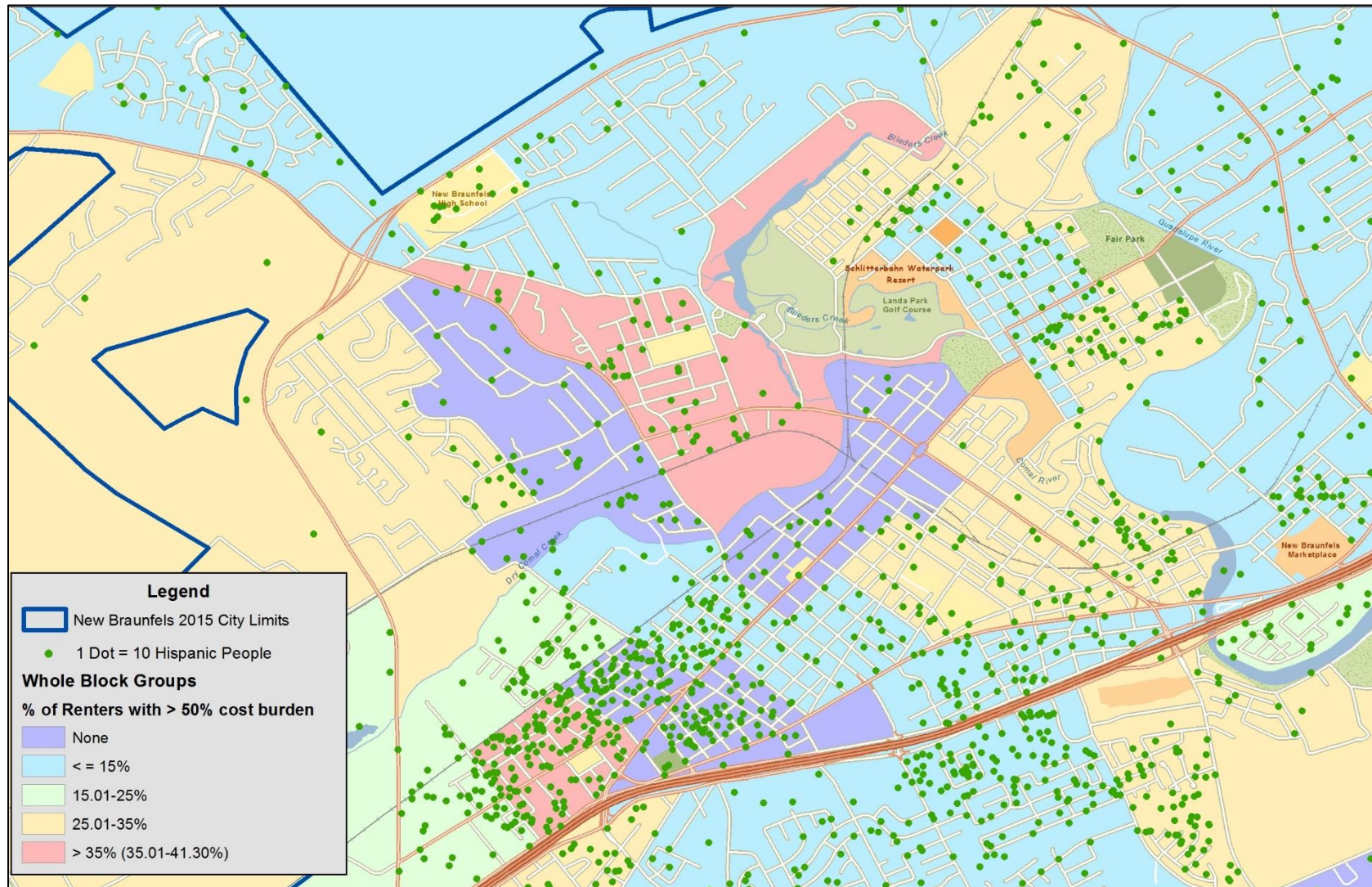
Map 12 – Renters with Housing Cost Burden of Greater Than 50% of Income (2011-2015 ACS)



Map 13 – Hispanic Population over Renters with Housing Cost Burden of Greater Than 50% of Income (2011-2015 ACS)



Map 14– Hispanic Population over Renters with Housing Cost Burden of Greater Than 50% of Income Inside Loop (2011-2015 ACS)



Disabled individuals have become one of the most often protected classes experiencing discrimination in rental housing. According to the 2011-2015 ACS data, 12.1% of New Braunfels noninstitutionalized residents and 22.1% of Veterans have a disability. The table below shows the distribution by race/ethnicity, age, and disability type.

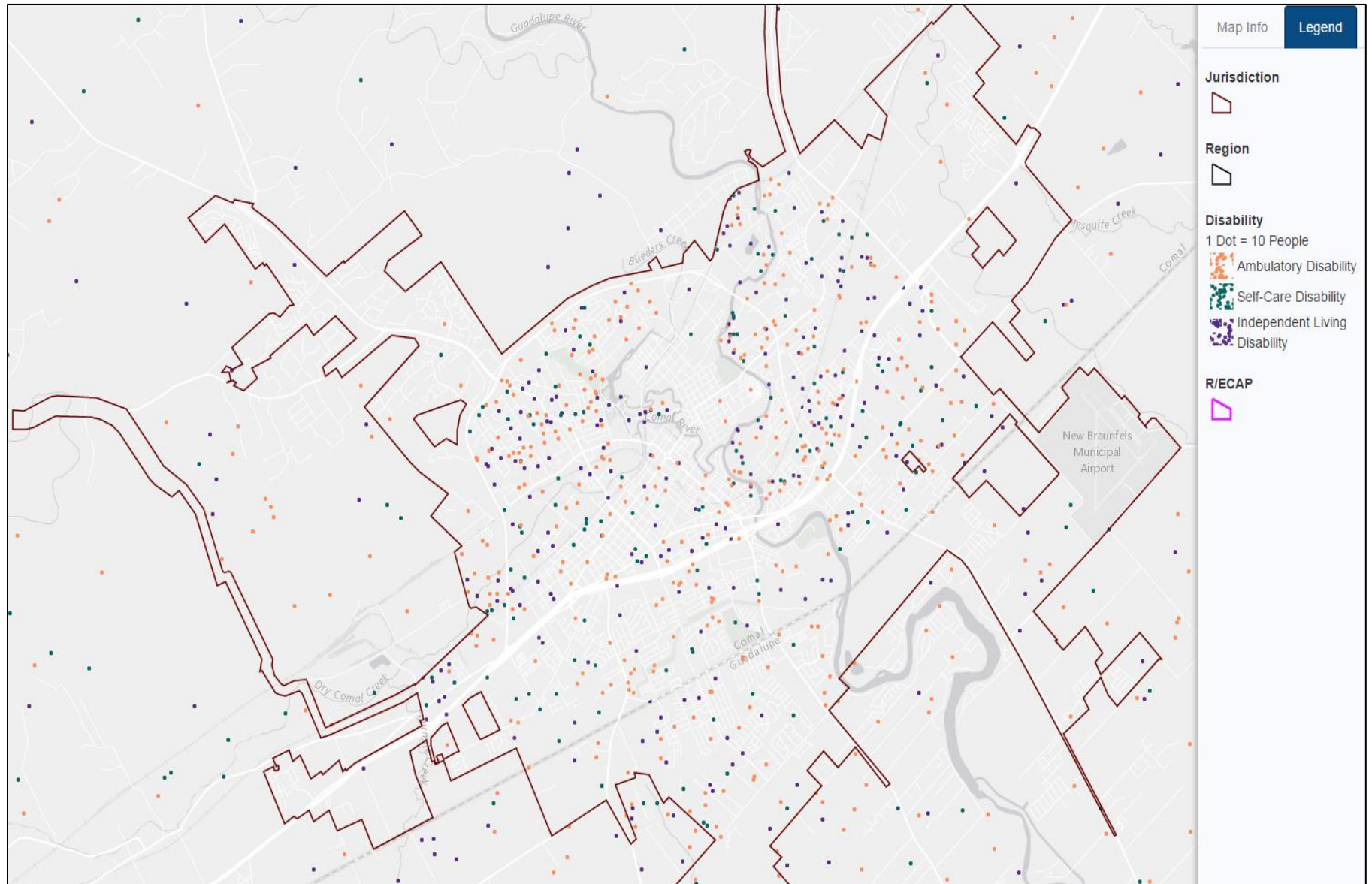
Table 214

Table 24 – Disabled Population by Race/Ethnicity, Age, and Disability Type (2011-2015 ACS)

	Total	With a disability	Percent with a disability
Total civilian noninstitutionalized population	63,233	7,657	12.1%
RACE AND HISPANIC ORIGIN			
White alone, not Hispanic or Latino	37,504	4,798	12.8%
Black or African American alone	1,538	240	15.6%
Hispanic or Latino	22,946	2,578	11.2%
Asian alone	550	23	4.2%
American Indian and Alaska Native alone	105	0	0.0%
Other	590	18	3.1%
AGE			
Under 5 years	4,786	60	1.3%
5 to 17 years	12,689	627	4.9%
18 to 34 years	14,834	959	6.5%
35 to 64 years	22,561	2,963	13.1%
65 to 74 years	4,707	1,265	26.9%
75 years and over	3,656	1,783	48.8%
DISABILITY TYPE*			
With a hearing difficulty		2,462	3.9%
With a vision difficulty		1,798	2.8%
With a cognitive difficulty		2,773	4.7%
With an ambulatory difficulty		4,160	7.1%
With a self-care difficulty		1,814	3.1%
With an independent living difficulty		2,763	6.0%
<i>Totals by type exceed total disabled population due to individuals having multiple disabilities</i>			

The next two maps show the location of disabled individuals by type of disability from the AFFH Tools. The database for the maps is the 2009-2013 ACS.

Map 15 –Population by Ambulatory, Self-Care, or Independent Living Disability (AFFH-T)

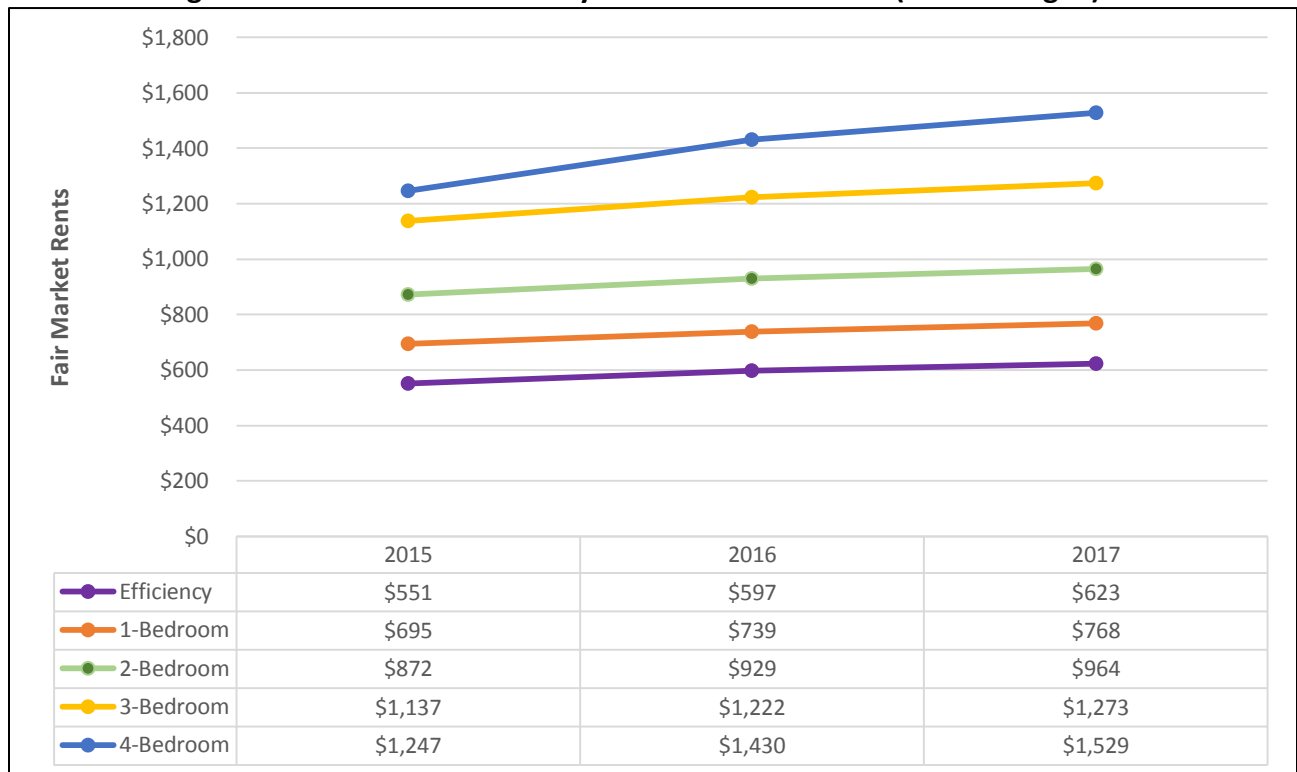


Housing Market

Rental Market

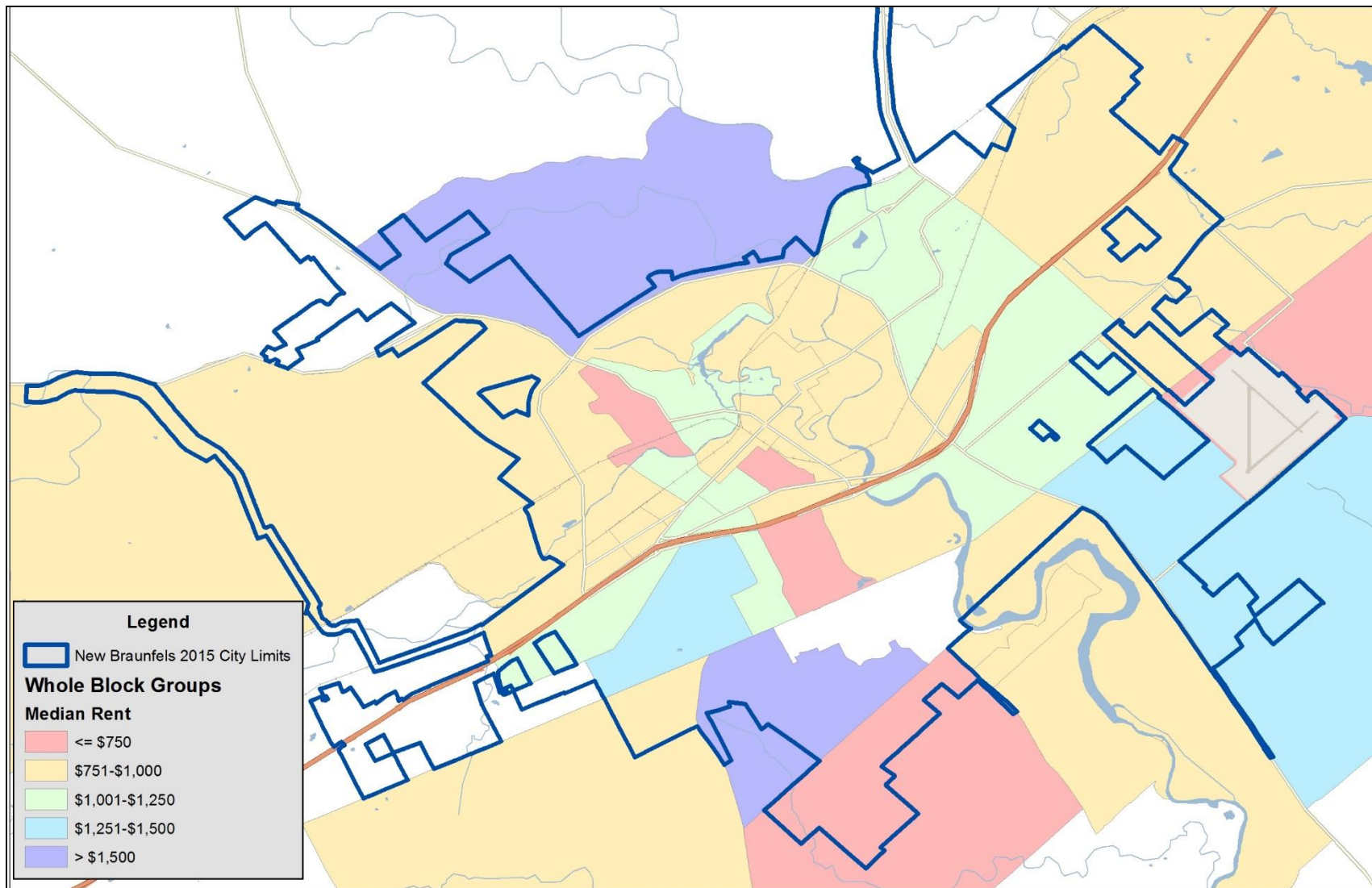
The Fair Market Rents for New Braunfels, as part of the San Antonio-New Braunfels Fair Market Rent Area, have increased between 10.6% and 22.6%, depending on the number of bedrooms, since 2015. The graph below shows the FMRs by the number of bedrooms for 2015, 2016, and 2017 for the San Antonio-New Braunfels area.

Figure 18 – Fair Market Rents by Number of Bedrooms (HUDUSER.gov)



Below is a map of the median rents in New Braunfels.

Map 16 – Median Rents (ACS 2011-2015)



According to the 2016 Out of Reach document (OOR) by the National Low Income Housing Coalition, in 2016, the annual income needed to afford a 2-bedroom rental was \$37,160. The table below shows the incomes as a percent of the Area Median Income

Table 25 – Affordable Rents by Income (2016 OOR)

% of AMI	Income	Affordable Rent	Largest Affordable Unit
120%	\$74,520	\$1,864	4-bedroom or larger
100%	\$62,100	\$1,553	4-bedroom or larger
80%	\$49,680	\$1,242	3-bedroom
50%	\$31,050	\$777	1-bedroom
30%	\$18,630	\$466	None

Using ACS data, the National Low Income Housing Coalition estimated in 2016 the following wage and rental information for the MSA:

Table 26 – Rental Affordability Information (2016 OOR)

	Income	Efficiency	1- bedroom	2- bedroom	3- bedroom	4- bedroom
2016 Fair Market Rents		\$623	\$768	\$964	\$1,273	\$1,529
Income Required for Affordability		\$23,880	\$29,560	\$34,160	\$48,880	\$57,200
Median Household Income	\$62,100					
Median Renter Income	\$36,760					
Median Renter Hourly Wage & Work Hours Required for Affordability	\$17.61	35	44	55	72	87
Mean Renter Income	\$21,872					
Mean Renter Hourly Wage & Work Hours Required for Affordability	\$10.48	44	54	68	90	105
Minimum Wage & Work Hours Required for Affordability	\$7.25	63	78	99	130	152
SSI Income & Rent Affordable on SSI	\$733	\$220	\$220	\$220	\$220	\$220

The average renter in New Braunfels must work overtime or have more than one wage earner in the household to afford a dwelling at fair market rents. The Census Bureau does not provide definitive information on rentals that are affordable to various incomes, but an estimate of the rental mismatch is possible, though not precise. The mismatch is the determination of rental units that are affordable for specific income ranges versus the renters in those income ranges. The table below shows the estimated mismatch for New Braunfels.

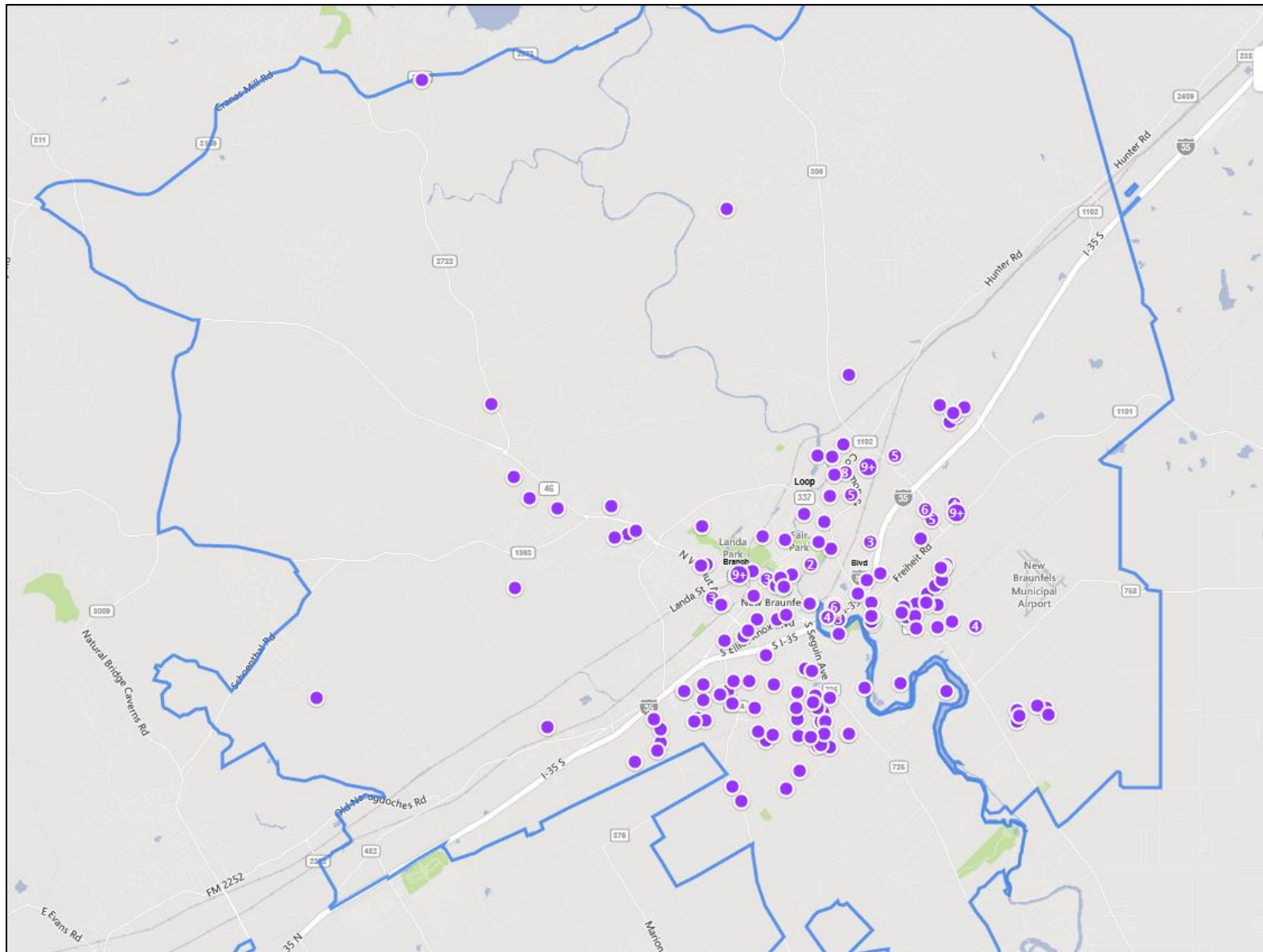
Table 27 – Renter Affordability Mismatch (2011-2015 ACS)

	Rentals	Renters	Deficit/Surplus
Affordable to 30% AMI	730	1,410	(680)
Affordable to 30-50% AMI	1,542	1,190	353
Affordable to 50-80% AMI	4,477	1,950	2,528
Affordable to 80-100% AMI	1,038	1,192	(154)
Affordable to 100-120% AMI	668	596	72
Affordable to > 120% AMI	141	1,179	(1,038)
Total Rentals	8,596	7,516	1,080

Because there are approximately 680 more extremely low-income renters than affordable units, these renters must rent units that are above their means. More could be forced to rent at higher prices if any of the very low- or low/moderate-income renters have rented units affordable to the extremely low-income. Approximately 353 of these 680 or more extremely low-income could possibly rent units affordable to the very low-income, providing higher income renters have not absorbed them. The surplus units affordable to the low/moderate-income must absorb the higher income renters as well as the very low- and extremely low-income.

