

**Analysis of Impediments to Fair Housing Choice
2015 Update**

To Satisfy the Requirements of 24 CFR § 91.225(a)(1)

August 14, 2015



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Introduction

AFFIRMATIVELY FURTHERING FAIR HOUSING: As part of its mission to administer federal grants, the City of Bryan Community Development Services Department is required by Executive Order 12892 to affirmatively further fair housing in the programs and activities within its jurisdiction. The City of Bryan has adopted a Fair Housing Ordinance under Chapter 58, Article II of the City of Bryan Code of Ordinances and conducts an Analysis of Impediments to Fair Housing Choice update every five years to coincide with the 5-Year Consolidated Plan process.

Fair housing protections are guaranteed and regulated by Federal, state, and local statutes, ordinances, regulations, guidelines, and executive orders. No person shall be subjected to discrimination because of race, color, religion, sex, disability, familial status, age, or national origin. These are known as “Protected Classes”. Discriminatory housing practices are prohibited in all housing—both publicly and privately-owned and developed housing. HUD defines unlawful discriminatory actions as including: Discrimination in the sale or rental of a dwelling; in the terms and use of housing; by members of the real estate industry; Discriminatory advertising; and in residential real estate-related transactions to members of a protected class.

Fair Housing Complaints:

Fair housing complaints may be filed online with the U.S. Department of H.U.D. here:

<http://www.hud.gov/offices/fheo/online-complaint.cfm>

Or, contact HUD:

SOUTHWEST OFFICE
Fair Housing Hub
U.S. Dept. of Housing and Urban Development
801 North Cherry, 27th Floor
Fort Worth, TX 76102
Telephone (817) 978-5900 or 1-888-560-8913
Fax (817) 978-5876 or 5851 • TTY (817) 978-5595
E-mail: Complaints_office_06@hud.gov

Or, contact the Texas Workforce Commission Civil Rights Division:

Texas Workforce Commission
Civil Rights Division
1117 Trinity Street, Rm. 144-T
Austin, Texas 78701
888-452-4778
http://www.twc.state.tx.us/crd/file_hsg.html

Study Description

The Analysis of Impediments to Fair Housing Choice Update

This Analysis updates that the original analysis to coincide with the City of Bryan's 2015-2019 Consolidated Plan. The study was performed in order to satisfy the requirements of 24 CFR 91.225(a)(1) titled "Certifications", which states:

"*Affirmatively furthering fair housing.*" Each jurisdiction is required to submit a certification that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard." This update was performed to meet that requirement.

Impediments to fair housing choice are considered by the U.S. Department of Housing and Urban Development (HUD) to be any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices. The Analysis of Impediments is not directly approved by HUD, though a summary of its content is a required component of the City's Consolidated Plan. HUD asks that the Analysis of Impediments (AI), serve as the substantive, logical basis for fair housing planning; Provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and assist in building public support for fair housing efforts both within a City's boundaries and beyond. This analysis must be updated every three to five years.

Study Observations and Recommendations Summary

Observations and Recommendations

- **Observation 1 :** There have been 15 discrimination complaints made during the 2010-2014 period, all but one of which related to discrimination in rental. Of the 14 rental cases, 13 of these were related to discrimination based upon rental terms, conditions, acts, refusal, or facilities. The primary basis for discrimination complaints was race (35%), followed by disability (30%). There was one case regarding terms of sale which alleged discrimination based upon national origin. All cases were found to be without cause, withdrawn, conciliated, or administratively closed. The number of discrimination complaints decreased from the 2005-2009 period, when there were 19 complaints in Bryan. The decrease represents a 21% decrease in discrimination complaints over the prior evaluation period.

Recommendation: Continue fair housing educational and outreach activities through public service announcements to ensure a greater distribution of bilingual materials on the Internet (City website, YouTube), in the public library and through public service radio and television ads and outreach, especially on Spanish-language radio stations, that inform citizens on their rights and how to file complaints about housing discrimination. Provide educational information to City boards, such as the City's Community Development Advisory Committee, on fair housing education and outreach, provide information in community forums such as quarterly Partnership board meetings (whose 80 non profits members serve primarily low/moderate income clients), health fairs and coalition groups such as the local Brazos Valley Coalition for the Homeless.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative and City of Bryan Public Communication General Funds.

- **Observation 2:** Most dilapidated housing is located in low to moderate income areas based upon housing condition data collected in April, 2015.

Recommendation 1: Continue rehabilitation and reconstruction programs and particularly target clusters of dilapidated housing in low-moderate income minority areas, as well as work to identify target areas where the City's Capital Improvements Project funding can be effectively leveraged with federal grant funds.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative and project funds.

Recommendation 2: Continue to market the housing rehabilitation and reconstruction programs, especially in low and moderate income areas through public service announcements outreach efforts in print media as well as the internet (City website, YouTube), radio, and television.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds, and City of Bryan Public Communication General Funds.

- **Observation 3:** A review of advertising indicates that local housing providers, lenders, and insurers are generally diligent to include fair housing logos, disclosures, and diverse human models. However, bilingual advertising of housing availabilities and mortgage loans is lacking in the area, even though the Hispanic demographic is more than a third of the population of Bryan.

Recommendation 1: Continue to regularly review and evaluate advertising for housing providers, lenders, and insurers in the local area. Provide an annual forum for local housing providers and associated fields to provide an open dialogue on local fair housing issues and concerns, and encourage more extensive bilingual advertising by housing providers and lenders.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.

Recommendation 2: Continue fair housing educational and outreach activities targeted toward housing providers, lenders, and insurers through local associations to increase non-discrimination awareness by public service announcements, website education, and community meetings such as the City’s Community Development Advisory Committee meetings.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.

- **Observation 4:** The City of Bryan zoning and land use policies discourage development of large, high-density multifamily developments, particularly those concentrated in areas the City is interested in improving with retail or other economic development activity, or in maintaining neighborhood integrity. In addition, the City promotes scattered site, low-density low-moderate income housing rather than concentrated affordable housing. Such efforts are important to limiting the concentration of poverty in the City.

- **Recommendation 1:** Continue to monitor development activity such as rezoning applications, building permits, and Housing Tax Credit development applications, and provide technical assistance to developers.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.

- **Observation 5:** Current limits on the numbers of occupants in a single family dwelling likely meet the test of reasonableness under the Fair Housing Act, although some Residential Conservation District R-NC zoning by individual neighborhoods (slightly more than 2,000 homes) allows only 2 unrelated adult residents, maximum. This zoning classification could be found not to meet the test of reasonableness under the Fair Housing Act.

Recommendation 1: Continue to monitor case law in relation to this zoning classification.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.

Recommendation 2: Continue to monitor proposed changes to City ordinances and provide feedback to relevant committees and staff members regarding potential conflict with any fair housing laws.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.

- Observation 6:** While no local policies were identified as barriers to affordable housing, the upcoming implementation of the Integrated Mortgage Disclosures under the Real Estate Settlement Procedures Act (Regulation X) and the Truth In Lending Act (Regulation Z) by the Consumer Financial Protection Bureau (CFPB) will have the potential to negatively affect housing affordability and availability. Sections 1098 and 1100A of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) when implemented beginning August 1, 2015 (Proposed to be delayed until October 3, 2015), will revise rules which apply to most mortgage transactions. Real Estate industry professionals anticipate that these new requirements will significantly extend the time required to close for financed purchases, which will result in cash investor purchasers having an even greater advantage in the marketplace over financed homebuyers, especially in the lower-end housing price ranges.

Recommendation 1: Continue to monitor implementation of the Integrated Mortgage Disclosures rules on affordable housing and loan availability for low income homebuyers.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.
- Observation 7:** According to HMDA data, Black applicants’ incidence of conventional loan denial is higher than their percentage of their population as a whole and most often due to poor credit history ratings.