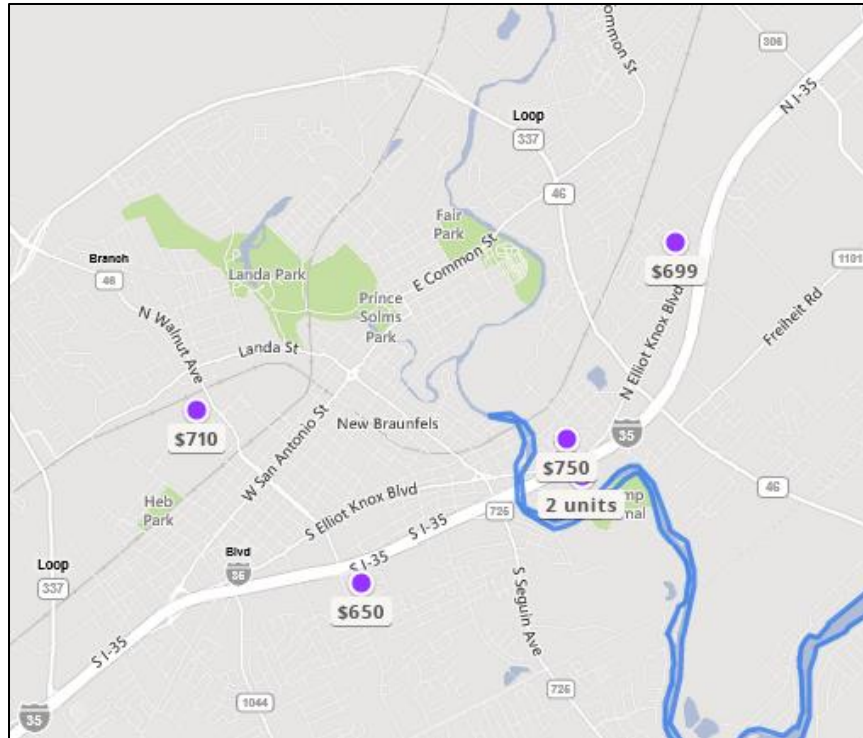
Zillow lists 275 rentals available in February 2017 for the New Braunfels Area. The maps below show the location of rentals – apartments, condominiums, townhouses, and single-family houses – by cost:

Map 17 -- All Rentals on Zillow – February 2017

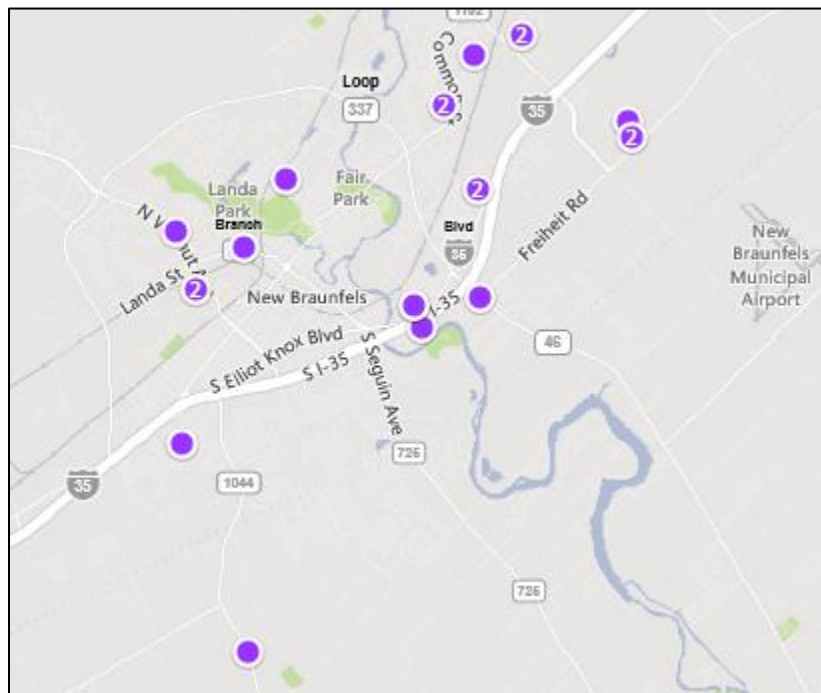


No Rentals < \$500

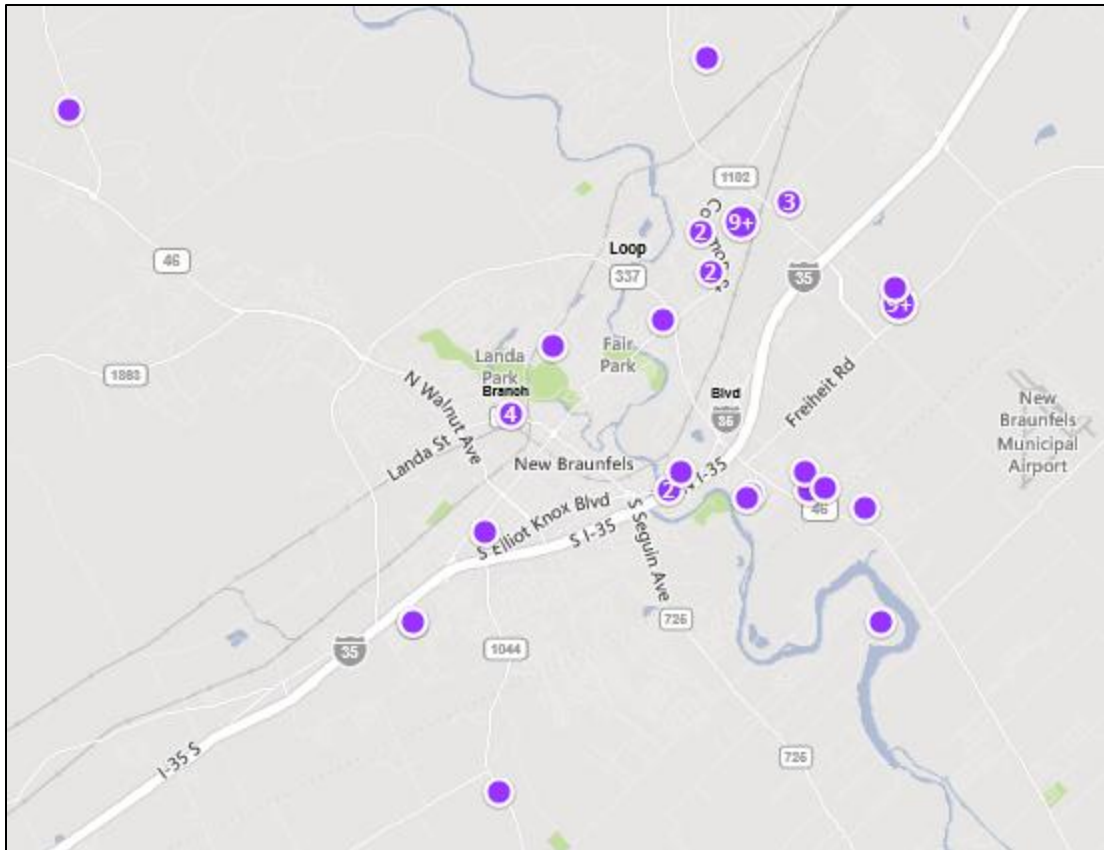
Map 17-a -- Rentals \$500-\$750



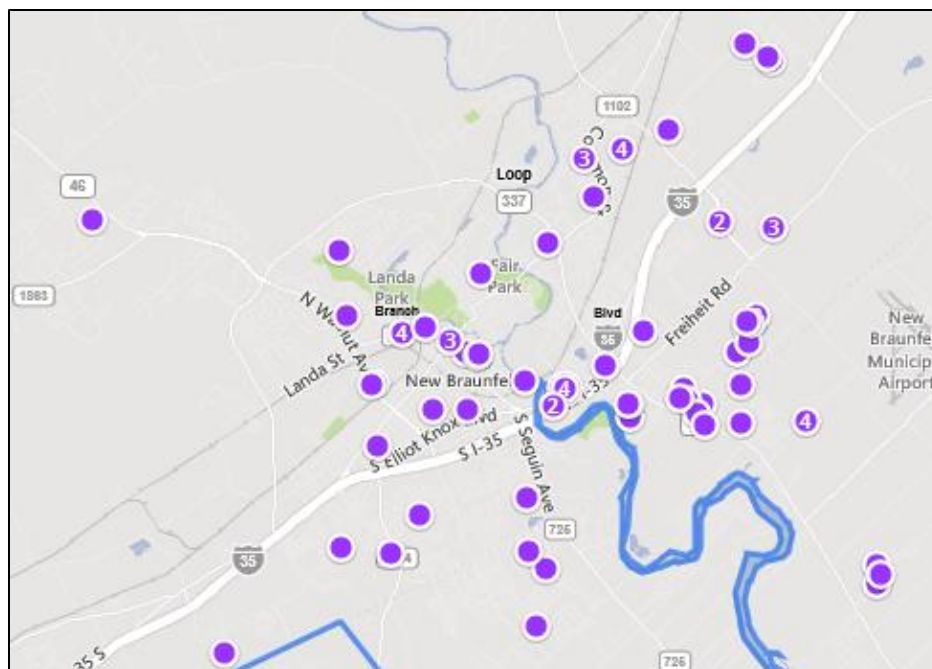
Map 17 -b – Rentals \$751-\$1,000



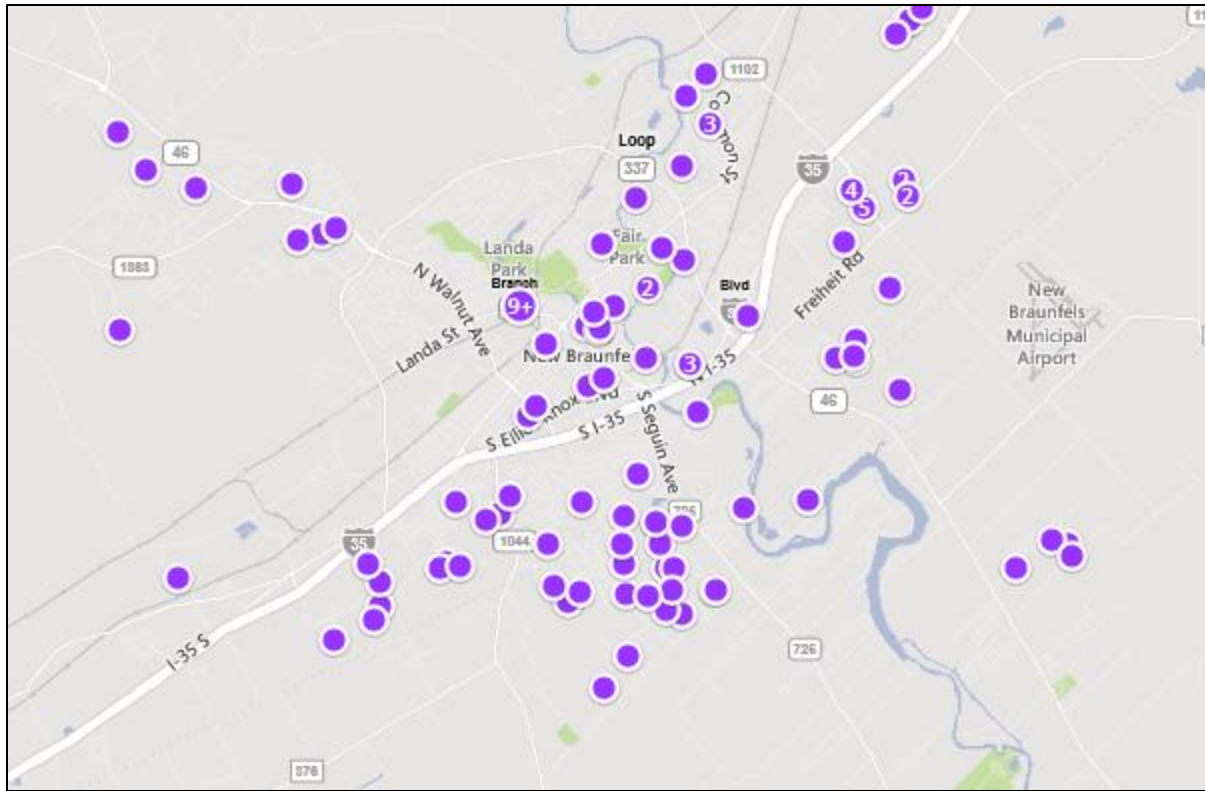
Map 17-c Rentals \$1,001-\$1,250



Map 17-d – Rentals \$1,251-\$1,500



Map 17-3 – Rentals > \$1,500



Based on the information through Zillow, the majority of the rentals in New Braunfels are more than \$1,250 per month, regardless of the number of bedrooms. These are above the area fair market rents for 0-2 bedrooms and require households with the area median income to having wage earners totaling 72 hours a week of paid work.

HUD provides maps and tables concerning the publicly supported housing. The next map shows the location of the publicly supported properties as well as the percent of voucher units by census tract. As can be seen on the map, the census tract where four of the six properties are in the northwest census tract, which also has the highest percent of voucher units within New Braunfels tracts (3.89%-7.64%). Following the map is a table of the households by type of housing assistance and the disabled by type of housing assistance.

Map 18 – Publicly Supported Housing Properties and Percent of Voucher Units by Census Tract (AFFH-T)

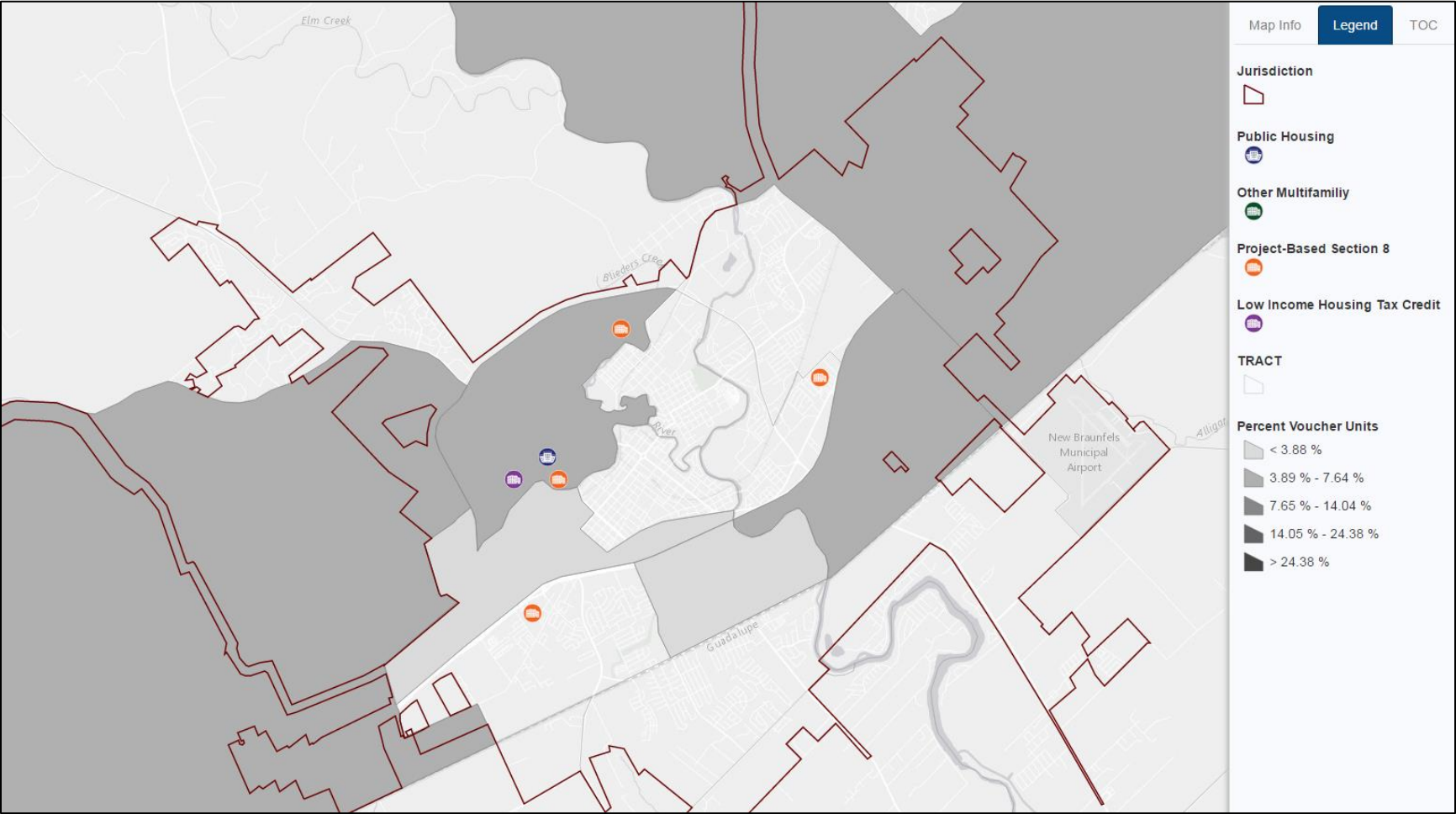


Table 28 – Households in Publicly Supported Housing by Program and Bedrooms (AFFH-T)

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	100	58.82%	30	17.65%	40	23.53%	62	36.47%
Project-Based Section 8	143	61.11%	55	23.50%	35	14.96%	74	31.62%
Other Multifamily	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
HCV Program	91	45.96%	83	41.92%	14	7.07%	40	20.20%

According to Apartments.com, there are six apartments advertised as wheelchair accessible. The map below shows their locations of those listed through Apartments.com. RentaHouses.com lists another four complexes ranging from \$850 to \$2,905. The table below shows the 2,443 disabled persons 16 years and older by income and affordable rents; followed by a table of the publicly supported units for disabled households. A map of the location of the six properties with rents charged follows the table.

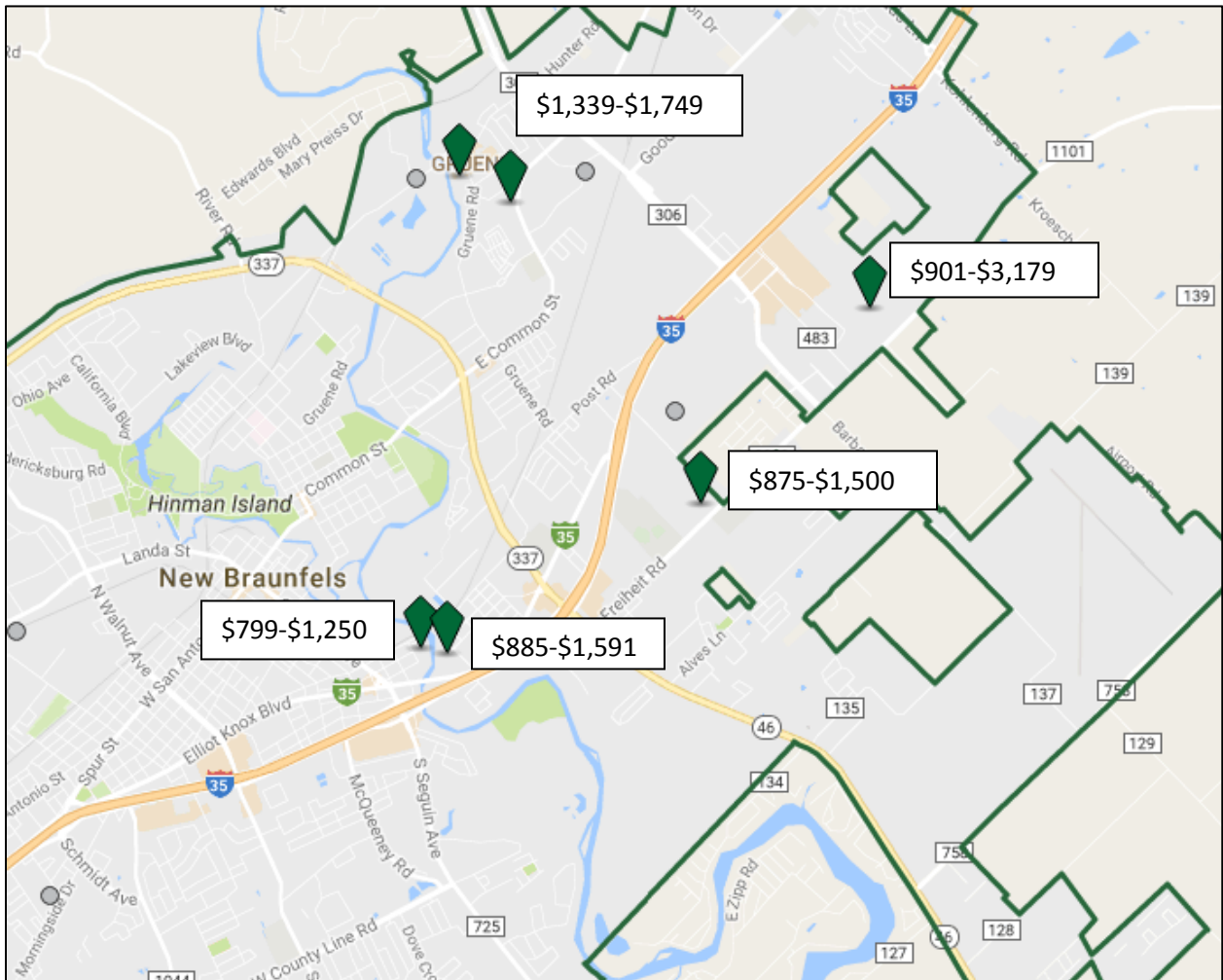
Table 29 – Disabled Persons 16 Years & Older by Income and Affordable Rent (2011-2015 ACS)

Income Range	Disabled Persons 16+ Years	Affordable Rent for Income
30% AMI	913	\$466.00
50% AMI	528	\$777.00
80% AMI	593	\$1,242.00
100% AMI	158	\$1,553.00
120% AMI	156	\$1,864.00
Above	95	

Table 30 – Disability by Publicly Supported Housing (AFFH-T)

Housing Type	People with a Disability	
	#	%
Public Housing	27	15.88%
Project-Based Section 8	29	12.39%
Other Multifamily	N/a	N/a
HCV Program	58	29.29%

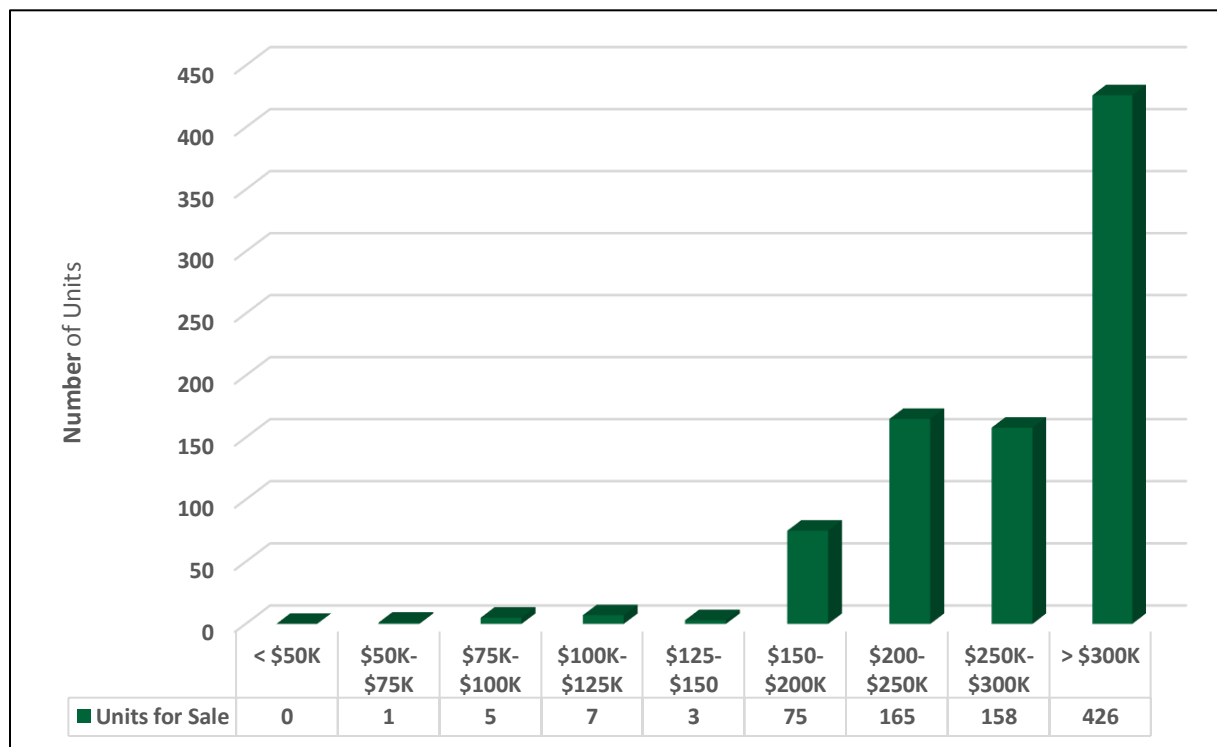
Map 19 – Apartments Advertised as Wheelchair Accessible (Apartments.com)



Owner Market

In February 2017, Zillow.com listed 840 units for sale, 516 by agent, 301 new construction, 4 foreclosures, and 17 by owner. An additional 19 are potential listings for foreclosures and pre-foreclosures. There were 5,573 recently sold units. The graph below shows the number of units by price, with a series of maps of the location of the properties for sale following.