Recommendation 1: Continue to counsel minority Down Payment Assistance applicants regarding credit education and submission of loan applications only when likely to receive approval from the lender.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds, and HOME housing project funds (Down Payment Assistance).

Recommendation 2: Continue to promote Homebuyer Counseling Training to minority applicants

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.

Recommendation 3: Continue to engage local mortgage lenders through local committees such as the City’s Brazos Valley Bank on It program, organizations, and other appropriate venues to promote lending to minority applicants.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.
- Observation 8:** Hispanics and Blacks have higher incidences of government insured loan denials due to excessive debt and inadequate collateral, respectively.

Recommendation 1: Continue to counsel minority Down Payment Assistance applicants regarding credit education and submission of loan applications only when likely to receive approval from the lender.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds, and HOME housing project funds (Down Payment Assistance).

Recommendation 2: Continue to promote Homebuyer Counseling Training to minority applicants

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.

Recommendation 3: Continue to engage local mortgage lenders through local committees such as the City’s Brazos Valley Bank on It program, organizations, and other appropriate venues to promote lending to minority applicants.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.

- Observation 9:** Both Black and Hispanic applicants experience higher refinance loan denial percentages as compared to their respective percentages of the population as a whole. Poor credit history rating remains the primary reason for loan denials for these minority populations.

Recommendation 1: Continue to counsel minority Down Payment Assistance applicants regarding credit education and submission of loan applications only when likely to receive approval from the lender.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds, and HOME housing project funds (Down Payment Assistance).

Recommendation 2: Continue to promote Homebuyer Counseling Training to minority applicants

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.

Recommendation 3: Continue to engage local mortgage lenders through local committees such as the City’s Brazos Valley Bank on It program, organizations, and other appropriate venues to promote lending to minority applicants

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.
- Observation 10:** Data indicates that both Black and Hispanic applicants for home improvement loans experience high denial rates due, primarily, to poor credit history ratings.

Recommendation 1: Continue to counsel minority Down Payment Assistance applicants regarding credit education and submission of loan applications only when likely to receive approval from the lender.

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds, and HOME housing project funds (Down Payment Assistance).

Recommendation 2: Continue to promote Homebuyer Counseling Training to minority applicants

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.

Recommendation 3: Continue to engage local mortgage lenders through local committees such as the City’s Brazos Valley Bank on It program, organizations, and other appropriate venues to promote lending to minority applicants

Completion Date: September 30, 2016 (ongoing, thereafter), with quarterly assessments.

Source of Funds: Community Development Budget CDBG – Administrative funds.

Actions to Affirmatively Further Fair Housing

- City adopted a Fair Housing ordinance, CHAPTER 58, ARTICLE II. DISCRIMINATION: FAIR HOUSING, Sec. 58-40, to ensure fair housing options are available to its citizens.
- Posters & literature continued to be displayed and made available at city office buildings and the public library, and have been made available to partnering entities, such as: city funded Public Service Agencies and the Council of Governments.
- Outreach activities and public service announcements to improve public Fair Housing awareness to City boards, such as the City’s Community Development Advisory Committee, Community Partnership board meetings (whose 80 nonprofit members serve primarily low/moderate income clients), and neighborhood associations.

- Joint efforts to produce and distribute a housing assistance provider database and a rental database for accessible housing with the Texas A&M University Center on Disability and Development, Brazos Valley Council of Governments, City of College Station, Brazos Valley Affordable Housing Corporation, and others.
- City staff has monitored all city-sponsored projects for equal access and compliance of the Fair Housing Act.
- City Building Inspection officials have monitored code compliance to Fair Housing and Equal Access Standards.
- Annual Public Hearings and Public Meetings were held providing information and requesting public comment on fair housing or related issues during the 2010-2014 fiscal years. The efforts are held in ADA accessible facilities in a variety of locations to ensure the maximum feasible accessibility to the public.
- Down-payment and closing cost program assistance made available city-wide to eligible homebuyers by the Community Development Services Department and other local housing services providers.
- Homebuyer and homeowner education including fair housing information is provided by the city and other local housing services providers.
- City sponsored acquisition and new construction program efforts underway to increase affordable housing opportunities locally.
- The Community Development Services Department has made outreach efforts to for-profit and non-profit builders and developers through funding and technical assistance to increase the supply of decent, affordable housing within low to moderate income neighborhoods as well as creation of affordable housing on a city-wide basis.
- The City maintains an Affirmative Marketing Plan to directly market newly-developed City-assisted housing units to minority groups least likely to apply.
- Community Development Services staff have met with local lenders through the Bank On Brazos Valley Program to encourage the use of non-traditional client loan qualifying and loan products to better serve the needs of homebuyer households with challenges that preclude conventional qualification.
- Annual Fair Housing outreach is conducted to participating contractors at breakfast meetings promoting FHEO topics during the NCDA CDBG week.
- Fair Housing materials and presentation is provided to new Section 8 rental landlords during orientation jointly with the City of College Station and Council of Governments.
- Fair Housing materials and presentation is provided periodically to homeless shelter caseworkers jointly with the City of College Station.
- Community Development Services staff have conducted public outreach regarding availability of housing and housing assistance, including Spanish-language radio broadcasts, translation of housing

application materials into Spanish, and maintains bi-lingual staff in order to assist applicants and clients with Limited English Proficiency (LEP).

Results

All City of Bryan-assisted developments are currently in compliance based upon Community Development Services Department monitoring review records. The supply of affordable housing available in low to moderate income areas and citywide has been increased through the activities of the department. The Building Inspections Division has used the Fair Housing Act of 1968 and the 1994 Americans with Disabilities Act as a standard of compliance for building plans review and code compliance. No complaints have been filed with the City Attorney's office under the City of Bryan Fair Housing Ordinance as of July 24, 2015. For the 2010-2014 period, there have been 15 complaints made to HUD and/or the State of Texas Workforce Civil Rights Commission regarding discrimination in the City of Bryan. From the 2010-2014 Consolidated Plan Community Needs Assessment, 7% of surveyed respondents expressed a problem with discrimination. Analysis indicates that significantly more than expected respondents experienced problems in buying or renting property due to inability to afford rent/payments, inability to get a loan, a lack of down-payment resources, and credit difficulties.

Research Objectives

The Analysis of Impediments (AI) update has three major objectives:

- ◆ Identify impediments to fair housing choice within the City of Bryan
- ◆ Recommend appropriate actions to overcome the effects of identified impediments
- ◆ To serve as a formal record

Sources and Methods

This study utilized data from a variety of sources, to include but not limited to: the U.S. Census Bureau, the Real Estate Center at Texas A&M University, the Bryan/College Station Association of Realtors Multiple Listing Service, the City of Bryan Community Development, Geographic Information Systems, and Planning and Development Services Departments, the Brazos County Appraisal District, FFIEC, the Bryan Economic Development Corporation, and the 2015 Community Needs Assessment Survey.

National, State and Local Fair Housing Laws Summary

National Fair Housing Laws

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

The Federal Fair Housing Act, of 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender/sex, familial status and handicap (disability). The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing units sold or rented without the use of a real estate agent or

broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons. HUD has the primary authority for enforcing the Federal Fair Housing Act.

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

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

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

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

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

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

Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 11246 bars discrimination in federal employment because of race, color, religion, sex, or national origin.

Executive Order 12892, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally conducted programs and activities.

Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

State of Texas Fair Housing Laws

Texas Fair Housing Act Texas Property Code, Title 15, Fair Housing Practices, Chapter 301 provides rights and remedies substantially equivalent to those granted under federal law.