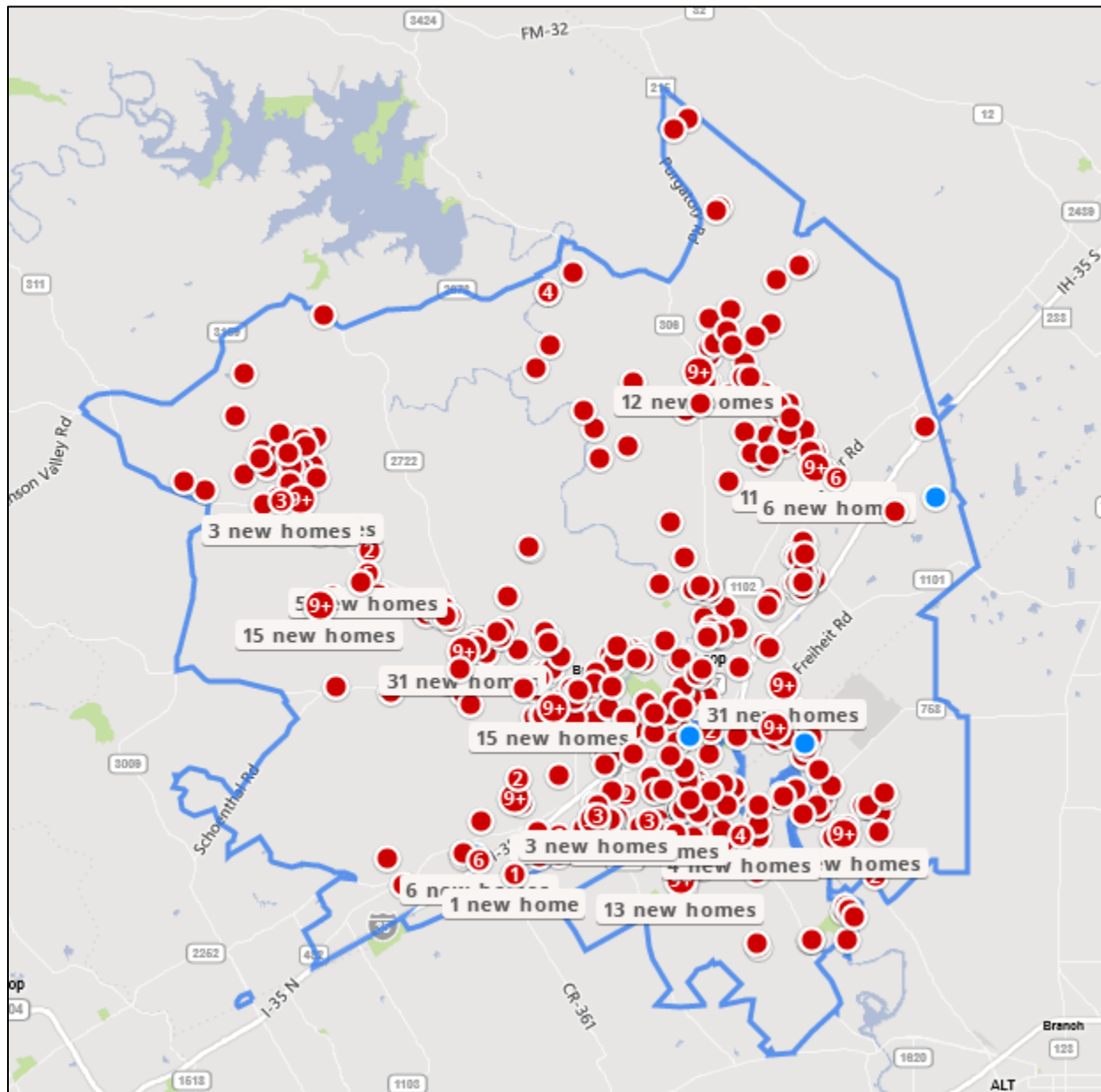
Figure xx – Units for Sale by Asking Price (Zillow.com)



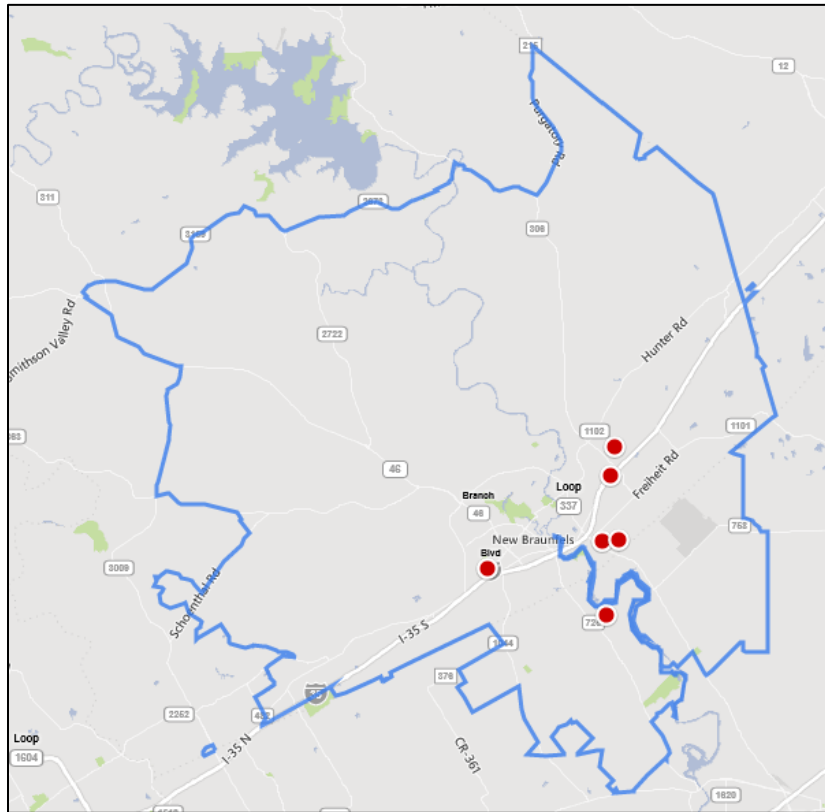
Depending on the down payment, closing costs, interest rates, utilities and insurance costs, most extremely low-income renters are not able to afford to purchase a house in New Braunfels, with a \$100,000 home likely to cost \$500/month before utilities, taxes, and insurance. An extremely low-income household can only afford \$473 total per month without having a housing cost burden of 30% or more. Very low-income households with good credit and employment histories, at least 20% down payment, and cash for closing costs could probably afford one of the 6 homes priced below \$100,000. Low/moderate-income households could probably afford one of the 7 homes priced between \$100,000 and \$125,000 ranging from \$75,000 to \$125,000. A household earning between 80% and 120% of the median income could probably afford one of the 78 homes priced between \$125,000 and \$200,000. The 749 (89%) of the homes over \$200,000 are affordable only to those earning more than \$75,000 per year, assuming good credit and employment histories, no foreclosures, and low utility, taxes and insurance costs. No

definitive data exist for income by tenure and race/ethnicity, but computing based on racial/ethnicity distribution for each income range applied to renter incomes it can be estimating that there are 2,295 whites, 81 African Americans, 578 Hispanics, and 13 Asians who are renters with incomes of \$75,000 or more, making them potentially able to qualify for 89% of the available units for sale.

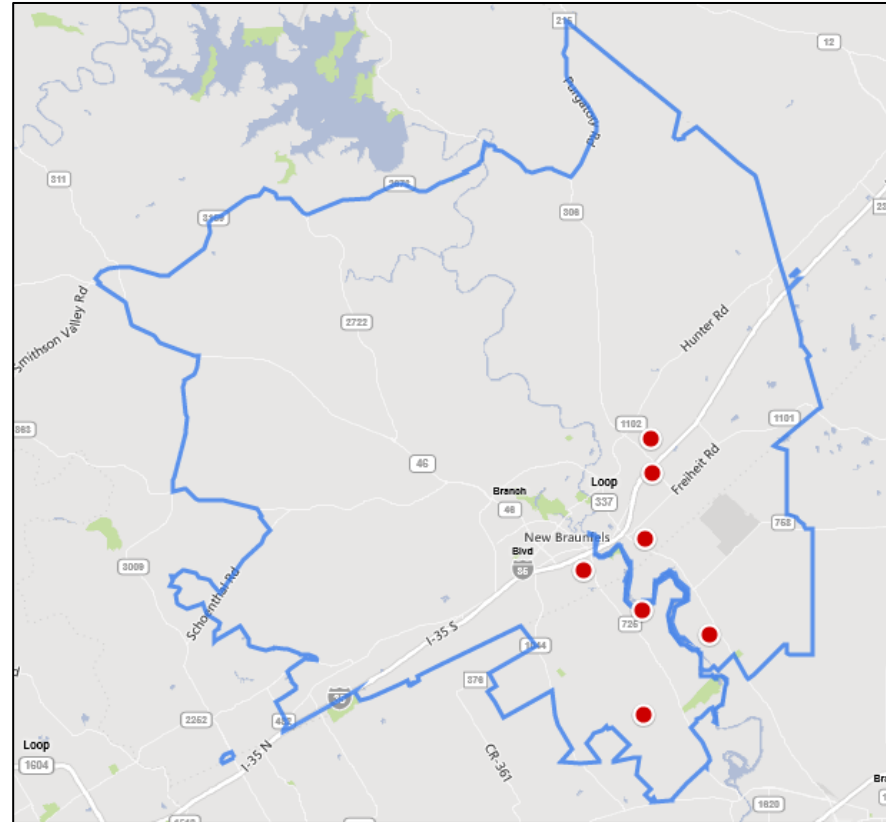
Map 20 – For Sale Units (February 2017 on Zillow.com)



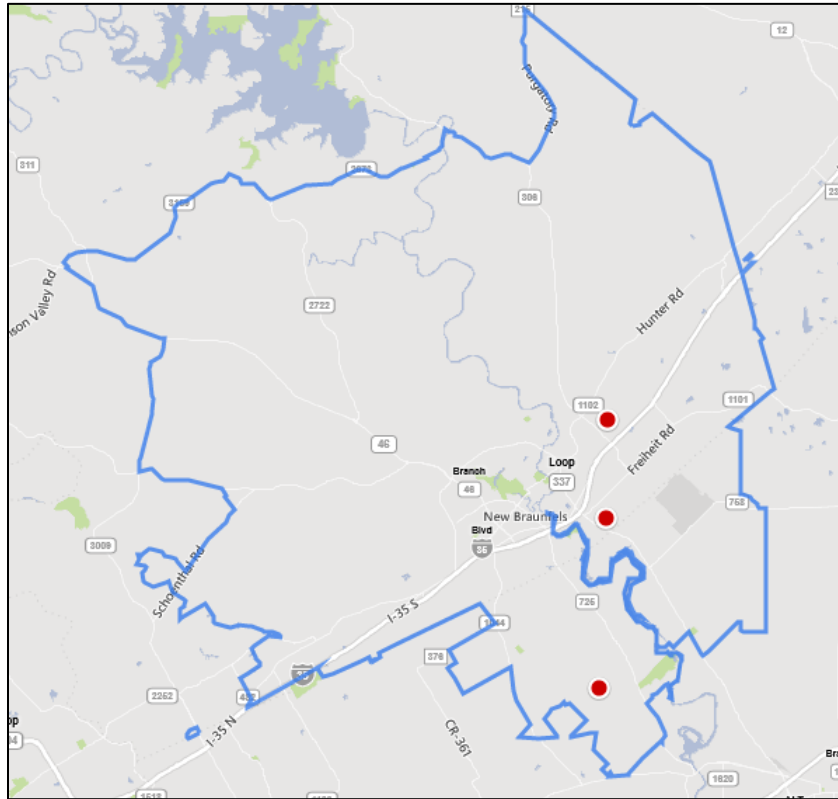
Map 20-a – For Sale Units Priced < \$100,000



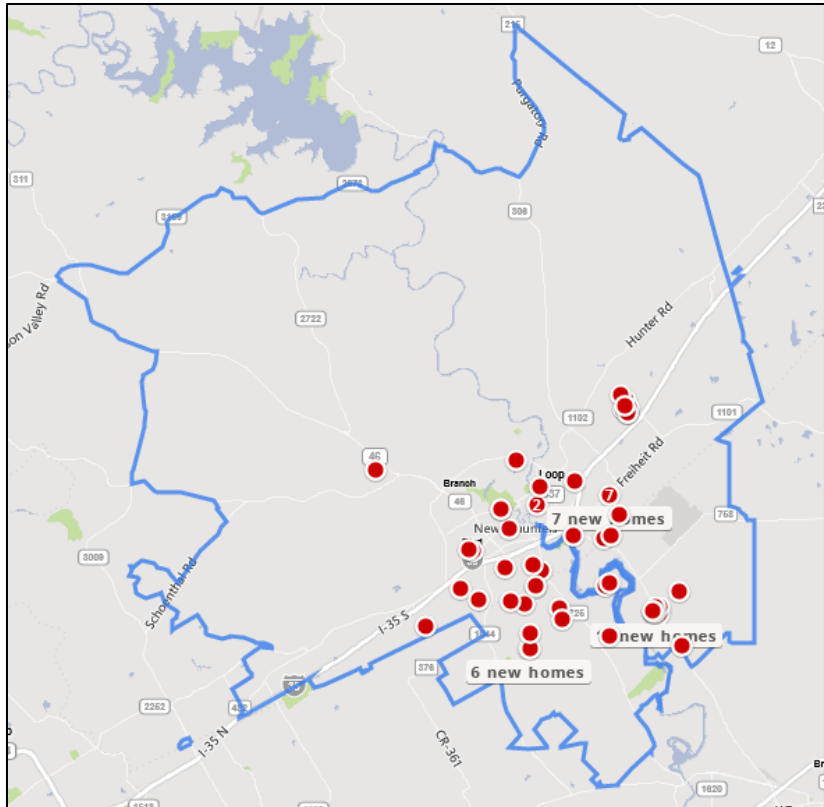
Map 20-b – For Sale Units Priced \$100,000 - \$124,999



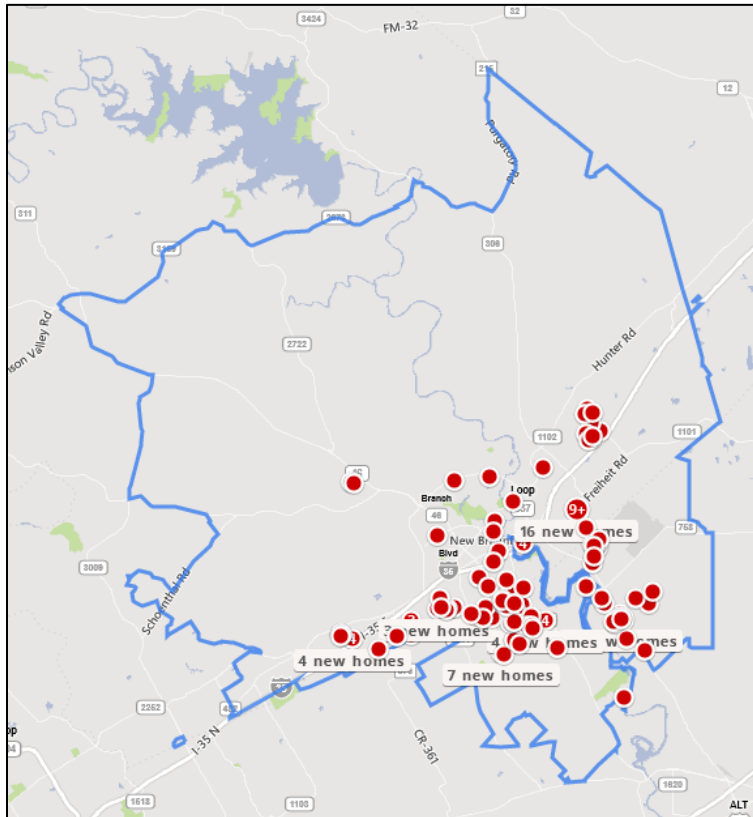
Map 20-c – For Sale Units \$125,000-\$149,999



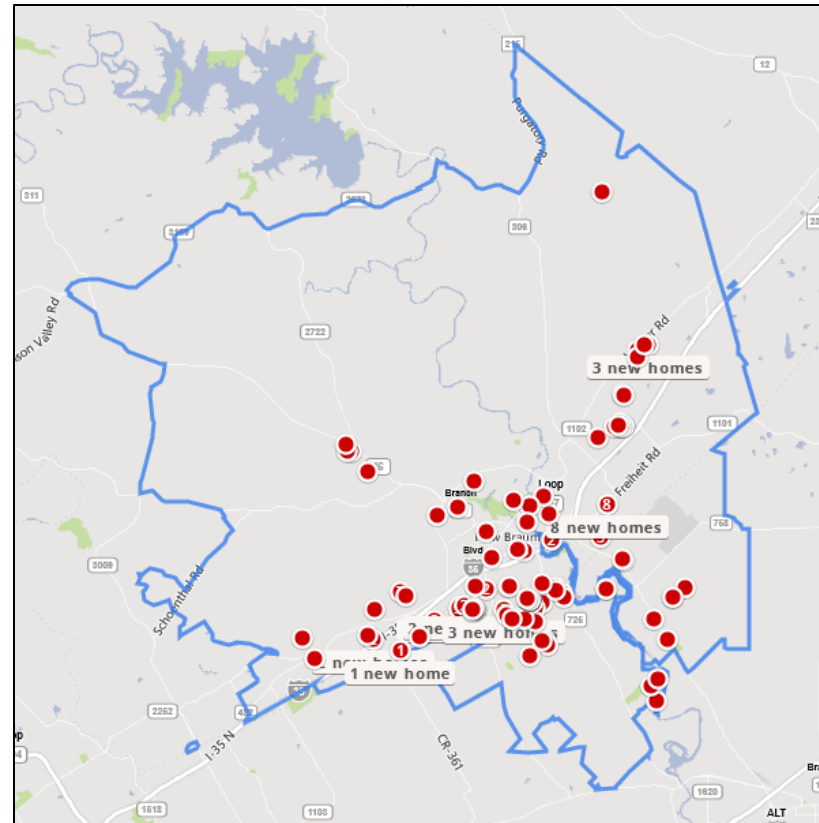
Map 20-d – For Sale Units \$150,000-\$199,999



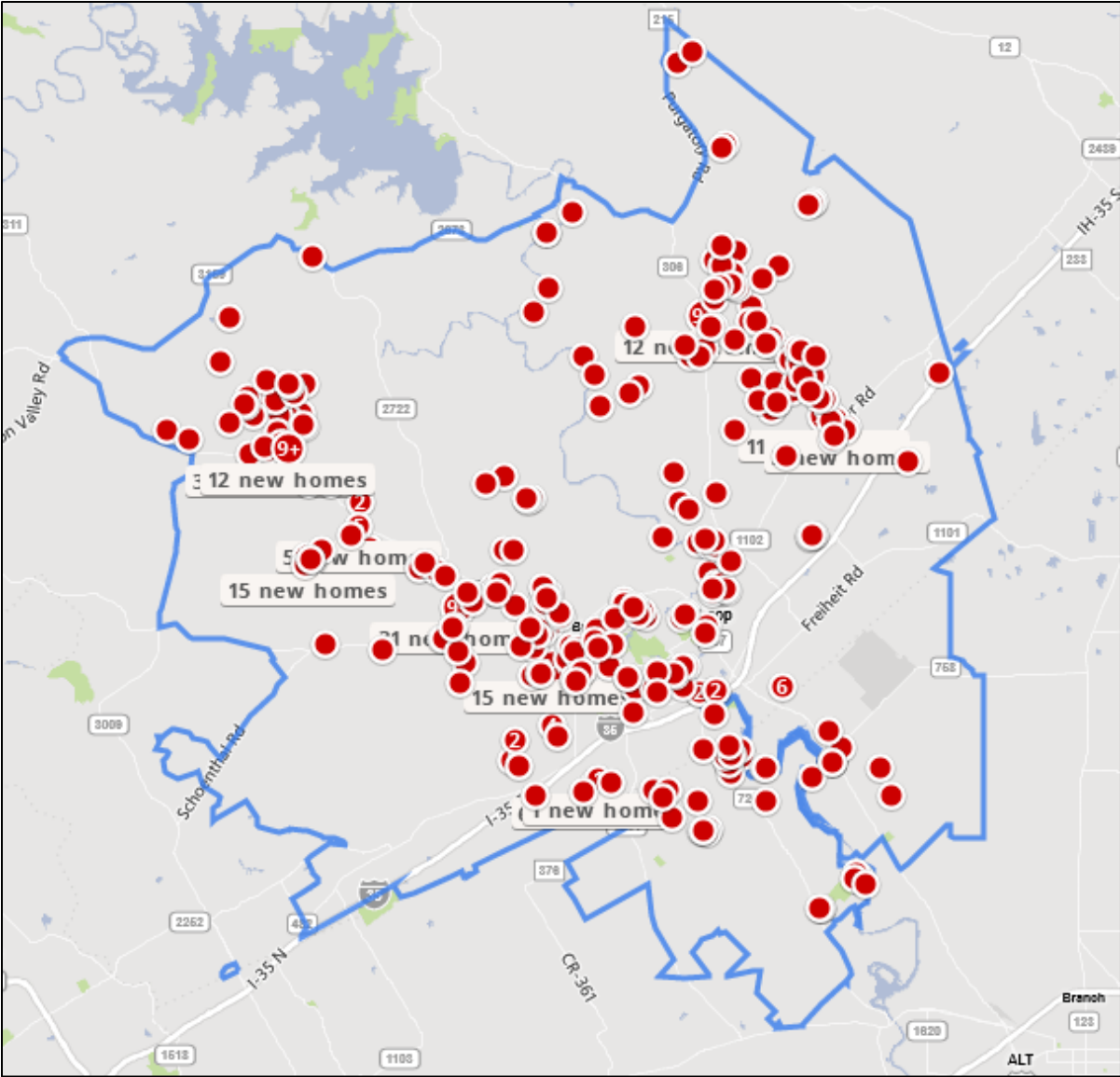
Map 20-e – For Sale Units \$200,000-\$249,999



Map 20-f – For Sale Units \$250,000-\$299,999



Map 20-g – For Sale Units \$300,000+



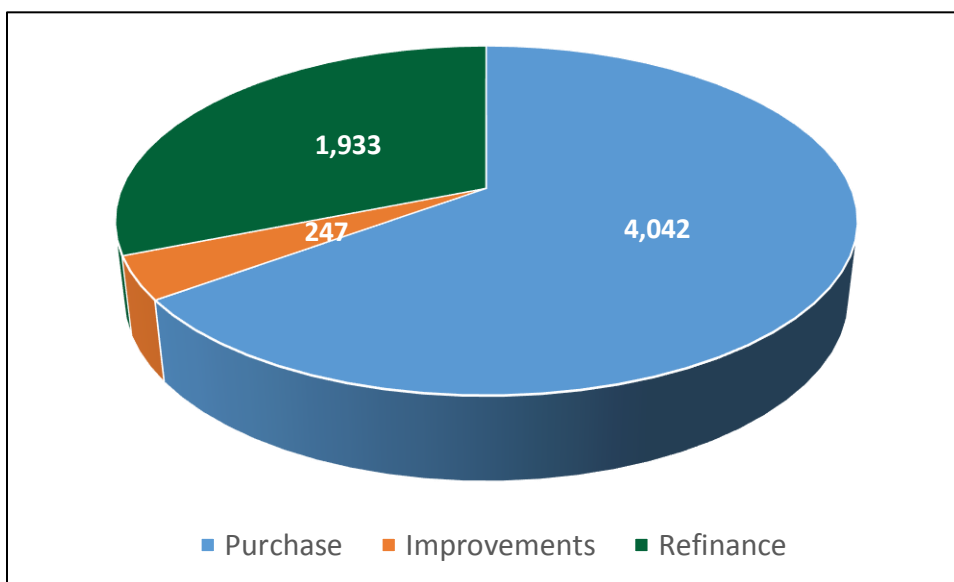
Home Mortgage Disclosure Act Data Analysis

Area-wide Data

The Home Mortgage Disclosure Act (HMDA) data provides information for every mortgage application by year, MSA, county and/or census tract. For the Fair Housing Plan, the 2015 census tract data for whole tracts at least partially within New Braunfels have been selected and analyzed. The census tract data have been aggregated to the represent totals for New Braunfels and the immediate surrounding area. Of the applications included, 96% were for single family dwellings (1-4 units) and 4% for manufactured housing. No applications were for condominiums or townhouses.

The database includes all residential applications regardless of the expected tenure (owner occupancy or for rental purposes) and regardless of completeness of applicant information. As a result, for analysis purposes, only the applications for owner occupancy have been selected and for most of the analyses, only the applications for which household income has been included have been selected. There were a total of 8,314 applications, with 7,634 being for owner occupancy and 6,222 of the owner occupancy applications having income information provided. Though the distribution of the reasons for the loans was consistent for all applications, just owner occupancy applications and those with incomes have been analyzed. The graph below shows the distribution of loan purposes for those owner occupancy applications which included income:

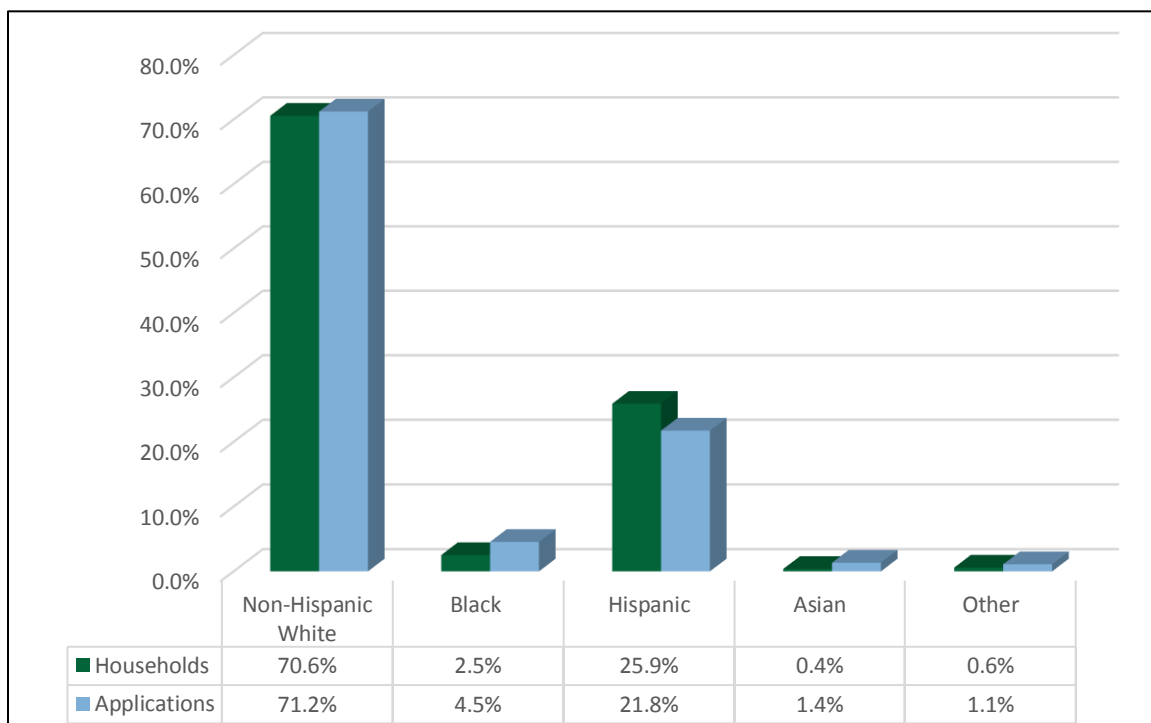
Figure 20 – Purpose of Owner Occupancy Applications with Income Given



Applications for non-Hispanic Whites represent a slightly higher percentage of their counterpart area households, with 70.6% of the households (from the 2011-2015 ACS estimates) being

headed by non-Hispanic Whites and 71.2% of the applications being non-Hispanic White. Likewise, Asians have a slightly higher proportion of applications than their proportion of total households. African Americans also have a higher proportion of applications than total households while Hispanics have a lower proportion of applications than of the total households. The graph below shows the distribution race/ethnicities for total households and applicant households applying for owner occupied housing and providing income data:

Figure 21 – Percent of Total Households and Mortgage Applications by Race/Ethnicity

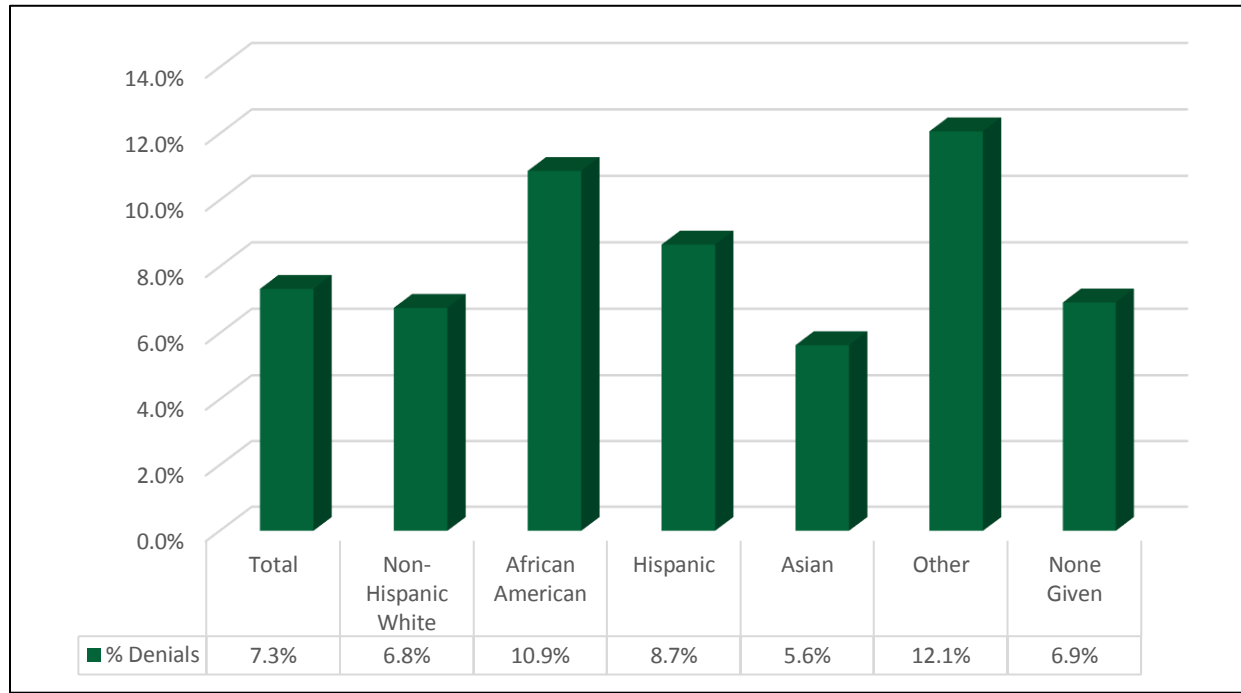


Of the owner occupied applications with income information provided, 4,120 primary applicants were male and 1,427 were female with 675 applications missing gender information. Of the male applicants, 1,585 (38.5%) had no co-applicant. Of the female applicants, 61.8% had no co-applicant. Of those applications with gender information provided, 102 were from same sex couples. The denial rates were very similar for single males, single females, same-sex couples and opposite sex couples, indicating no gender bias in approving applications. One major limitation to the database is the lack of information regarding disability status. As a result, no inferences can be made about the equitable treatment of mortgage applicants who are disabled. Likewise, no information is provided for the size of the households or the relationships within households.

When comparing application denial rates within each racial/ethnic group, African Americans and Others (including multi-racial groups) have a significantly higher rate of denials than non-Hispanic Whites or the total applicant pool. Hispanics have a somewhat higher rate of denials than non-

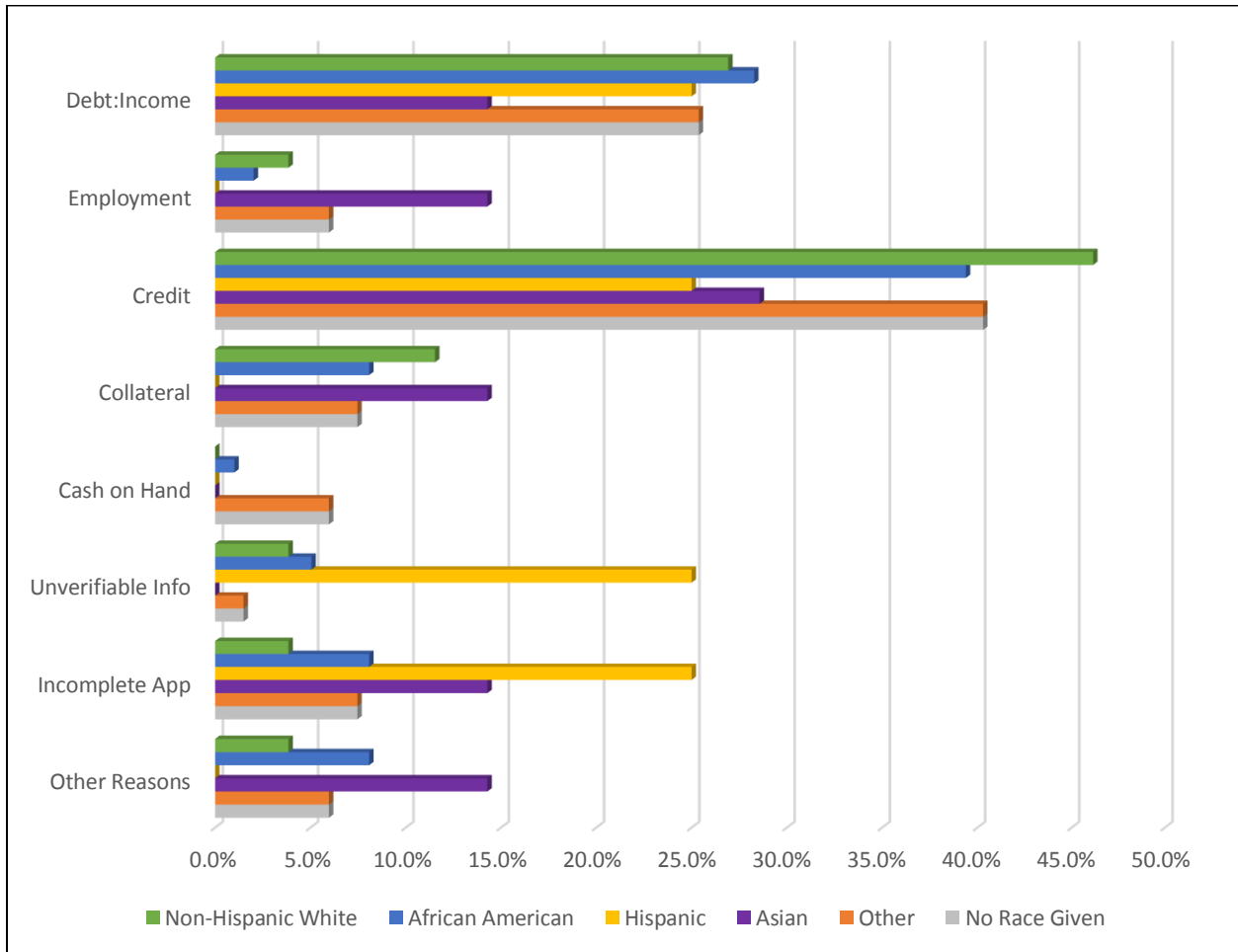
Hispanic Whites. The graph below shows a comparison of denials within each racial/ethnic group:

Figure 22 – Percent of Applications Denied by Racial/Ethnic Group



Across the board, debt-to-income ratio and credit history are by far the most prevalent main reasons for application denials. However, Asians have a higher than average rate of denials due to employment history, collateral and for “other” undefined reasons. Hispanics have a much higher rate of denials for unverifiable information and incomplete applications. The graph below shows a comparison of racial/ethnic groups for each primary denial reason given by the lending institution:

Figure 23 – Percent of Applications Denied by Race/Ethnicity and Primary Reason for Denial



The high rate of denials of Hispanic and Asian applications for incompleteness could be due to a lack of assistance to any English as a second language applicants by the lending institution for completing the application correctly. If that is the case, it would constitute discrimination. The high rate of denials of Hispanic applications for unverifiable information is often caused by an inability to easily contact employers, local neighborhood banks, and neighborhood retailers providing in-house credit. Hispanics have a higher rate of being employed by small local businesses and using neighborhood family-owned banks and retailers, including used car dealers. Often, unless the lender makes some phone calls, the information will be unverifiable, as it is not accessible on line. Not using non-electronic means to verify the information can constitute discrimination. “Other reasons” is often a catch phrase for hidden, covert discrimination.

Historically verified reason for lenders checking the “other reason” box is discrimination based on race/ethnicity, gender or sexual orientation, household/family composition, and age. Another red flag regarding discrimination is to accept (and perhaps encourage) applications from minorities without a race/ethnicity or age designated. “Other” can also be tied to the location of the prospective house. Redlining still occurs in areas throughout the country and lenders may be hiding the practice of refusing to lend to persons of color, certain disabilities, or family composition based on the neighborhood in which they are seeking to purchase a home. Additionally, As can be seen, “other” and “no race given” have the same rate of denials across the board, which should alert to the possibility of lenders disguising the reasons for the denial by spreading them equally across the two options.

With 315 different lenders represented it is difficult to determine any systemic discrimination, particularly because many of the lenders received less than 5 total applications. However, 14 institutions with 10 applicants or more had a higher-than-average denial rate, particularly for minorities. The table below shows the total rate of denial and the rate for African American and Hispanic applicants where either minority group had more than 1 application. There are too few Asian and other minority groups from which to draw any conclusions.

Table 31 – Institutions with Higher than Average Denial Rates and High Minority Denial Rates (Ranked by Number of Applicants)

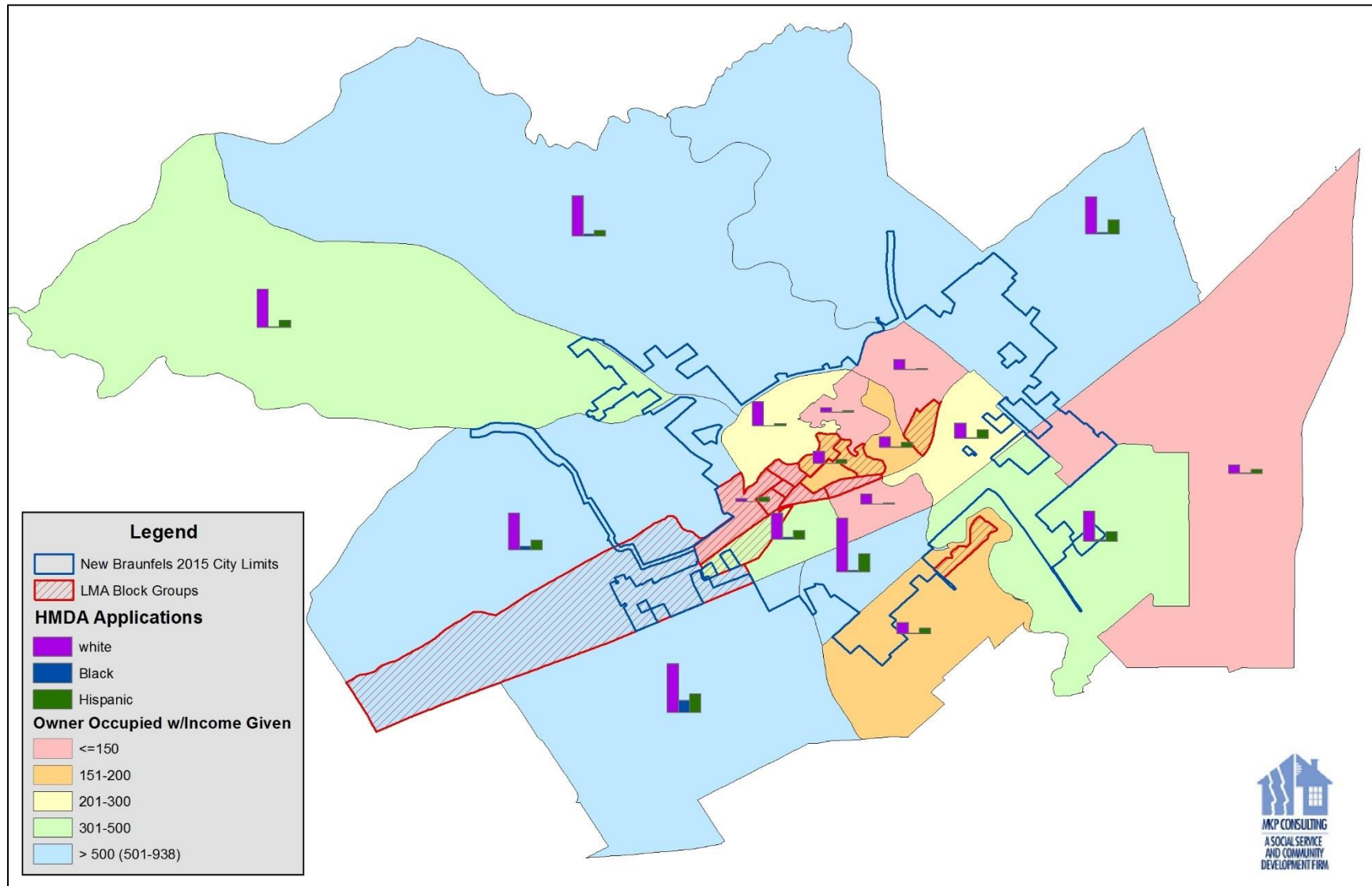
Institution	Total Applications	% Denials	% African Americans Denied*	% Hispanics Denied*
Wells Fargo	481	15.4%	40.0%	26.9%
Quicken Loans	197	21.3%	40.0%	31.6%
JP Morgan Chase	89	12.4%		30.0%
Guild Mortgage Co.	79	29.1%	33.3%	40.7%
Ditech Financial	51	29.4%		40.0%
Prosperity Bank	47	21.3%	100.0%	40.0%
Frost bank	40	42.5%	100.0%	50.0%
RMC Mortgage Corp	29	17.2%	25.0%	33.3%
Suntrust Bank	25	64.0%	100.0%	
Network Capital Funding	23	26.1%		50.0%
Franklin American Mortgage	15	13.3%		25.0%
Bay Equity	14	14.3%	66.7%	
Admirals Bank	12	58.3%	100.0%	
First community Bank TX	10	40.0%	100.0%	50.0%

** Blanks indicate institutions with only 1 applicant from the particular minority group*

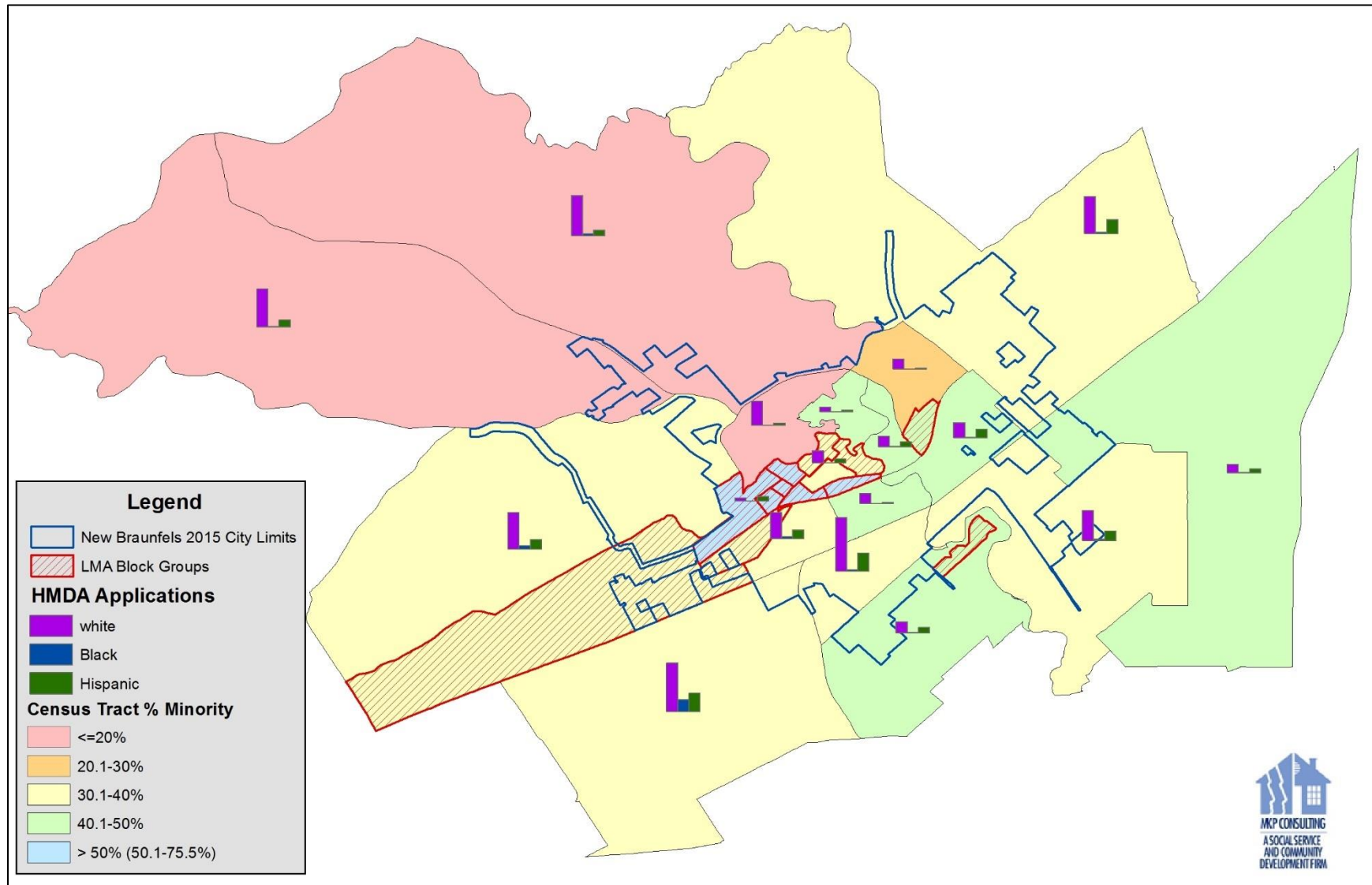
Census Tract Data

HMDA attaches census tract numbers to each application so that the records can be aggregated by subarea in order to determine any potential locational bias and discrimination. Below are a series of maps showing variables at the census tract level. All of the variables are for applications for owner occupied housing where income has been provided by the applicant.

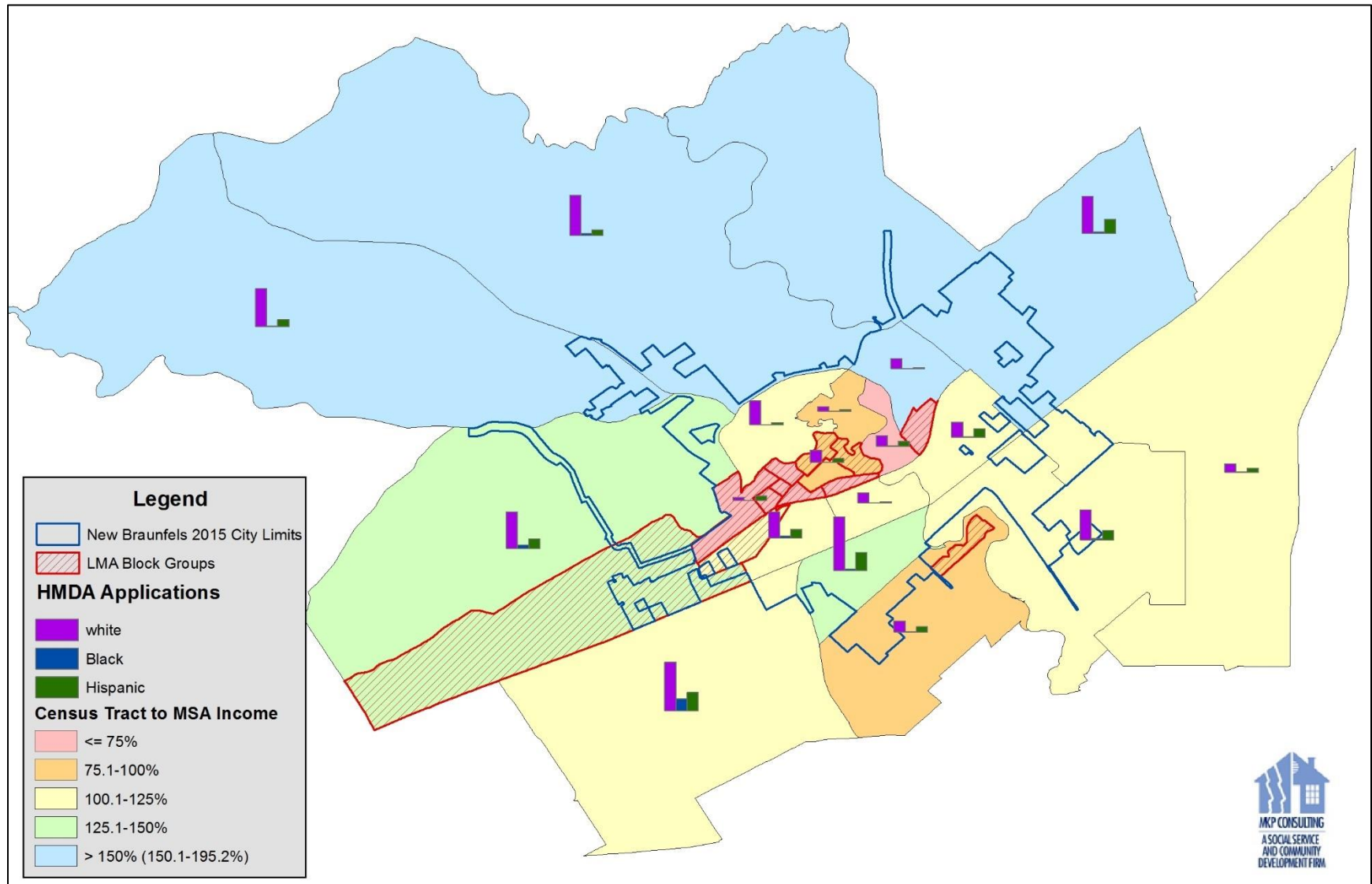
Map 21 – Applicant Race/Ethnicity over Owner Occupied Applications for which Income Given



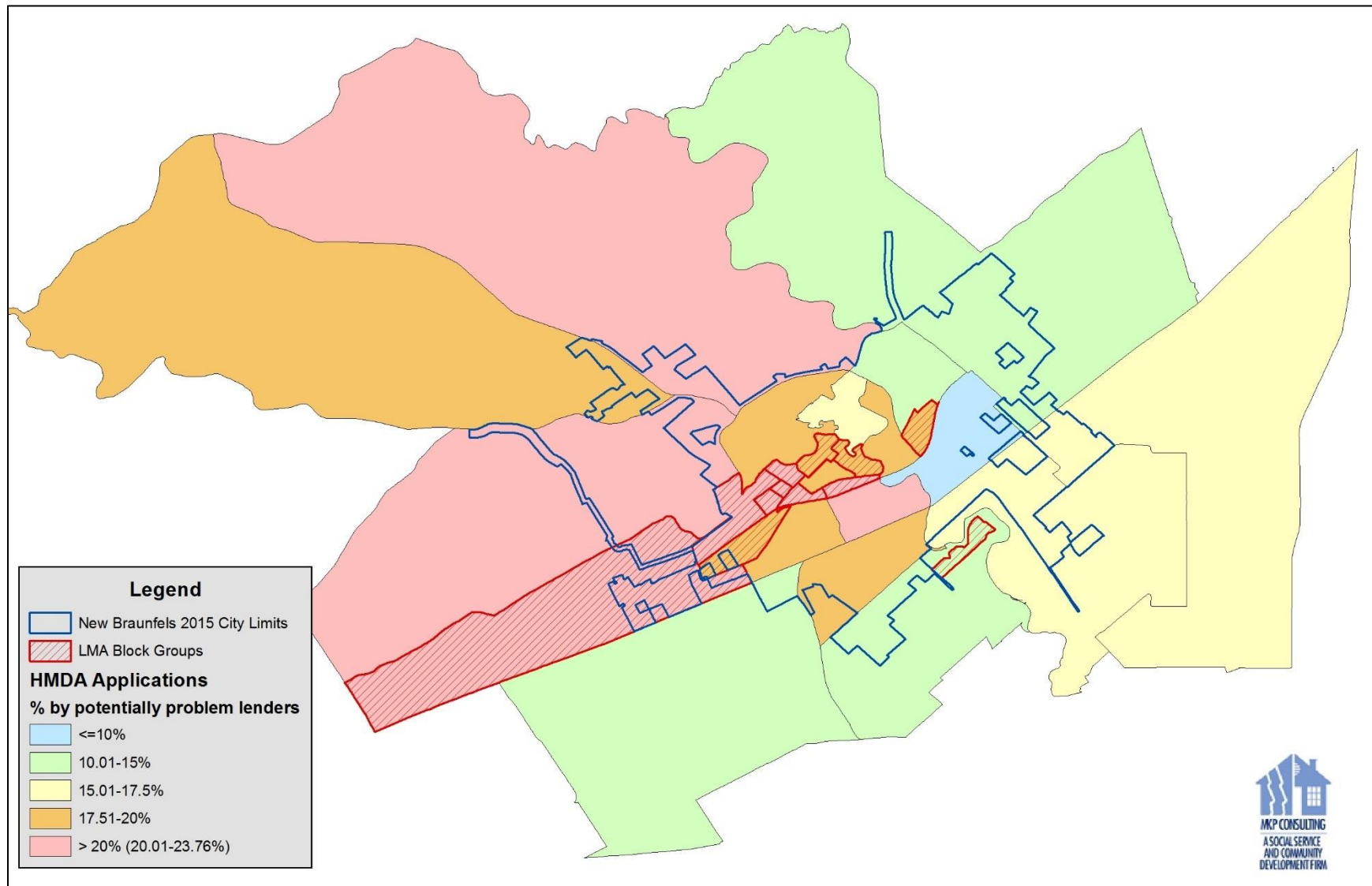
Map 22 – Applicant Race/Ethnicity over Census Tract's Percent Minority Population



Map 22 – Applicant Race/Ethnicity over Ratio of Census Tract to MSA Median Family Income



Map 24 – Applications Served by Potentially Problematic Lenders to Total Applications by Census Tract



Map 25 – Percent of Applications Denied

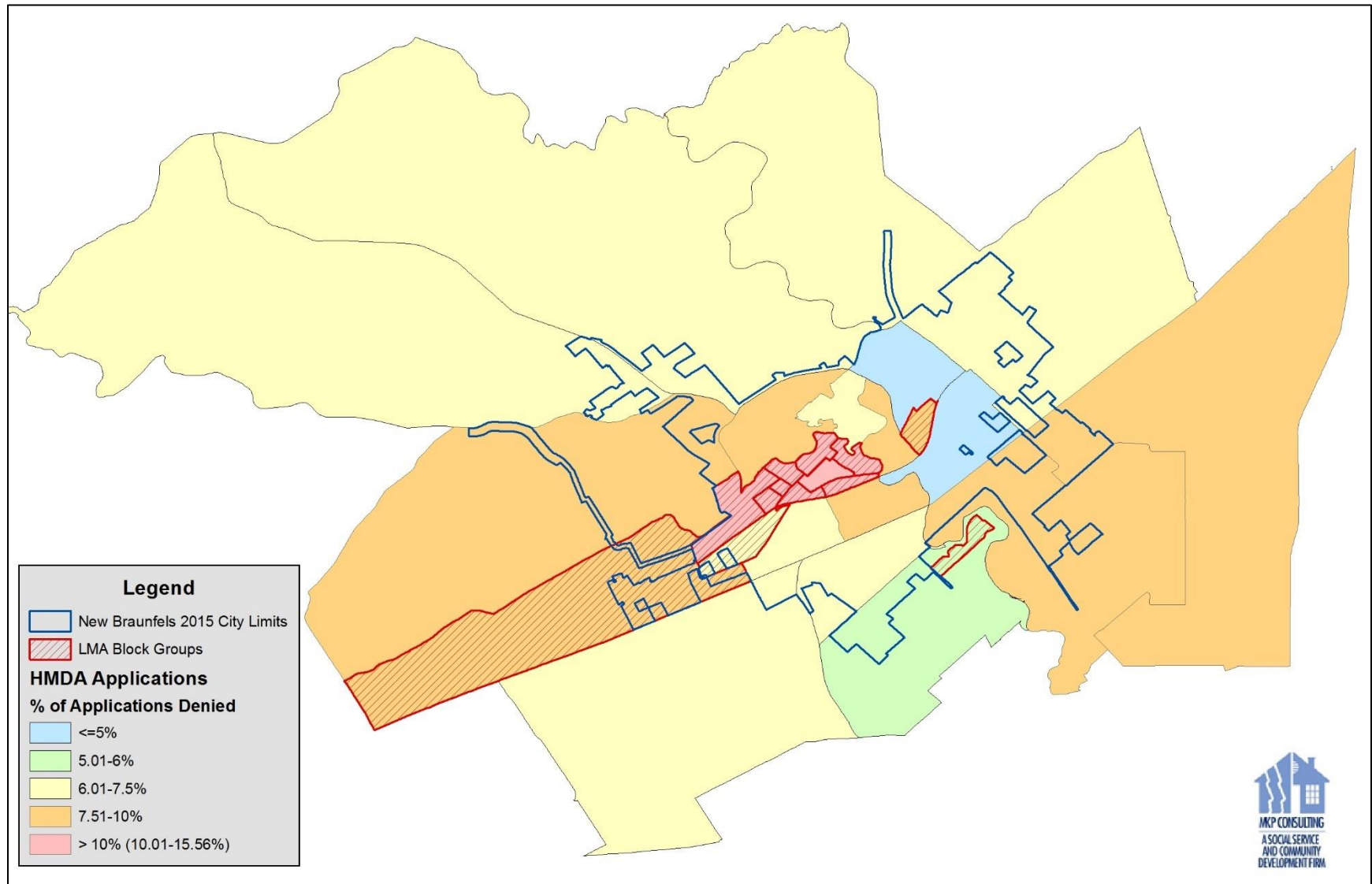
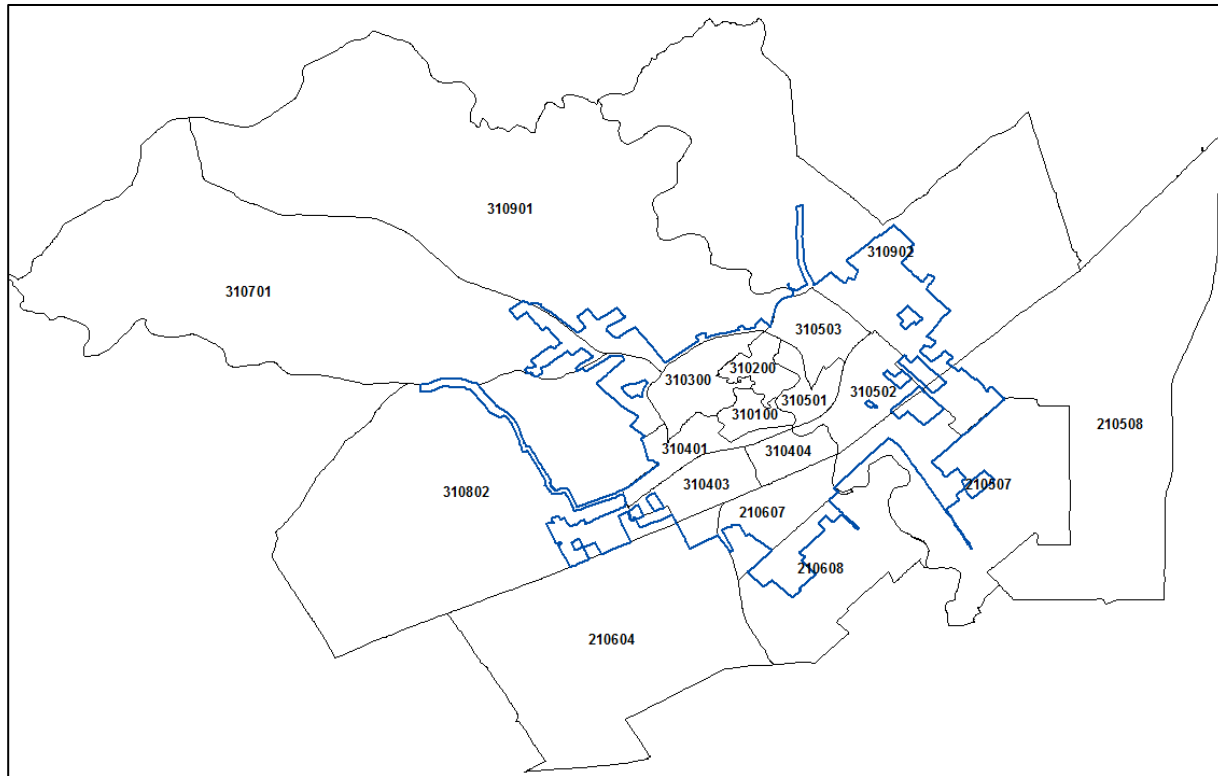


Table 32 – HMDA Data Applications for Home Purchase by Census Tract



Census Tract	Purchase Apps	Tract % Minority	% Minority Apps	% Denied	Average App Income	Average App:CT Income	Average Loan Amt	Average Loan: Income
310100	97	38.08	21.78	4.12	\$ 98,814	1.56	\$ 193,639	2.30
310200	32	49.15	21.88	0.00	\$ 102,875	1.62	\$ 197,719	2.77
310300	133	19.23	10.92	7.52	\$ 133,391	2.10	\$ 239,699	2.50
310401	40	75.49	62.50	10.00	\$ 73,625	1.16	\$ 160,300	2.39
310403	262	37.31	22.03	5.73	\$ 81,061	1.28	\$ 207,515	2.86
310404	65	43.47	19.53	7.69	\$ 72,923	1.15	\$ 160,031	2.54
310501	111	49.43	31.00	5.41	\$ 85,009	1.34	\$ 172,991	2.11
310502	201	45.37	35.07	3.48	\$ 71,488	1.13	\$ 156,507	2.25
310503	56	27.12	10.33	1.79	\$ 120,446	1.90	\$ 226,304	2.37
310701	253	17.16	12.47	3.56	\$ 133,885	2.11	\$ 283,419	2.46
310802	360	35.78	27.33	6.39	\$ 108,558	1.71	\$ 263,972	2.81
310901	298	13.34	20.82	7.05	\$ 126,899	2.00	\$ 317,295	3.46
310902	393	30.77	27.37	3.56	\$ 90,656	1.43	\$ 197,875	2.49
210507	254	35.57	22.74	2.76	\$ 80,646	1.27	\$ 199,146	2.93
210508	83	46.77	33.52	4.82	\$ 83,253	1.31	\$ 188,446	2.46
210604	744	38.59	30.52	4.03	\$ 92,016	1.45	\$ 233,452	2.77
210607	544	32.07	23.77	3.31	\$ 81,423	1.28	\$ 196,456	2.75
210608	116	49.51	34.48	0.00	\$ 72,216	1.14	\$ 185,500	2.73

There are too few African American and Asian applications to draw any conclusions regarding the equitable geographic distribution of the applications by race/ethnicity. In every census tract except 310901 the percent of minority applications was considerably less than the percent of the total minority population in the tract. Because a few census tracts do have some measurable African American applications, they are included in the graphs within the maps.

The majority of the applications were for houses outside Loop 337, both due to the larger geographic size of those census tracts, and the new developments and more available housing. The fewest applications were for areas inside the city that are CDBG low-moderate income areas. Though the numbers are small, the white-to-Hispanic ratio is much closer to equal in the lower-income inner city areas. Too few African Americans applied for loans overall for their numbers to appear on the census-level bar graphs in the maps. There is no way to tell if the Hispanics applied at a lower rate in the more suburban areas because the houses were too expensive, they knew they would not be as welcome or likely to be approved, or they wanted to be in a community of Hispanic-based amenities.

The areas with the highest rate of applicants served by potentially problem lenders to total applications are primarily in the central city and the north/northwest part of the area. Because the data are only available at the census tract level, and the tracts outside of Loop 337 are geographically very large, it is not possible to determine if the higher rates of potentially problem lenders are inside the city or in the unincorporated areas of Comal County. However, it does raise concerns regarding targeting and subprime lending. Additionally, the highest rates of denials are in the same census tracts, particularly inside Loop 337 and to the west, including all of the CDBG low-moderate income areas. The tracts with the mid-range percent of denials are the tracts with the highest loan: income ratio.

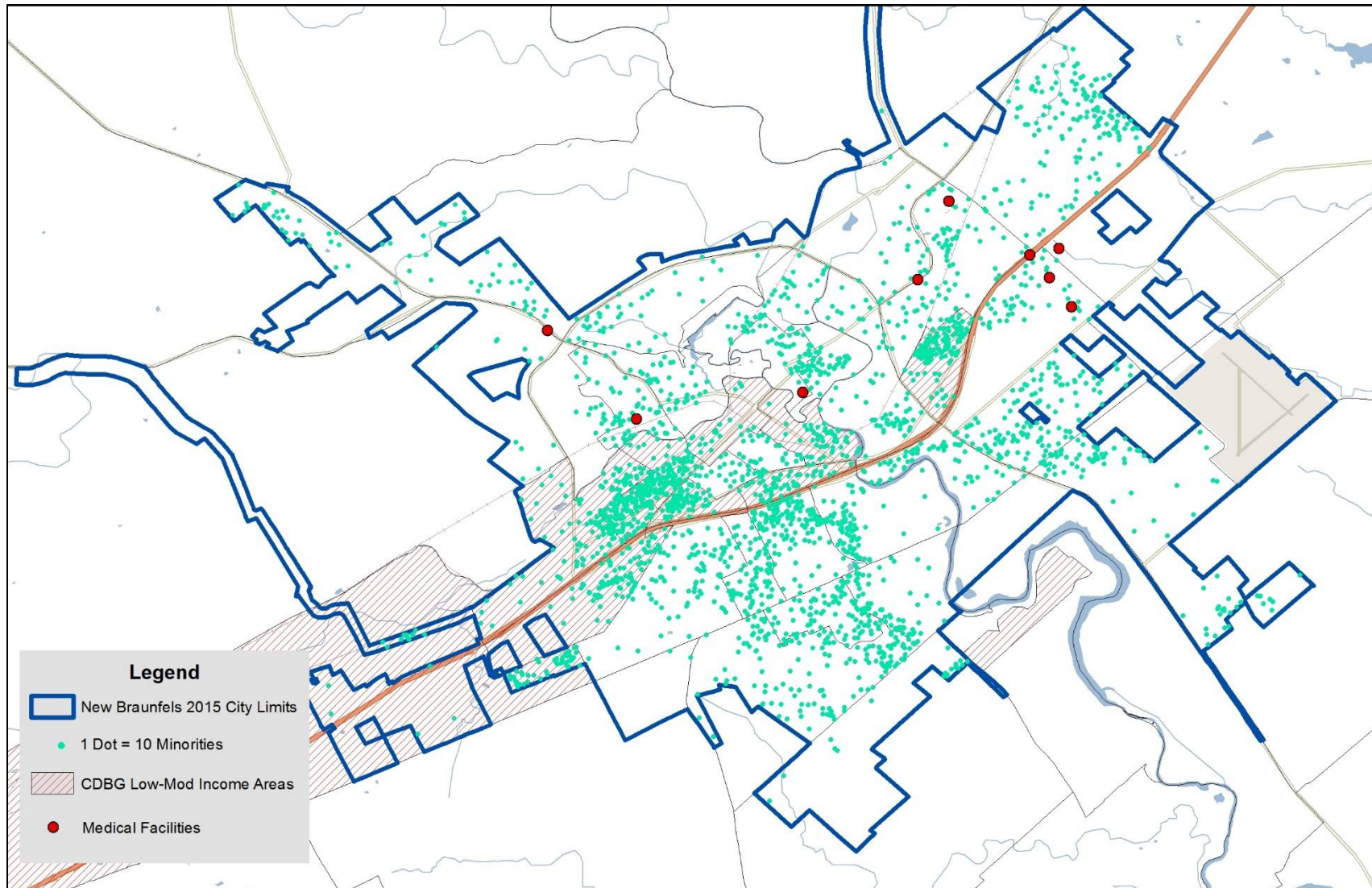
Access to Opportunity

Proximity to Amenities

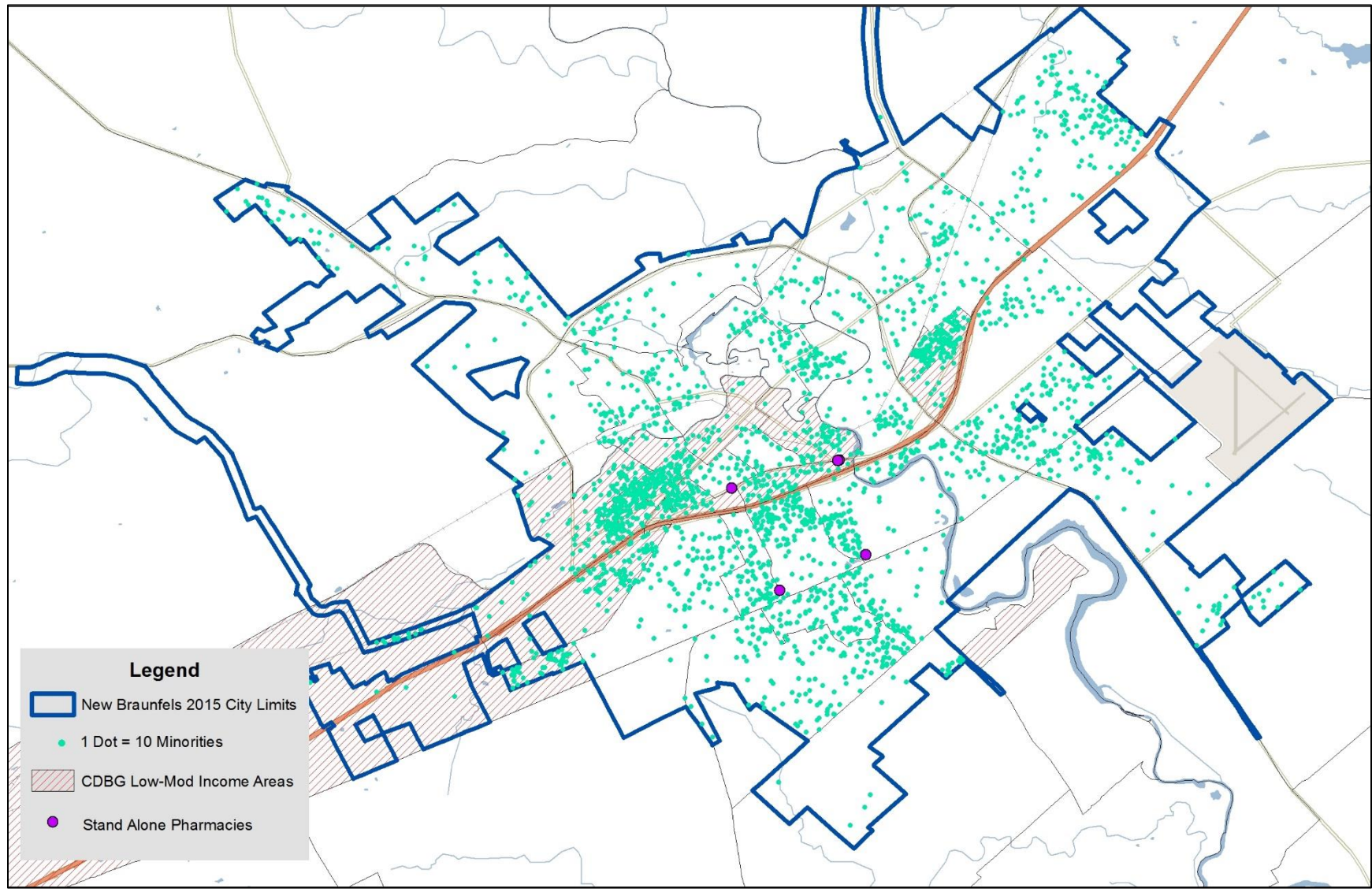
Amenities, particularly private sector amenities such as grocery stores, pharmacies, medical offices, follow population growth. As a result, new subdivisions may be lacking in the amenities until the critical mass of people make them viable. At that time, the private sector not only follows the people, but often abandons the neighborhoods that are older with lower incomes. One aspect of fair housing choice is the ability to have amenities accessible. Older neighborhoods with lower incomes, lower housing costs, and higher rates of protected class households have only neighborhood “mom and pop” and convenience stores which must charge more for products due to the lack of purchase power. The maps below show the locations of medical facilities; stand-alone pharmacies; big-box stores and grocery stores both with pharmacies; and City fire and EMS stations.

As can be seen, there are few such private sector amenities within the areas of high minority concentration or low- to moderate-income concentration, creating a grocery and medical desert inside Loop 337. There are two fire stations within the low- to moderate-income areas but none within high minority concentration areas.

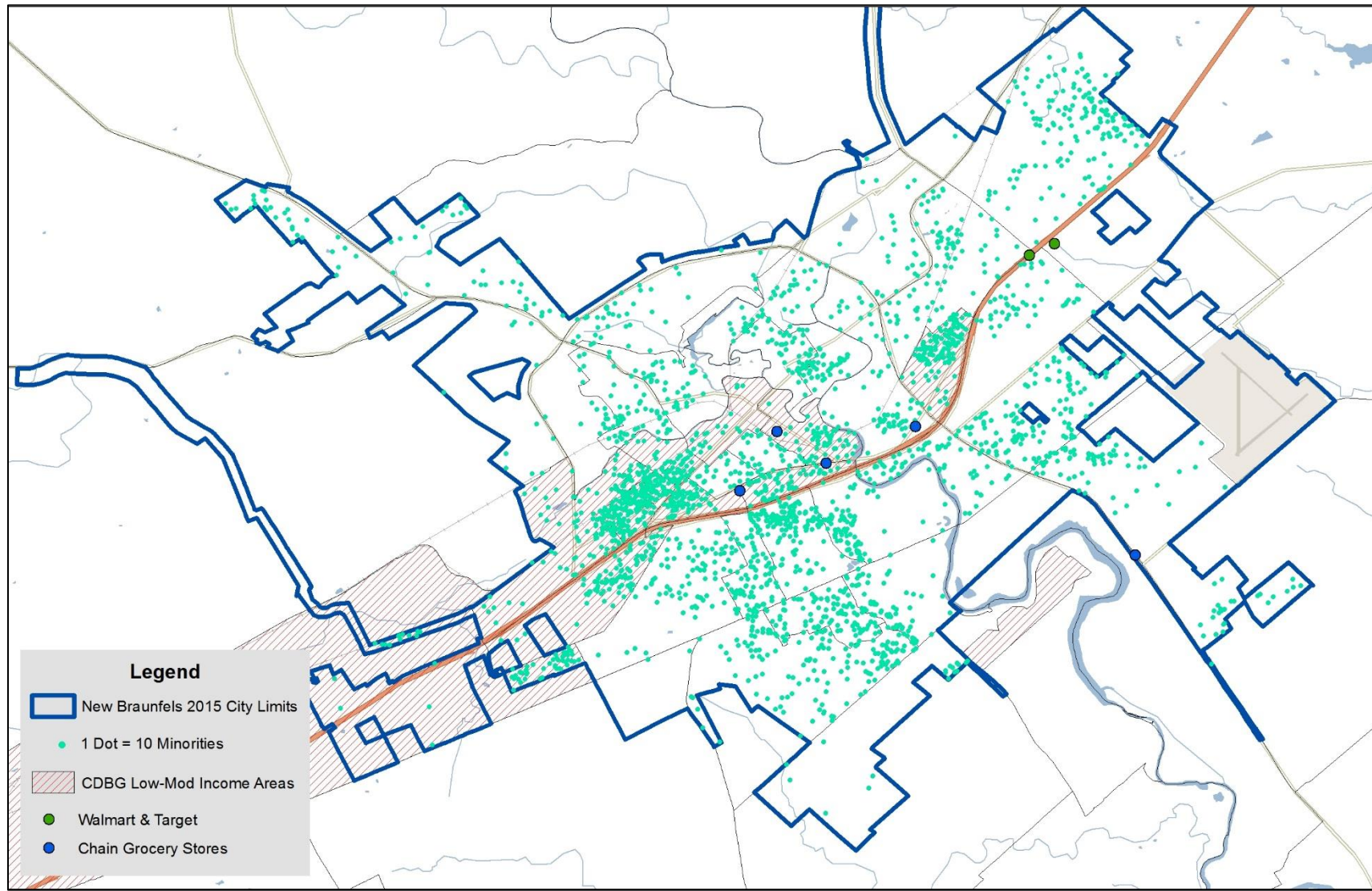
Map 26 – Location of Medical Facilities Over Minority Population and Low-Mod Income Areas



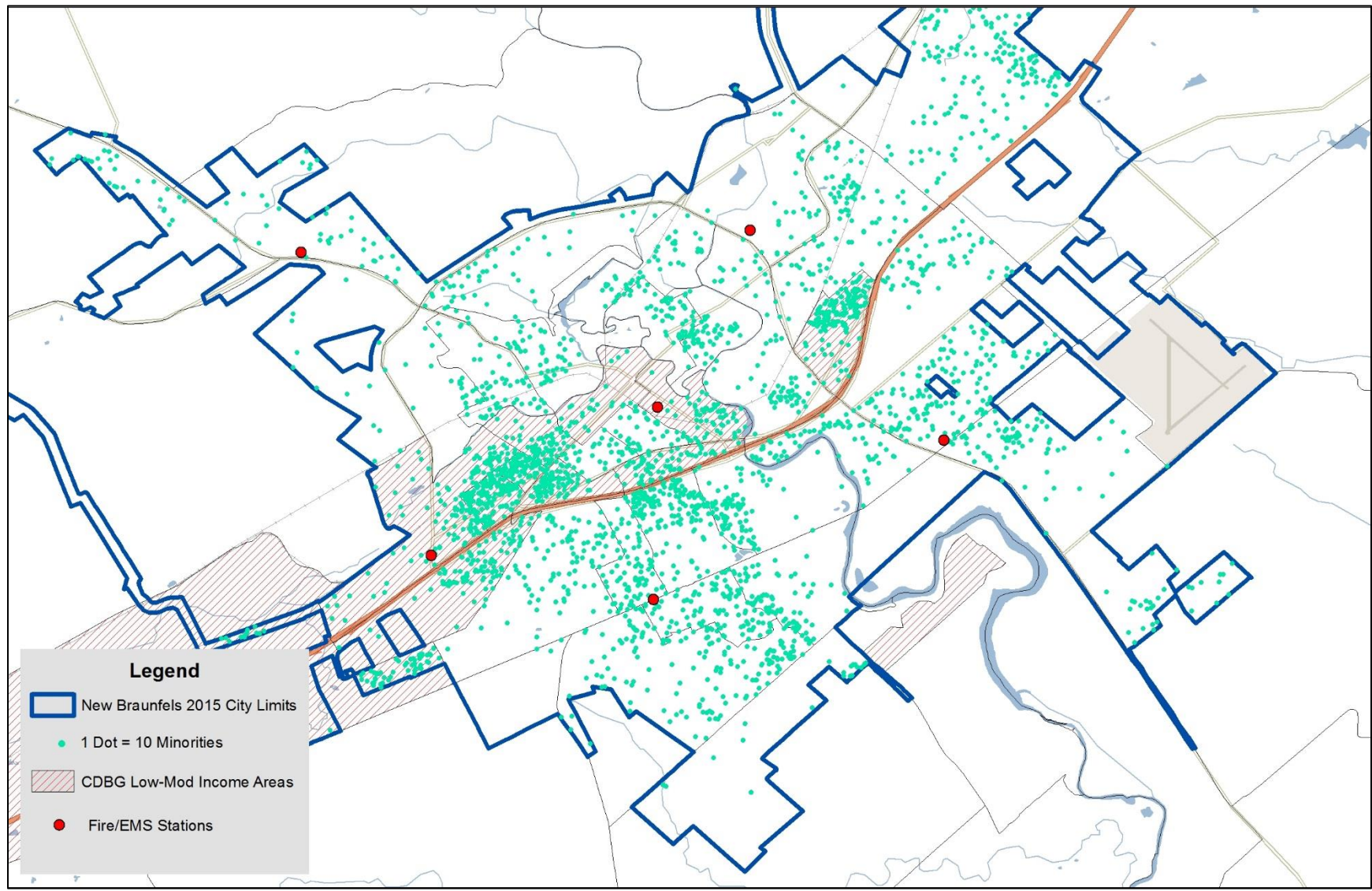
Map 27 – Location of Stand-Alone Pharmacies Over Minority Population and Low-Mod Income Areas



Map 28 – Location of Big Box and Grocery Stores (with Pharmacies) Over Minority Population and Low-Mod Income Areas



Map 29 – Location of City Fire and EMS Stations Over Minority Population and Low-Mod Income Areas



Opportunity Indicators

In addition to the accessibility of private and public amenities, the availability of opportunities is a critical indicator of disparity. HUD, through the AFFH-T, has developed various opportunity indicators for the city as a whole. No maps or sub-jurisdiction information is provided. The HUD AFFH Data Documentation explains the development of these indicators as follows:

HUD has developed a two-stage process for analyzing disparities in access to opportunity. The first stage involves quantifying the degree to which a neighborhood offers features commonly viewed as important opportunity indicators such as education, employment, and transportation, among others. This stage uses metrics that rank each neighborhood along a set of key dimensions. In the second stage, HUD compares these rankings across people in particular racial and economic subgroups to characterize disparities in access to opportunity. HUD considers opportunity indicators a multi-dimensional notion. To focus the analysis, HUD developed methods to quantify a selected number of the important opportunity indicators in every neighborhood. These dimensions were selected because existing research suggests they have a bearing on a range of individual outcomes. HUD has selected five dimensions upon which to focus: poverty, education, employment, transportation, and health.

Invariably, these dimensions do not capture everything that is important to the well-being of individuals and families. In quantifying indicators of access to opportunity, HUD is not making a definitive assessment of one's life chances based on geography. HUD is quantifying features of neighborhoods for the purpose of assessing whether significant disparities exist in the spatial access or exposure of particular groups to these quality of life factors. While these important dimensions capture a number of key concepts identified by research as important to quality of life, the measures are not without limitations. HUD constrained the scope of HUD-provided items to those that are closely linked to neighborhood geographies and could be measured consistently at small area levels across the country. For example, HUD's measure of school performance only reflects elementary school proficiency. It does not capture academic achievement for higher grades of schooling, which are important to a community's well-being, but likely less geographically tied to individual neighborhoods than elementary schools. Similarly, the health hazard measure only captures outdoor toxins, missing indoor exposures. The national-availability restriction is a necessity given that all HUD program participants must complete an Assessment of Fair Housing. HUD realizes that there are other assets that are relevant, such as neighborhood crime or housing unit lead and radon levels. However, these lack consistent neighborhood-level data across all program

participant geographies. As a consequence, HUD encourages program participants to supplement the data it provides with robust locally-available data on these other assets so that the analysis is as all-encompassing as possible. The five dimensions are operationalized by seven indices, described below.

Table 33 – Explanation of the Opportunity Indices and Scoring

Index	Interpretation of the scores
Low Poverty Index	<p>The higher the score, the less exposure to poverty in a neighborhood. The non-Hispanic whites have higher scores than other groups in New Braunfels, except for the Asians. All of the scores are lower for population below the poverty line, except for Asians, indicating that households in poverty live near other households in poverty, making their exposure to poverty higher than for the population as a whole. New Braunfels has higher scores than the region for all categories except Native Americans below the poverty line.</p>
School Proficiency Index	<p>The higher the score, the higher the school system quality is in a neighborhood. The scores for the population below the poverty line are slightly lower than for the total population in New Braunfels. Both categories are much higher than the region's scores.</p>
Labor Market Engagement Index	<p>The higher the score, the higher the labor force participation and human capital in the neighborhood. The scores are generally higher in New Braunfels than in the region across the board, in several groups, nearly 20 points higher.</p>
Transit Trips Index	<p>The higher the transit trips score, the better access to public transit and the more likely residents in the neighborhood utilize public transit. As with the transportation cost index, the transit trips index is much lower in New Braunfels than the region because of the much higher level of public transit in San Antonio.</p>
Low Transportation Cost Index	<p>The higher the score, the lower the cost of transportation in the neighborhood. The transportation cost index is much lower (costlier) than the region. This stands to reason, as San Antonio, the largest population base in the region has a high level transit system.</p>
Job Proximity Index	<p>The higher the score, the better the access to employment opportunities for residents in a neighborhood. The scores are relatively close across racial/ethnic lines, with the Hispanics having a slightly higher score than other groups. Among the population below poverty, Native Americans and Hispanics have higher scores than other groups. All of the scores for the total population are higher than for the region, and only African Americans below poverty are higher in the region than in New Braunfels.</p>

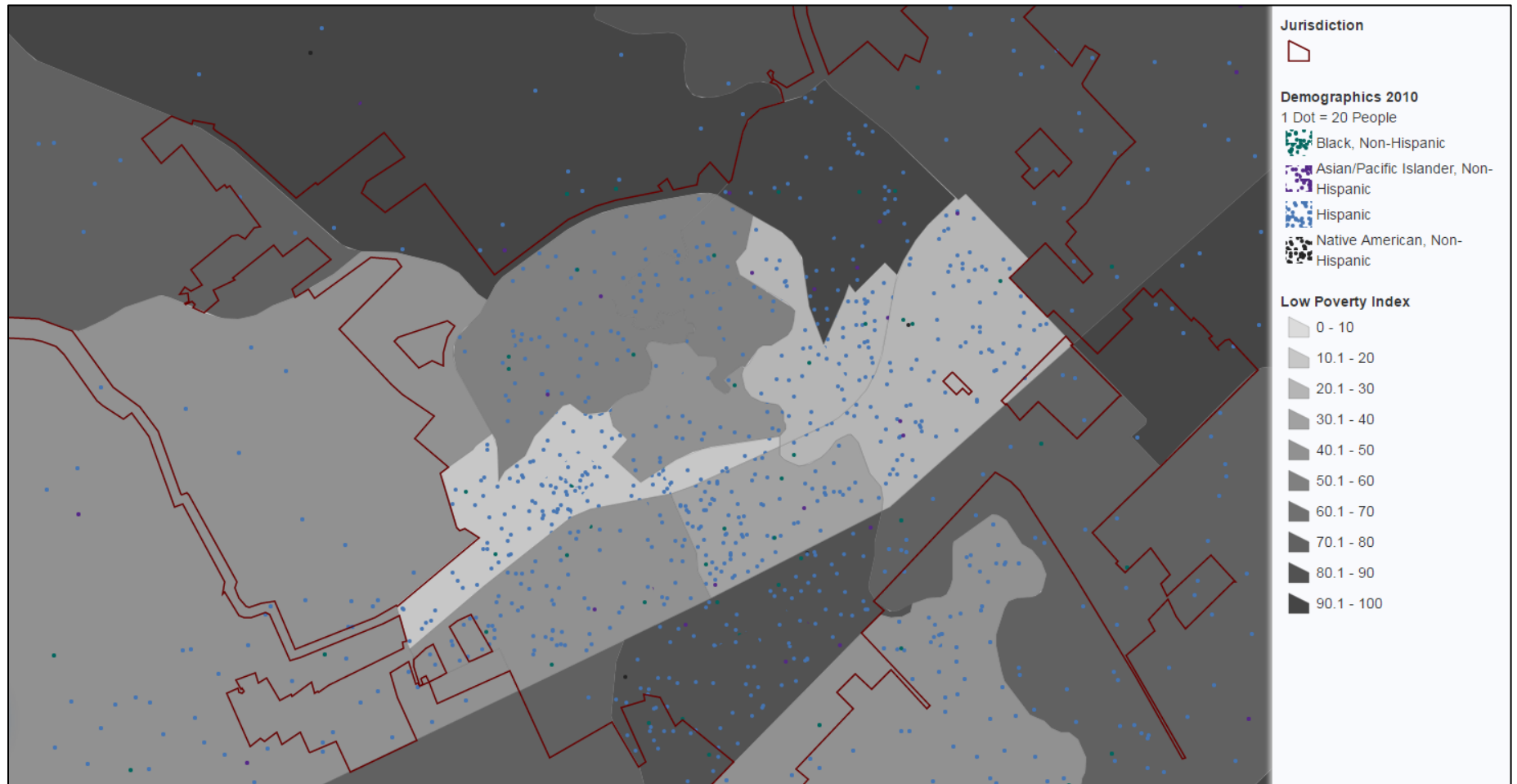
Environmental Health Index	<p>The index, based on air quality based on carcinogenic, respiratory, and neurological hazards, summarizes the potential exposure to harmful toxins at a neighborhood level. The higher the value, the better the environmental quality of the neighborhood.</p> <p>The region is higher than New Braunfels in every racial/ethnic category except for Asians below poverty. In some cases, the county fares better by nearly 20 points.</p>
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While the indices are developed at the census tract and block group level, the actual database provided is only at the city level. As a result, only ranges within each variable are available and the data cannot be merged with local map layers to create city-based maps. The table from the AFFH-T at the city and MSA level is below, followed by a series of maps provided on-line at the AFFH-T website as well as more detail for some of the indicators, such as school quality. The AFFH-T maps do not allow for changes in the value ranges and are only in shades of grey.

Table 34 – Opportunity Indicators by Race/Ethnicity from HUD’s AFFH-T

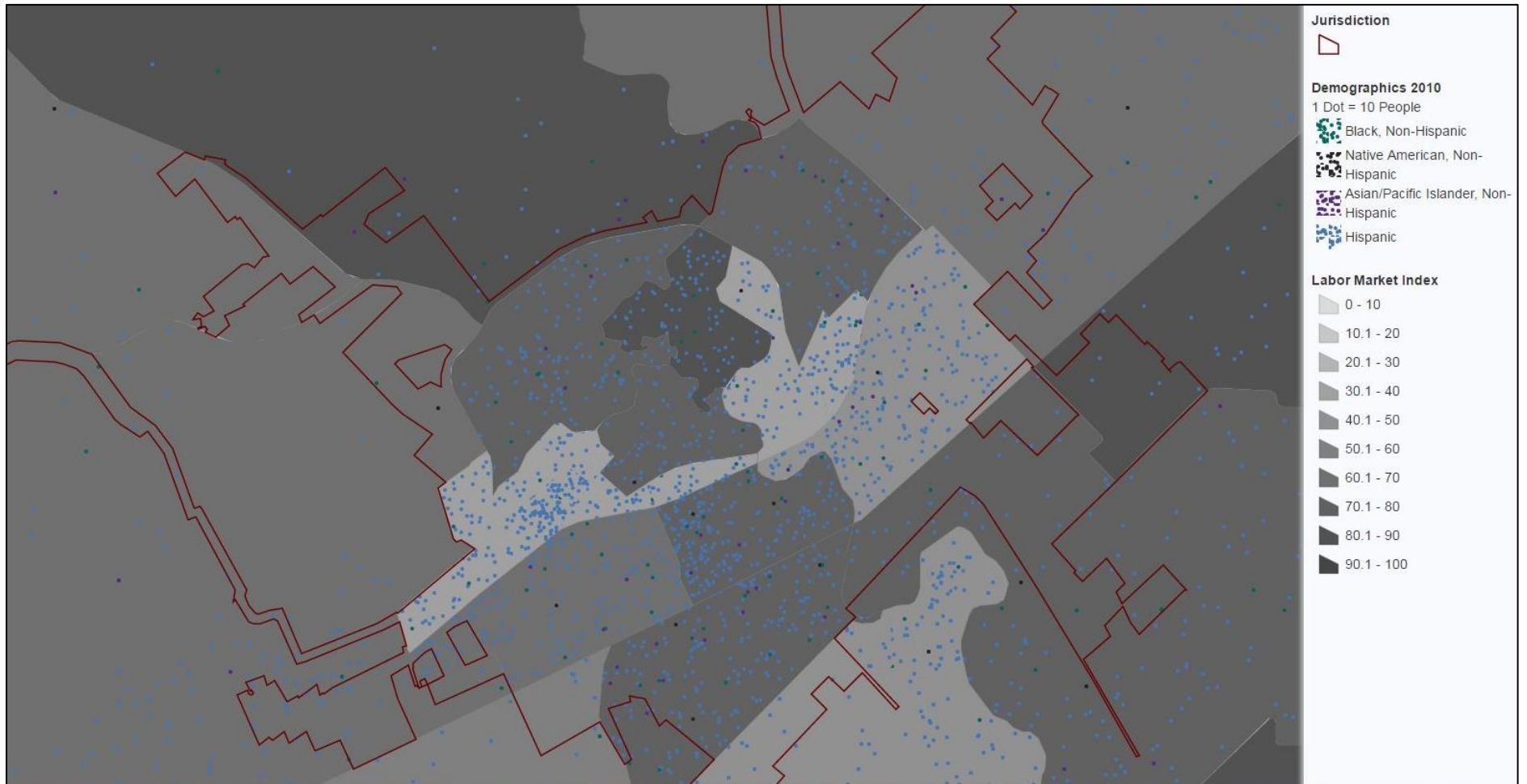
(New Braunfels, TX CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	59.05	73.66	69.10	39.98	29.36	59.24	37.40
Black, Non-Hispanic	52.58	70.73	64.77	40.91	30.16	57.89	36.33
Hispanic	46.00	69.63	60.54	42.72	32.55	61.22	33.14
Asian or Pacific Islander, Non-Hispanic	63.00	74.62	68.46	38.82	27.70	53.70	37.25
Native American, Non-Hispanic	55.16	71.82	66.46	38.74	28.66	55.70	33.80
Population below federal poverty line							
White, Non-Hispanic	48.62	70.83	62.12	42.89	32.47	60.03	35.72
Black, Non-Hispanic	43.62	69.84	59.24	44.57	33.33	49.10	48.00
Hispanic	35.62	65.17	53.42	44.66	34.89	63.79	31.02
Asian or Pacific Islander, Non-Hispanic	74.86	74.26	78.41	44.02	25.49	50.54	40.15
Native American, Non-Hispanic	22.89	61.80	41.78	47.00	41.56	65.79	28.00
(San Antonio-New Braunfels, TX) Region							
Total Population							
White, Non-Hispanic	62.11	57.21	63.96	50.69	35.35	50.98	51.49
Black, Non-Hispanic	46.27	41.71	47.52	59.74	41.33	49.15	45.48
Hispanic	39.29	41.40	42.61	60.45	42.50	45.55	46.61
Asian or Pacific Islander, Non-Hispanic	64.58	56.95	68.09	60.02	42.82	52.99	45.98
Native American, Non-Hispanic	51.94	48.07	53.92	54.34	38.13	49.66	49.34
Population below federal poverty line							
White, Non-Hispanic	47.67	47.50	52.91	56.28	41.84	52.94	48.61
Black, Non-Hispanic	29.25	31.70	36.23	65.63	48.32	50.96	40.32
Hispanic	26.53	34.69	31.93	62.75	45.75	46.55	45.16
Asian or Pacific Islander, Non-Hispanic	52.33	47.64	58.06	66.15	51.59	58.41	38.06
Native American, Non-Hispanic	31.28	34.75	33.20	60.95	44.87	49.97	45.53

Map 30 – Low Poverty Index



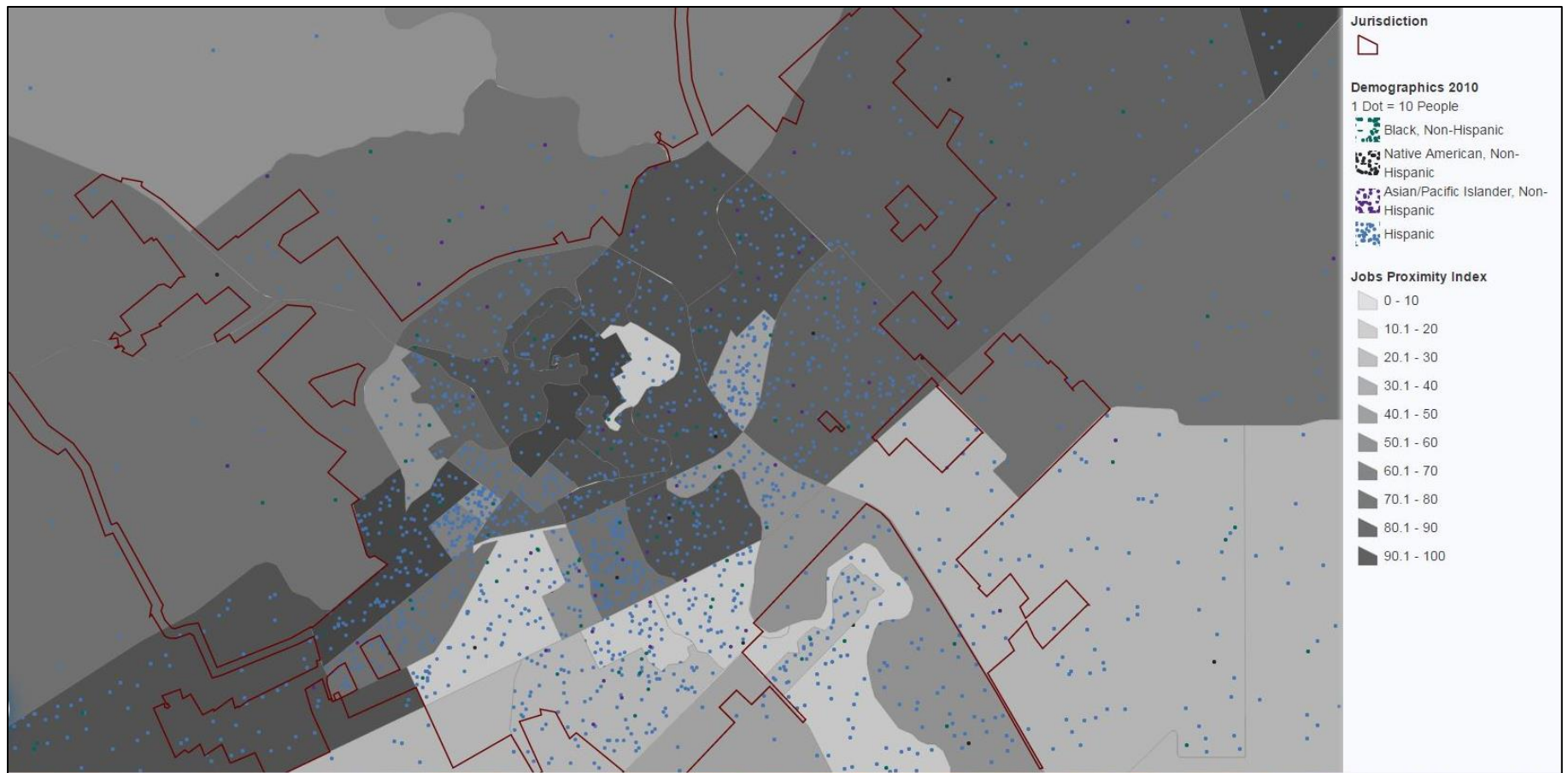
The higher the score (darker the shading), the less exposure to poverty in a neighborhood.

Map 31 – Labor Market Index



The higher the score (darker the shading), the higher the labor force participation and human capital in the neighborhood.

Map 32 – Job Proximity Index



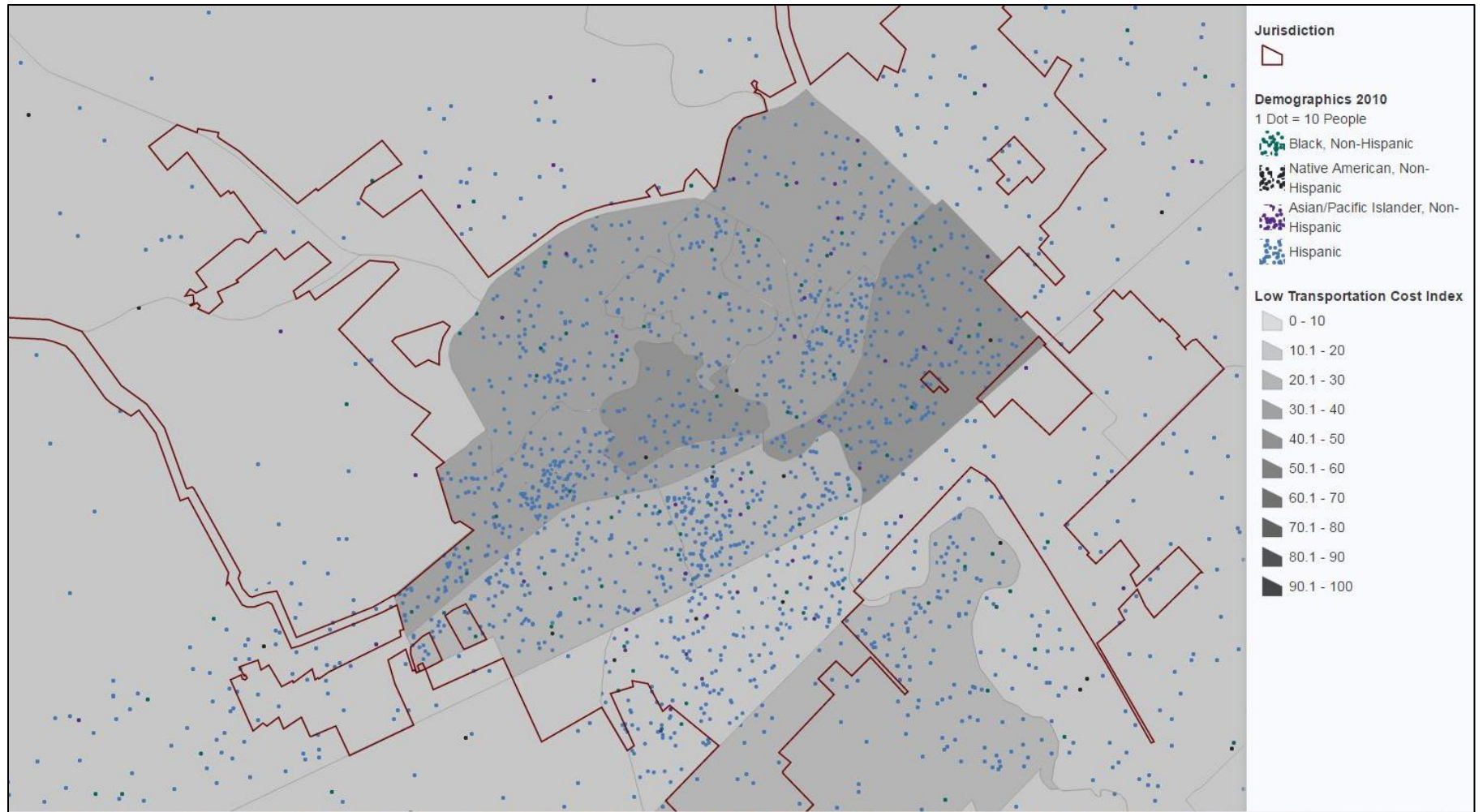
The higher the score (darker the shading), the better the access to employment opportunities for residents in a neighborhood.

Map 33 – Transit Index



The higher the transit trips score (darker the shading), the better access to public transit and the more likely residents in the neighborhood utilize public transit.

Map 24 – Transportation Cost Index



The higher the score (darker the shading), the lower the cost of transportation in the neighborhood.

School Data and School Proficiency

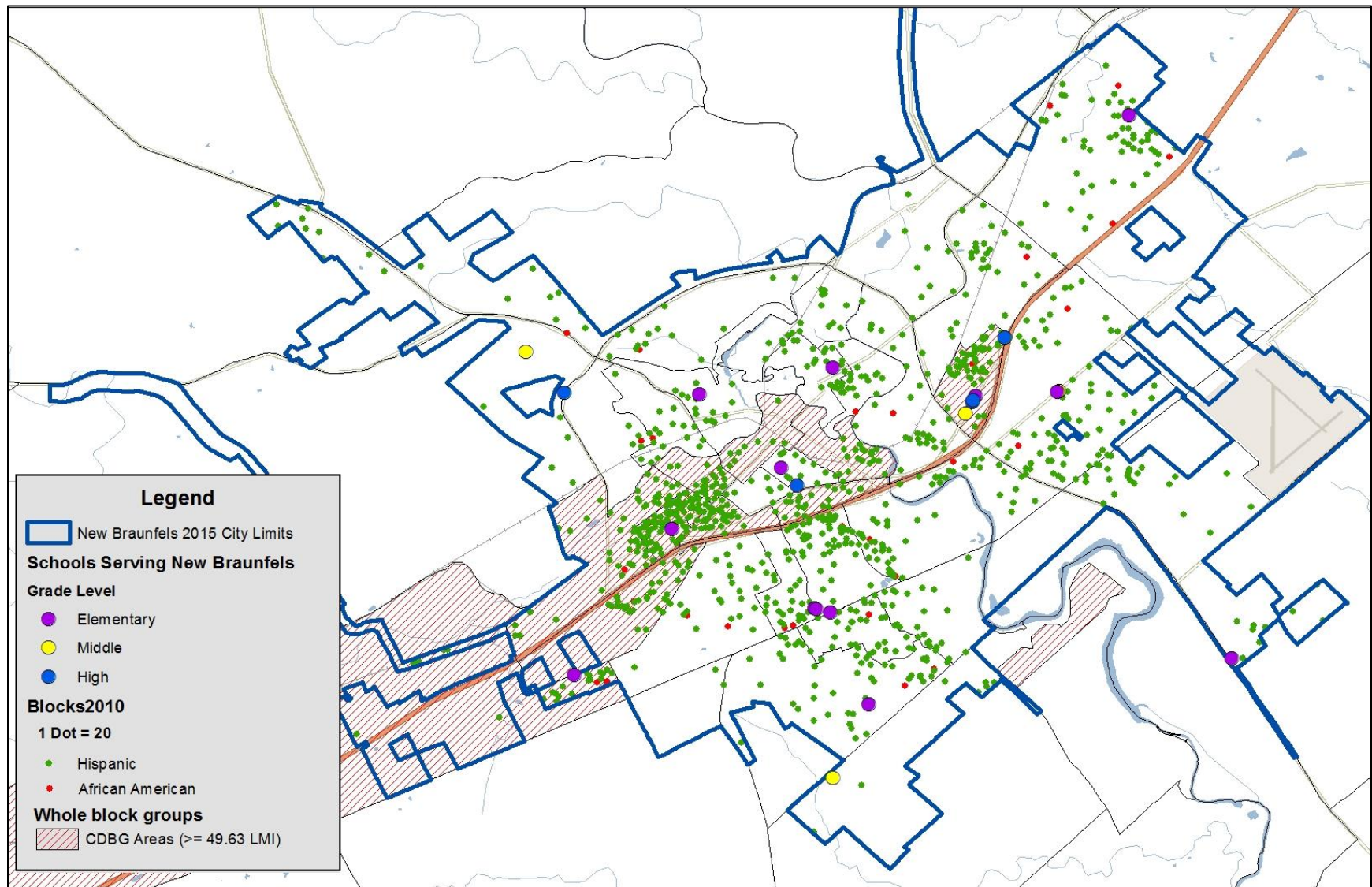
The New Braunfels and Comal Independent School Districts serve New Braunfels children. There are a total of 4 high schools, 3 middle schools, and 11 elementary schools in the area. The next map shows their locations. As can be seen, there are no middle schools inside Loop 337 north of IH 35, and no high schools south of IH 35. The area inside Loop 337 with the highest concentration of minority and low-income households has a shortage of schools with only one elementary school in the area, one elementary and one high school adjacent to the area.

There are too few schools for any valid or reliable statistical analysis, however the maps following the location map does show some comparisons among the elementary schools. Additionally, it should be noted that in order to use the same time period for all the variables, the 2011-2012 school year is the latest available. Therefore, the information presented is five years old. The first map shows the dollars per total students spent on bilingual education over the percent Limited English Proficiency students. As can be seen, school 18 (Morningside) has a high percent LEP with a relatively low dollar amount per student. The same is true for school 10 (Memorial) and 19 (Clear Spring). The remaining schools show that the higher the percent LEP, the more dollars are spent per student on bilingual education. The second comparison map shows the percent of at risk students over the per-student expenditures on instruction. School 10 (Memorial) falls within the lowest per student expenditure range and the highest percent of at risk students. School 2 (Lone Star) falls within the second lowest per student expenditure range and highest percent of at risk students. These two schools are in areas of high minority concentration. Memorial also falls within the lowest range of per student expenditures and the second highest range of economically disadvantaged students. Lone Star falls within the second lowest per student expenditure range and the highest range of economically disadvantaged students. As would be expected, all of the schools within or adjacent to the CDBG eligible areas of low to moderate income have high rates of economically disadvantaged students, particularly those schools within Hispanic clusters.

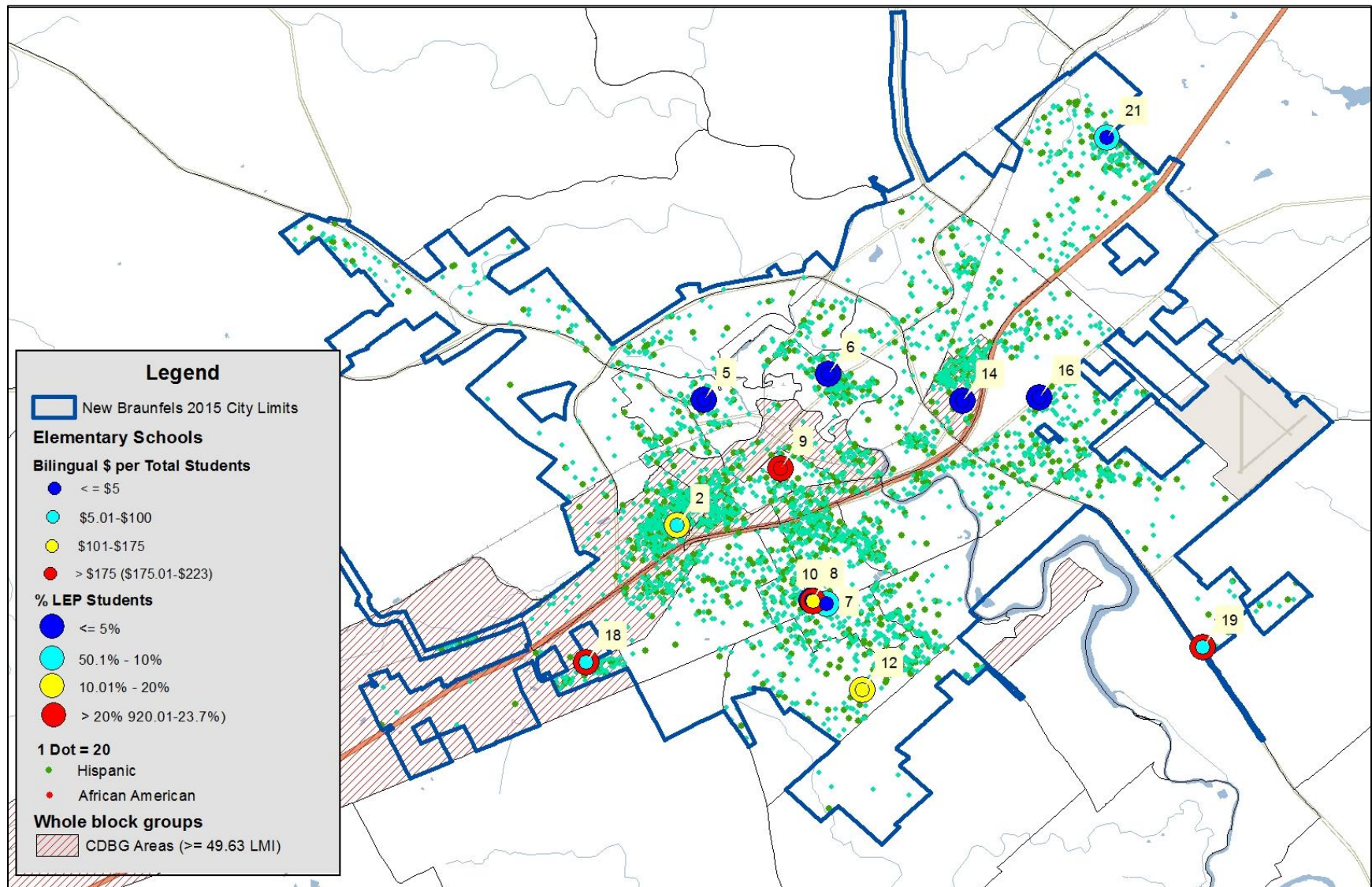
The student teacher ratios are relatively low in New Braunfels elementary schools, ranging from 12.29 to 18.47. However, all but one of the schools inside Loop 337 north of IH 35 has the highest range at 17.5 – 18.47 students per teacher. The schools in New Braunfels generally have good ratings. None of the elementary schools were rated unacceptable by the Texas Education Agency and all but one was rated Exemplary (highest rating) or Recognized (second highest rating). All of the schools inside Loop 337 north of IH 35 have been rated as Exemplary or Recognized.

The final school map is from HUD's AFFH-T and is the school proficiency map. The higher the score and darker the grey shading, the higher the school system quality is in a neighborhood. The scores for the population below the poverty line are slightly lower than for the total population in New Braunfels. Both categories are much higher than the region's scores. The map shows census tract level data which can be misconstrued as school attendance zones do not follow census tract boundaries and tracts are large, encompassing multiple schools.

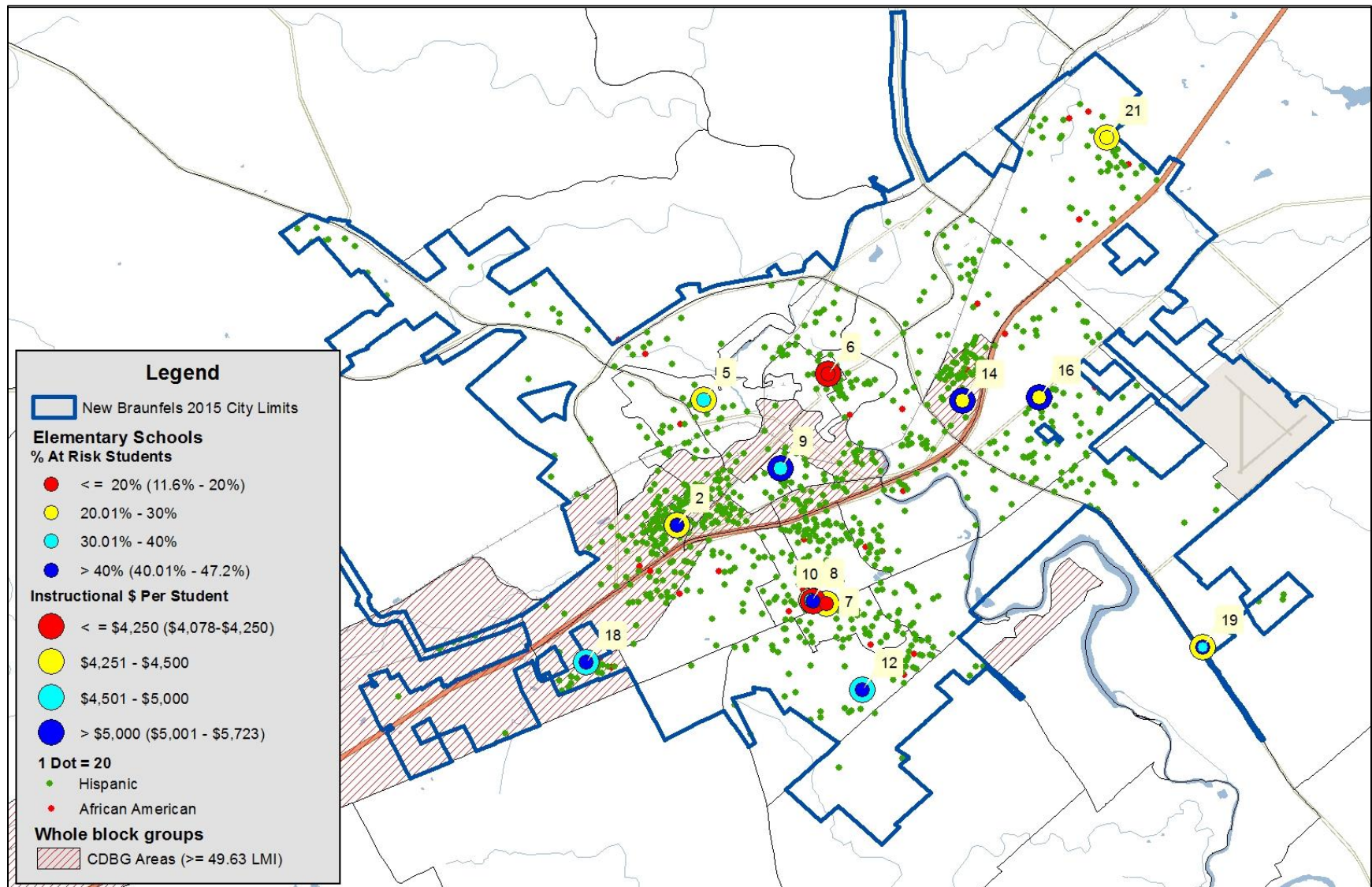
Map 35 – Schools in New Braunfels



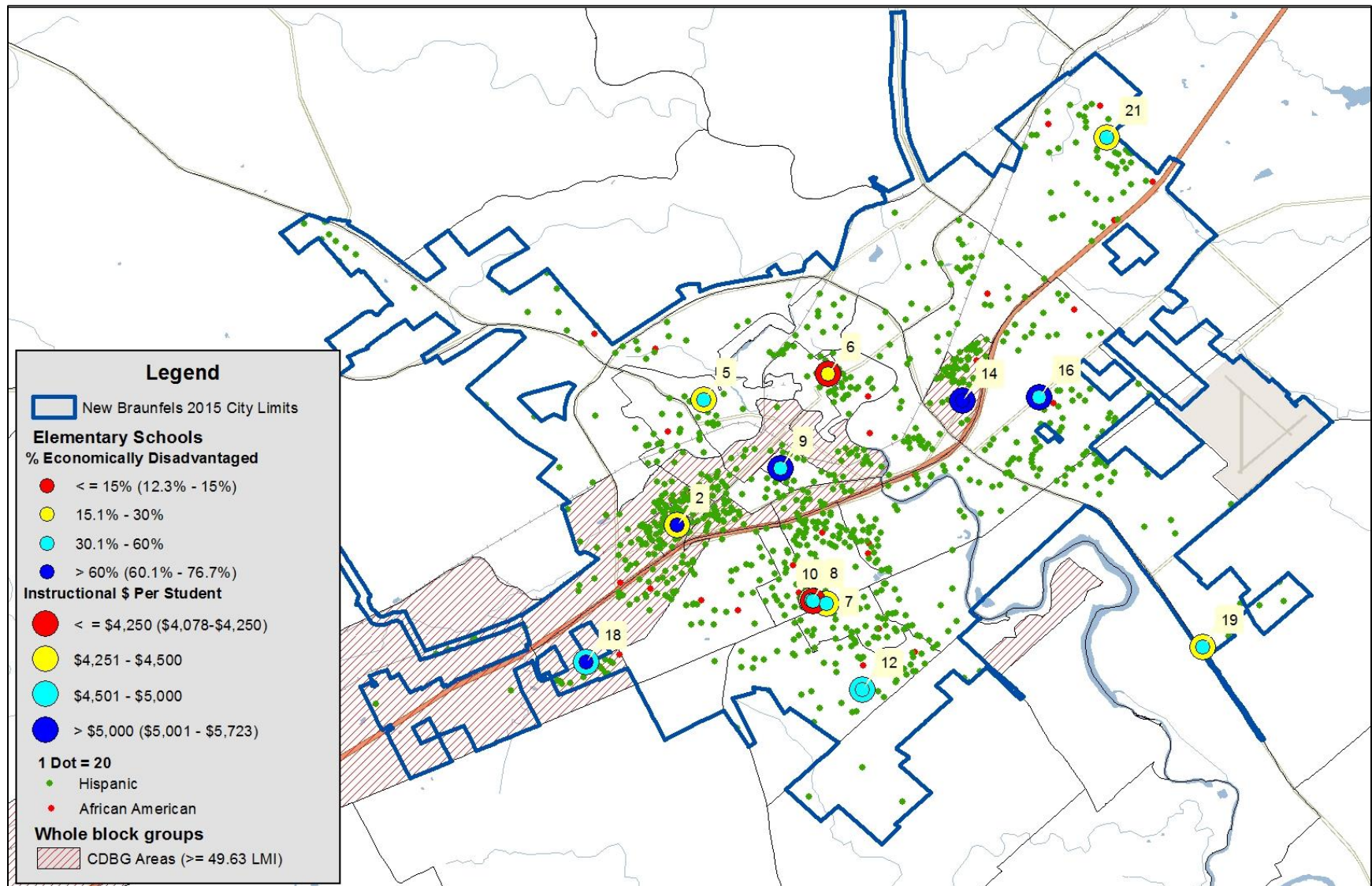
Map 36 – Bilingual Education Dollars Spent Per Total Students Over Percent LEP Students for Elementary Schools



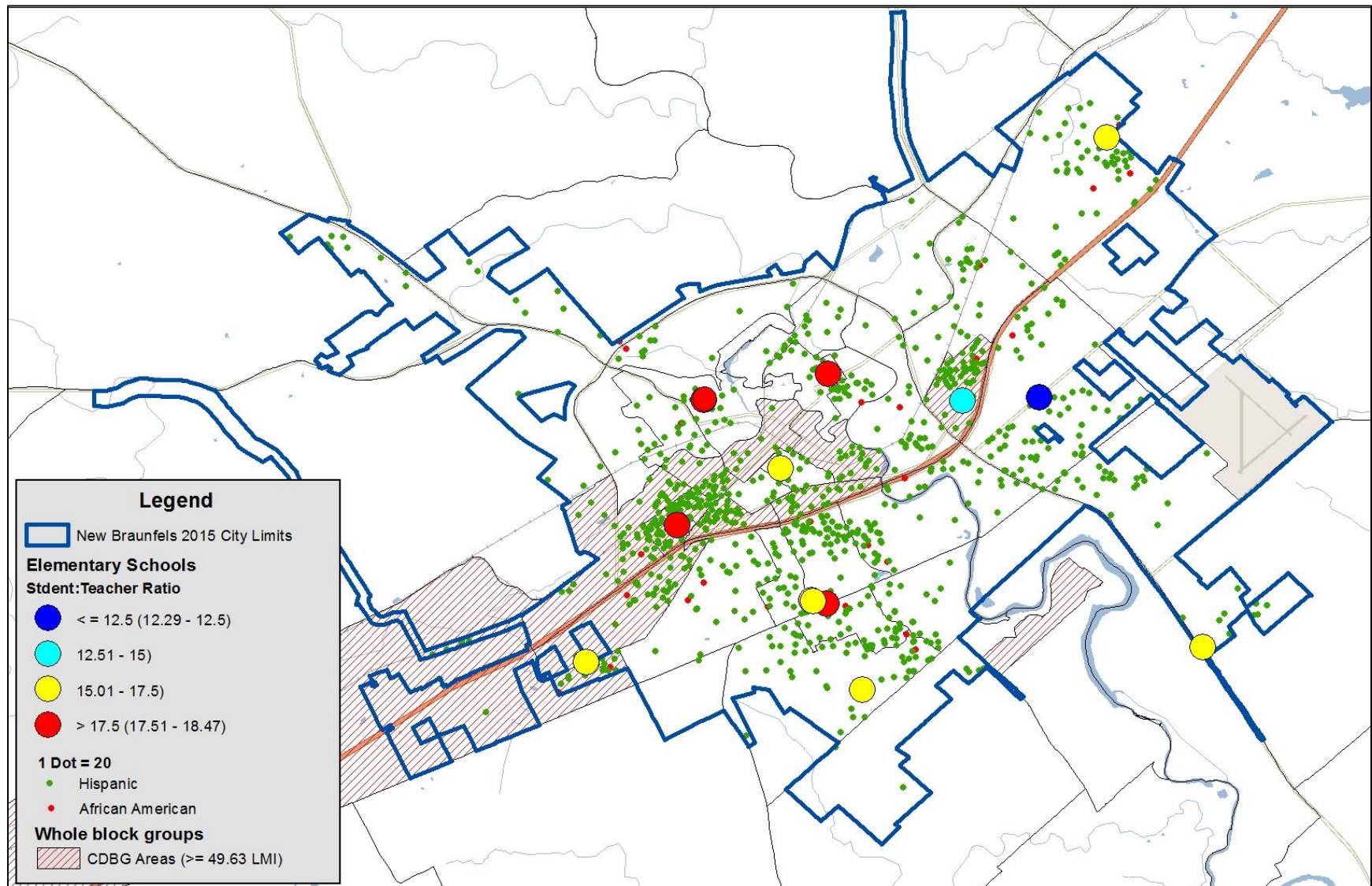
Map 37 – Percent At Risk Students Over Total Instructional Dollars Per Student for Elementary Schools



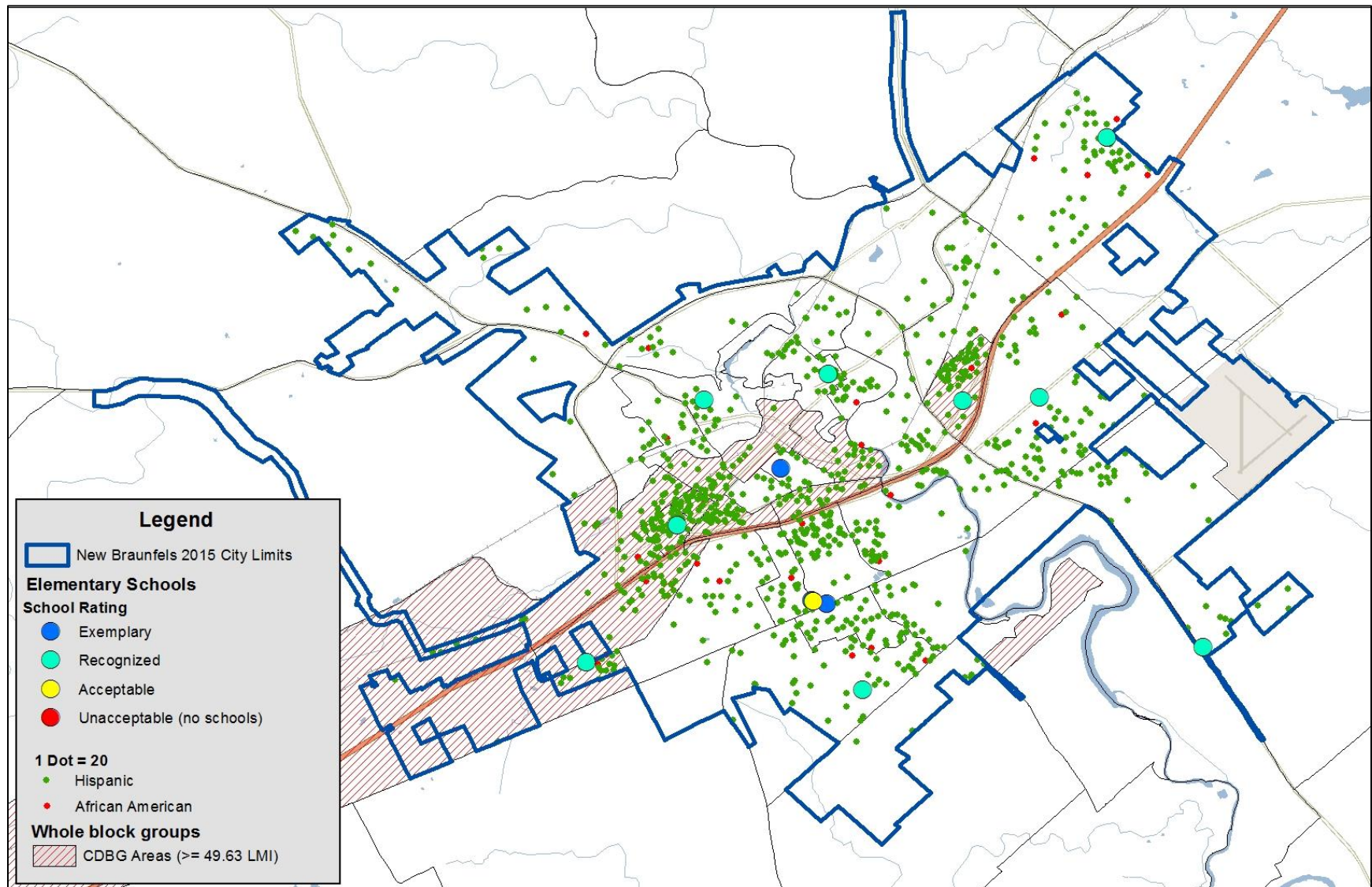
Map 38 – Percent Economically Disadvantaged Students Over Total Instructional Dollars Per Student for Elementary Schools



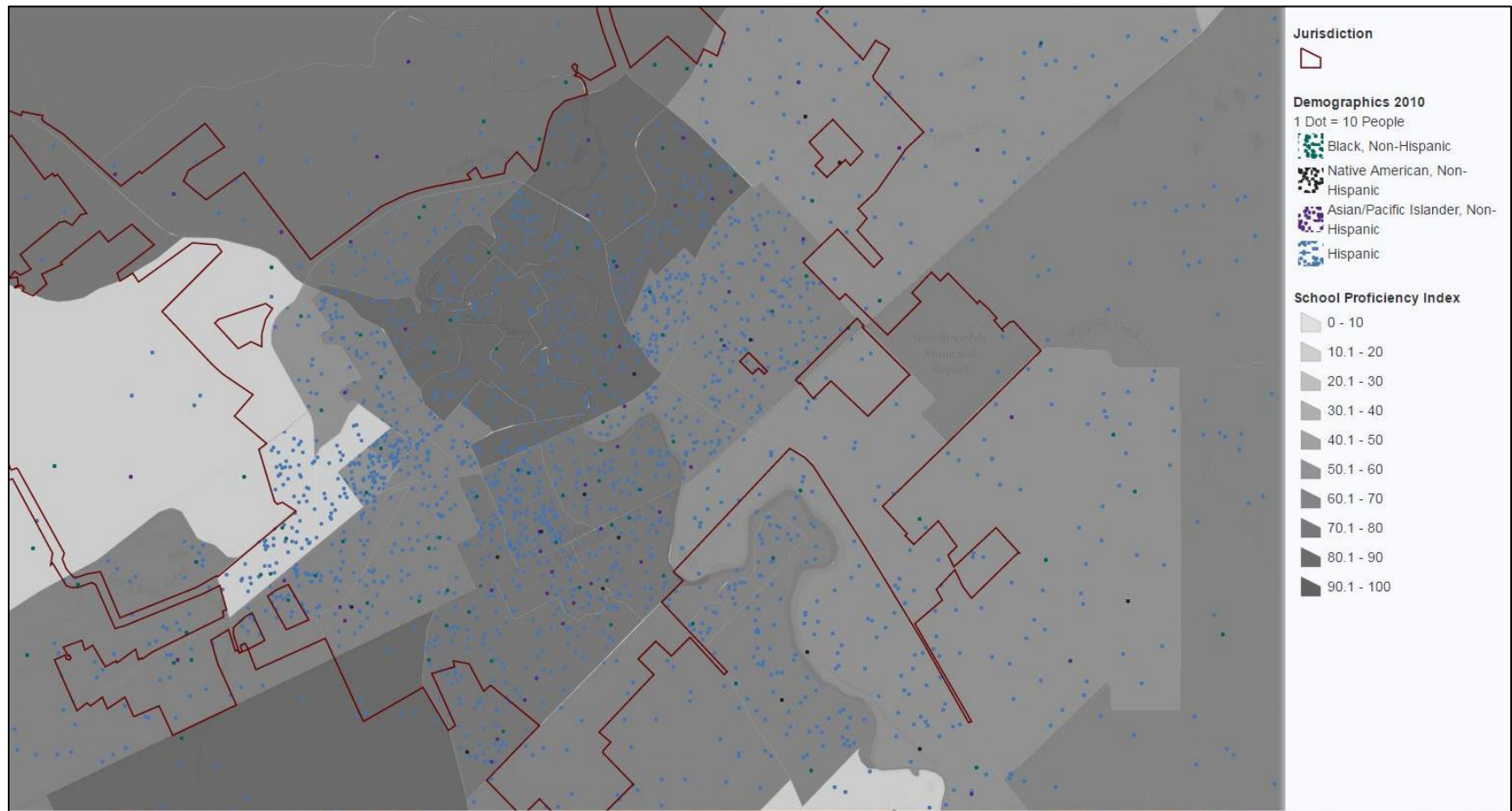
Map 39 – Student:Teacher Ratio for Elementary Schools



Map 40 – Elementary School Ratings by Texas Education Agency



Map 41 – School Proficiency Index from AFFH-T



The higher the score (darker the grey shading), the higher the school system quality is in a neighborhood.

Environmental Health

One aspect of inequality of fair housing choice and safe housing is the varying environmental quality throughout the area. While other aspects of equity consist of access to amenities and equal quality infrastructure and facilities in areas of minority or low income concentrations, environmental health indicators are based on the negative infrastructure and facilities that may be concentrated in minority or low income neighborhoods. The Environmental Protection Agency provides a number of mapping tools to pinpoint the location of air, water, and ground polluters as well as other environmental hazards. The series of maps below show the locations of various potential polluters in New Braunfels.

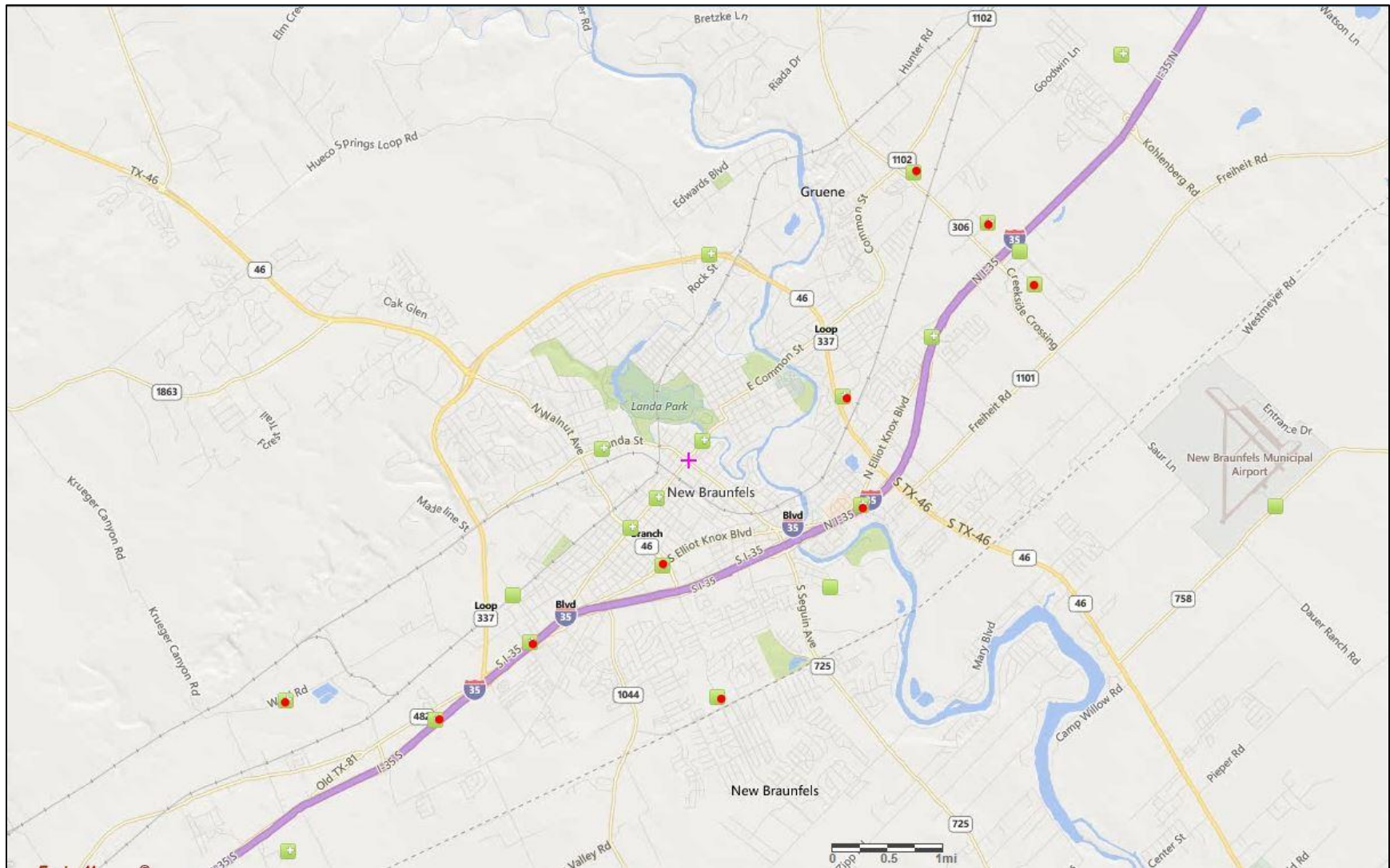
The first map shows the releasers of potentially hazardous waste. A red dot has been placed on those sites which involve some sort of manufacturing. The remaining sites include amenities such as pharmacies, medical clinics/hospitals, grocery stores, big box stores, gas stations, and dry cleaners. Most of the locations with the red dots are located toward the outskirts of New Braunfels and are not in areas of high minority or low income concentration.

The second map shows the locations where there are releases of toxic chemicals into the water, air and/or soil. These include PCBs, asbestos, radon, and lead-based paint. Biological waste through water discharges is also included.

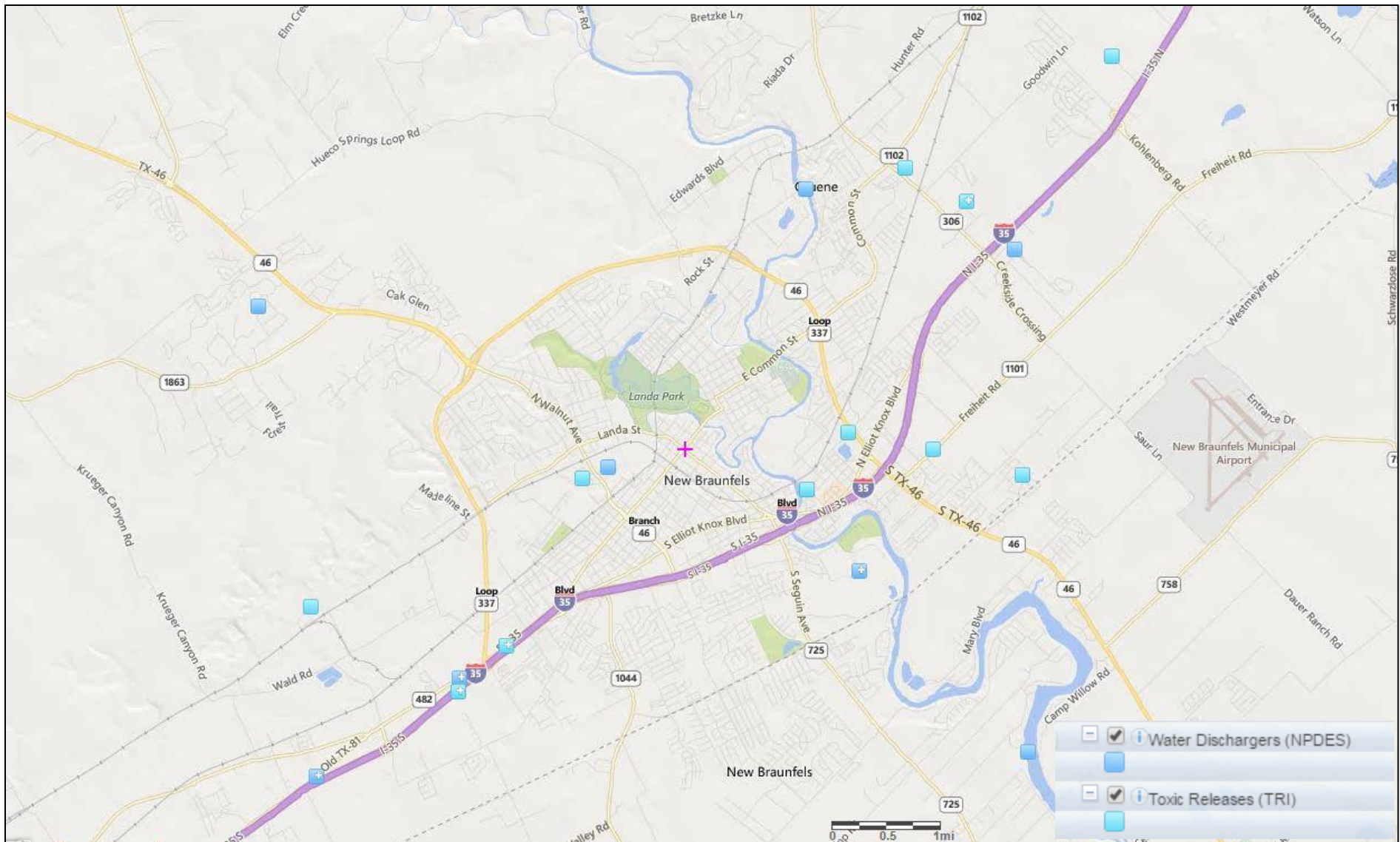
There are no brownfields or superfund sites in New Braunfels, according to the EPA. Additionally, New Braunfels is not a non-attainment area for ozone, lead, SO², PM_{2.5}, and PM₁₀. Due to the rivers that flow through New Braunfels, there are flooding dangers in a large portion of the area inside Loop 337 north of IH-35, but the areas fall under the 500-year floodplain.

One major concern in New Braunfels is the air pollution level. The AFFH-T's Environmental Health Index is based on air quality determined by levels of carcinogenic, respiratory, and neurological hazards. It summarizes the potential exposure to harmful toxins at a neighborhood level. The higher the value, and darker the grey shading on the map, the better the environmental quality of the neighborhood. The region is higher than New Braunfels in every racial/ethnic category except for Asians below poverty. In some cases, the county fares better by nearly 20 points. The primary polluter in New Braunfels is Cemex, a cement manufacturer. The EPA filed suit against the cement manufacturer and in 2016 the case was settled with Cemex in which the company will expend \$10 million to reduce harmful air emissions at its plants in Alabama, Kentucky, Tennessee, and Texas, including New Braunfels. The two key pollutants emitted by the plant are Nitrogen Oxide and Sulfur Dioxide, which not only is harmful to humans directly but are significant contributors to acid rain, smog, and haze. It is anticipated that with the implementation of the required pollution reductions, the air quality in New Braunfels will improve dramatically.

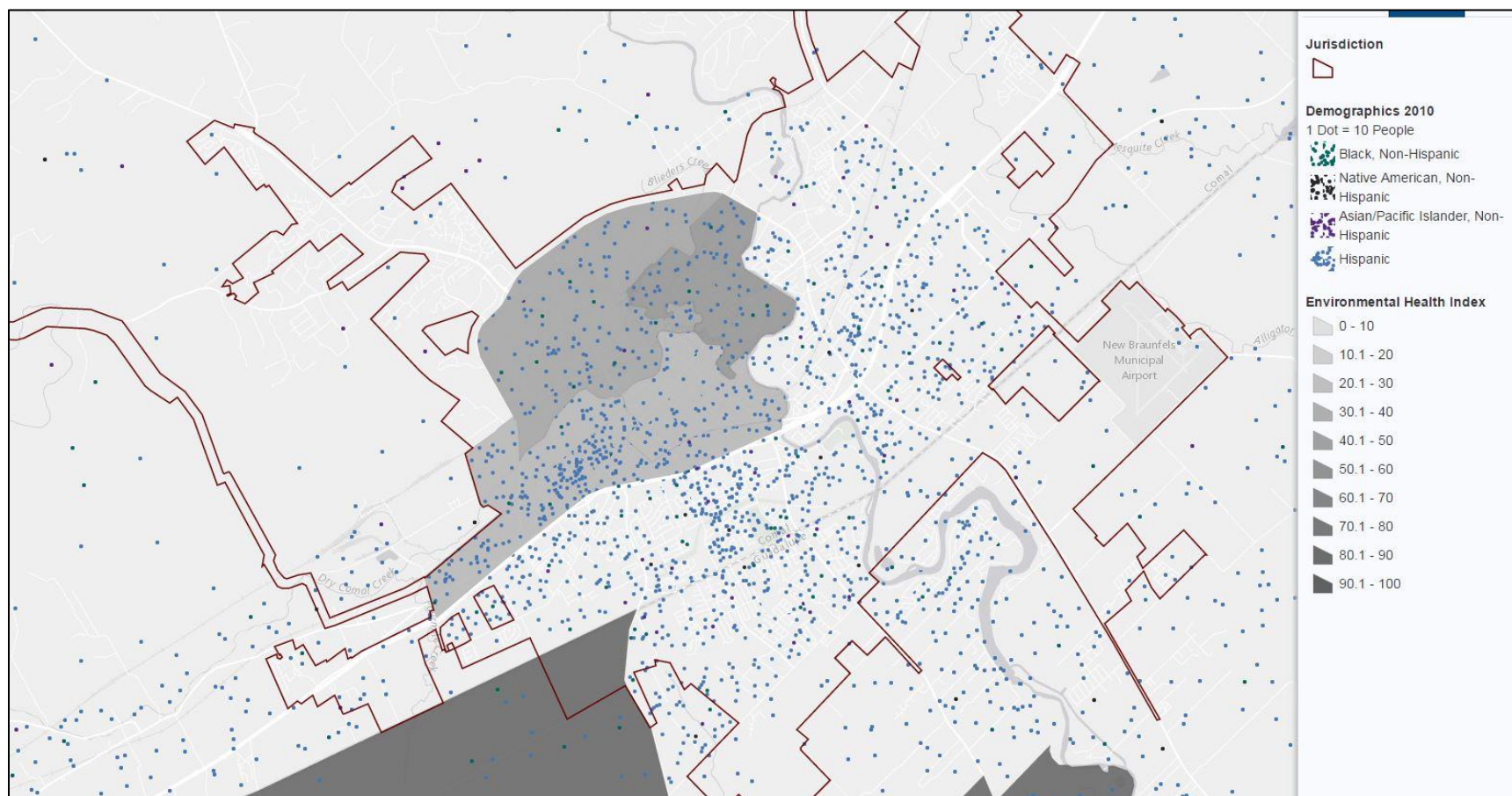
Map 42 – Locations of EPA-Recognized Hazardous Waste Releasers



Map 43 – Water Discharge and Toxic Release Locations



Map 44 – Air Pollution Health Hazard Index from AFFH-T



The higher the value, and darker the grey shading on the map, the better the environmental quality of the neighborhood.

Legislative and Regulatory Assessment

The City of New Braunfels has a Fair Housing Ordinance that is found in Article II of Chapter 70 – Human Relations – of the City’s Municipal Code. Section 70-27 states the declaration of policy for the ordinance as:

It is hereby declared to be the policy of the city to bring about, through fair, orderly and lawful procedures, the opportunity for each person to obtain housing without regard to his race, color, creed, religion, national origin, sex, age or marital status, physical or mental handicap, or parenthood. It is further declared that this policy is grounded upon a recognition of the inalienable right of each individual to provide for himself and his family a dwelling according to his own choosing; and further, that the denial of such rights through considerations based upon race, color, creed, religion, national origin, sex, age or marital status, physical or mental handicap, or parenthood, constitutes an unjust denial or deprivation of such inalienable right which is within the power and the proper responsibility of government to prevent.

The ordinance sets forth a procedure for receiving complaints, investigating, hearing, legal proceedings, placement of a fine of up to \$300 per violation, and cooperation with HUD in resolving the issues. The ordinance is included in the attachments.

In addition to the Fair Housing Ordinance, the City’s Fair Housing Officer also conducts activities throughout the year to affirmatively further faith housing, including:

- Providing fair housing information at CDBG-related public hearings;
- Providing fair housing information to subrecipients during monitorings;
- Conducting a housing rehabilitation program to assist low- to moderate-income elderly and/or disabled homeowners, to make their homes safe and livable, including retrofitting the property to be accessible to any physical limitations;
- Conducting code enforcement activities city-wide in a non-discriminatory manner; and
- Focusing CDBG-funded infrastructure and facility improvements, as well as improvements funded through other sources, in the core CDBG low- to moderate-income and minority neighborhoods, particularly in the western part of the area inside Loop 337.

A review of the zoning, development, and building codes indicates that there is no undue regulatory burden placed on members of the protected classes, low-income, or providers of affordable housing. The City conforms to the 2015 International Building Code, 2015 International Residential Code, 2005 National Electrical Code, 2015 International Plumbing Code, and the 2015 International Mechanical Code.

The City maintains a Planning and Zoning Commission which has the power to make and recommend the adoption of a master plan for future development and redevelopment of the city; and, make and recommend ordinances for platting and zoning in accordance with the Texas Local Government Code. As part of the planning process the City maintains a Zoning Board of Adjustment.

Building Code and platting fees are in line with the majority of Texas cities. The zoning ordinance and zoning districts do not negatively impact fair housing choice. There is a heavy industrial district along the Guadalupe, but there is commercial and resort commercial areas buffering the district from the residential districts. The city does have mobile home parks and manufactured home developments. The development ordinances for mobile home parks and manufactured home developments do not put an undue burden on the developer or future residents.

The City has a Community Development Advisory Committee, comprised on nine residents, at least two of whom are low- to moderate-income. The CDAC serves in an advisory capacity to the city council on matters related to the CDBG program. The City also has a Downtown Board that operates under the requirements of the Texas Main Street Program and serves as an advocate for the Downtown Implementation Plan.

FAIR HOUSING PLAN AND ACTION STEPS

The City of New Braunfels is committed to affirmatively furthering fair housing choice throughout its jurisdiction. Title VIII of the Civil Rights Act of 1968 makes discrimination based on race, color, religion, sex, national origin, familial status or handicap illegal in connection with the sale or rental of housing and any vacant land offered for residential construction or use. The City is committed to doing all in its power and legal authority to ensure that Title VIII is followed where housing is concerned.

All low- to moderate-income households, regardless of their protected-class status under the Fair Housing Act, face impediments in accessing affordable housing and housing in choice locations. This is often especially true for elderly and disabled individuals and large families. The limited stock of the housing within a price range affordable to the low- to moderate-income is, for the most part, older housing that has not been retrofitted for ADA compliance and accessibility to the physically disabled and/or may not meet Housing Quality Standards as set forth by HUD. The rental market, while relatively new, is lacking sufficient units with more than three bedrooms for large families. Many middle-income residents are living in units well below their affordability limits, pushing the lower-income residents to higher-cost housing that is out of their affordability level.

As part of the City's plan to utilize Community Development Block Grant and other funds, the City is committed to addressing issues of fair housing choice. Based on the findings of the Assessment of Fair Housing, as detailed above, New Braunfels commits to the following actions:

Demographic Impediments and Action Steps

Impediment 1: Low- to moderate-income residents throughout the community are lacking financial independence and skilled labor and blue collar job opportunities. The job opportunities in the immediate area are primarily white collar professional jobs.

Action Step 1a: The City will continue to use CDBG funds to assist in supporting local social service agencies that provide emergency food, meals on wheels, rent/utility assistance, and other important social services for low- to moderate-income residents, particularly elderly, disabled, and homeless.

Housing Impediments and Action Steps

Impediment 2: New Braunfels has a shortage of affordable rental housing, particularly

housing for large families.

Action Step 2a: Though the City acknowledges the impediment, there is no remedy it can take to directly address the issue. The City will investigate ways in which the CDBG staff can collaborate with the Public Housing Authority in the delivery of affordable housing options. The City will meet with the New Braunfels Housing Authority at least annually to investigate possible collaboration activities.

Action Step 2b: The City will continue to review all applications to the State for Low Income Housing Tax Credits and will support viable projects.

Action Step 2c: The City will continue to review and approve, when viable, applications for funding by non-profits to provide down payment and closing cost assistance to first time homebuyers who are low- to moderate-income.

Action Step 2d: During the next five (5) years, the City will assess its current development and zoning ordinances to determine remedies to the shortage of rental housing for large families.

Impediment 3: Possible predatory lending for homes in new subdivisions and denial of loans to minorities or moderate-income.

Action Step 3a & b: The City has no authority to recommend, much less require, builders and independent lenders to require down-payments and closing cost payments and to not over mortgage the property. However, during the next five (5) years, the City will work with regional groups, including the Fair Housing Council of Greater San Antonio and Habitat for Humanity, to attempt to have first-time homebuyer counselling and education available in or near New Braunfels and advertised throughout the city. Approximately 4 classes will be made available in New Braunfels during the next five (5) years.

Impediment 4: New Braunfels has a shortage of affordable and safe rental units for disabled individuals.

Action Step 4a: Though the City acknowledges the impediment, there is no remedy it can take to directly address the issue. The City will investigate all complaints filed by or on behalf of a disabled person who has been unable to secure accessible housing, not allowed to make reasonable accessibility modifications, or not allowed to have a service animal or caregiver in their unit. With added awareness of fair housing and the

City's Fair Housing Ordinance, it is anticipated that the City will investigate 3 complaints over the next five (5) years.

Impediment 5: Possible discrimination against protected classes by landlords, realtors, lenders, and homeowners associations.

Action Step 5a: The City will continue to enforce the Fair Housing Ordinance and have a Fair Housing Officer who is responsible for (1) providing educational materials and/or workshops on fair housing; (2) receiving and investigating fair housing complaints; (3) assisting complainants in filing documentation with the appropriate authorities; (4) reviewing City policies to ensure there is no violation to the Fair Housing Act or related Acts; and, (5) maintaining a log of all fair housing activities, inquiries, and complaints with the outcomes.

Impediment 6: Many low- to moderate-income and protected class homeowners are unable to repair their homes making the homes inefficient and, often, dangerous as well as causing a decline in the neighborhood.

Action Step 6a: During the next five (5) years, the City will continue to provide minor housing repair and accessibility retrofitting to owner-occupied housing for low- to moderate-income owners, particularly the elderly and disabled. At least 40 houses will be rehabilitated or retrofitted for accessibility during the next five (5) years.

Access to Opportunity Impediments and Action Steps

Impediment 7: Due to the age of some residential areas in New Braunfels, public infrastructure and facilities are either inadequate or deteriorating limiting access to residents, particularly LMI and protected class residents.

Action Step 7a: During the next five (5) years, the City intends to invest CDBG, Capital Improvement, and general funds into the upgrades to the infrastructure and facilities in the areas of high low-income and minority concentrations.

Impediment 8: There are limited private amenities in the core part of the city such as the area due northeast of Loop 337 and IH-35 South in the heart of the CDBG LMI area.

Action Step 8a: The City will investigate the viability of providing incentives to chain grocery stores and big box stores in the area. During the next five (5) years, the City will negotiate with at least three (3) new private ventures that will benefit the LMI and protected class residents will locate in the CDBG service areas.

Impediment 9: Aging neighborhoods in New Braunfels have numerous code violations and abandoned properties that are hindering the health and safety of the residents and preventing the areas from becoming desirable for desegregation and redevelopment.

Action Step 9a: During the next five (5) years, the City will continue to focus code enforcement in the CDBG service areas and other older mixed-use, mixed-income communities, particularly those with a concentration of minorities and elderly. At least 200 citations will be issued and violations resolved.

Action Step 9b: During the next five (5) years, the City will demolish and clear at least 3 blighted properties in low-income and minority neighborhoods.

Legislative and Regulatory Impediments and Action Steps

Impediment 10: Fair Housing rights are not generally known throughout New Braunfels and Fair Housing advocates in the region are generally unaware of fair housing violations in the City.

Action Step 10a: During the next five (5) years, the City staff will include a fair housing information component to all CDBG public hearings, totally five (5) introductions to fair housing.

Action Step 10b: During the next five (5) years, the City staff will conduct at least one (1) activity per year during Fair Housing Month. These may include postings on the City website, providing educational pamphlets to be given to local libraries and community centers, independent fair housing workshops open to City staff, realtors, lenders, landlords, public service agencies, and the public.

Action Step 10c: Though the City has a comprehensive Fair Housing Ordinance, the public is not generally aware of it or that they can file a complaint with the City. During the next five (5) years, the City will maintain on its official website a posting about the Fair Housing Ordinance and how residents can file a complaint about any violations.

Summary Table of Action Steps and Timeline

Table 35 – Summary Table of Action Steps and Timeline

<i>Impediment</i>	Total		Year 1		Year 2		Year 3		Year 4		Year 5	
Action Step	P*	A**	P*	A**	P*	A**	P*	A**	P*	A**	P*	A**
<i>1. Lack of financial independence & job opportunities</i>												
1a: Support social services providing financial assistance and economic opportunities	\$50K		\$10K		\$10K		\$10K		\$10K		\$10K	
<i>2. Shortage of affordable housing</i>												
2a: Investigate ways to collaborate with the New Braunfels Housing Authority via an annual meeting	5		1		1		1		1		1	
2b: Review all LIHTC applications	2		1		0		0		1		0	
2c: Continue to fund non-profits to provide down payment and closing cost assistance	\$50K		\$10K		\$10K		\$10K		\$10K		\$10k	
2d: Review development & zoning ordinances	1		0		1		0		0		0	
<i>3. Shortage of affordable, safe rental units for disabled individuals</i>												
3a: Investigate all fair housing complaints filed by or on behalf of a disabled individual	3		0		1		1		1		0	
<i>4. Need for homebuyer/homeownership classes to afford predatory lending</i>												
4a&b: Work with non-profits to provide classes	4		0		1		1		1		1	
<i>5. Possible discrimination by landlords, realtors, lenders, HOAs</i>												

5a: City will continue to maintain a Fair Housing Officer to conduct activities and maintain a log of activities and complaints	25		5		5		5		5		5	
<i>6. Inability to maintain, repair owned homes or retrofit for accessibility</i>												
6a: City will continue to rehabilitate and retrofit owner occupied homes	40		10		10		10		5		5	
<i>7. Inadequate public infrastructure & facilities, primarily in LMA & minority areas</i>												
7a: Improve infrastructure and facilities Old Townsite & other LMAs	\$1M		\$200K		\$200K		\$200K		\$200K		\$200K	
<i>8. Lack of private amenities in older LMAs</i>												
8a: City will encourage and assist in mixed use developments and increased retail, entertainment, and support facilities	3		0		0		1		1		1	
<i>9. Code violations in LMI/minority neighborhoods</i>												
9a: City will continue to conduct code enforcement activities particularly in LMI and minority neighborhoods	200		40		40		40		40		40	
9b: City will demolish and clear at least 3 blighted properties in LMI and minority neighborhoods	3		0		0		1		1		1	
<i>10. Lack of awareness of fair housing rights</i>												
10a: City will include a fair housing education component in every CDBG public hearing	10		2		2		2		2		2	
10b: City staff will conduct at least 1 fair housing activity per year during Fair Housing Month	5		1		1		1		1		1	

10c: During the next 5 years the City will maintain on its official website a posting about the Fair Housing Ordinance and how to file a complaint	5		1		1		1		1		1	
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* P = Planned Activities; ** = Accomplished Activities