Local Fair Housing Laws

City of Bryan Fair Housing Ordinance (See Attached CHAPTER 58, ARTICLE II. DISCRIMINATION: FAIR HOUSING, Sec. 58-40) prohibits discrimination in housing sales, rentals, brokerage, or financing with the City of Bryan because of race, color, sex, religion, or national origin.

Activities Utilizing CDBG Funding to Affirmatively Further Fair Housing

Funding of fair housing activities. The City of Bryan funds the following fair housing activities using CDBG funding:

- Presentation and dissemination of fair housing material at Community Development public meetings and outreach events such as:
 - Section 8 Voucher New Landlord Orientation (Jointly with the City of College Station and Council of Governments).
 - Annual all Neighborhood Associations Meeting
 - Down Payment Assistance Client Intake Meetings
- Conducts periodic surveys of the public, local housing industry and agencies to identify issues involving housing discrimination in the community
- Web and print public needs assessment surveys are conducted annually regarding Fair Housing
- Conducts periodic reviews of advertising media to document any nondiscriminatory practices

CDBG funding of fair housing activities by others. The City of Bryan accepts applications for CDBG funding from eligible public service agencies, including agencies working to further fair housing.

In-kind contributions in support of fair housing. The following are in-kind contributions in support of fair housing provided by the City of Bryan:

- Webpage link to the Department of Housing and Urban Development and fair housing information: <http://www.bryantx.gov/community-development/#fairhousing>
- Participates in the Texas State Affordable Housing Corporation (TSAHC) counselor connection which provides homebuyers education access to potential purchasers, with information about the home buying process, including fair housing
- Display of the Fair Housing Poster prominently throughout the Community Development office, and use of the Fair Housing logo on all promotional materials
- Outreach efforts to for-profit and non-profit builders and developers through funding and technical assistance to increase the supply of decent, affordable housing within low to moderate income neighborhoods as well as creation of affordable housing on a city-wide basis.
- The City maintains and utilizes an Affirmative Marketing Policy process to directly market newly-developed City-assisted housing units to minority groups least likely to apply.

- Community Development Services staff have met with local lenders and home builders to encourage the use of non-traditional client loan qualifying and loan products to better serve the needs of homebuyer households with challenges that preclude conventional qualification.
- Community Development Services staff have conducted public outreach regarding availability of housing and housing assistance, including Spanish-language radio broadcasts, translation of housing application materials into Spanish, and maintains bi-lingual staff in order to assist applicants and clients who are not English-proficient.

Evaluation of activities utilizing CDBG funding. Analysis of public hearing comments and survey data regarding fair housing activities finds continued emphasis on continuing fair housing presentations to the public and building public awareness of fair housing continues to be effective in increasing awareness. For the 2010-2014 period, there have been 15 complaints made to HUD, and no complaints made to the State of Texas regarding discrimination in the City of Bryan. From the 2010-2014 Consolidated Plan Community Needs Assessment, 7% of surveyed respondents expressed a problem with discrimination. Analysis indicates that significantly more than expected respondents experienced problems in buying or renting property due to inability to afford rent/payments, inability to get a loan, a lack of down-payment resources, and credit difficulties.

No applications for non-profit Public Service Agency CDBG funding were received by organizations working to further fair housing in the previous plan period, however the Homebuyer Education Coalition in which Community Development Services staff participate has provided Fair Housing and housing education and counseling to an average of 20 households per year who have successfully become homeowners.

Use of the Affirmative Marketing Policy and Spanish-language outreach has served to increase the number of inquiries and applicants for the City's housing programs, and local for-profit and non-profit homebuilders have successfully increased the supply of decent, affordable housing available in both low to moderate income neighborhoods and city-wide as a result of the City's outreach and technical assistance.

Affirmative Marketing Policy and Procedures (See Appendix-F)

In accordance with Home Program regulations and in furtherance of the City's commitment to non-discrimination and equal opportunity in housing, the City of Bryan has established procedures to affirmatively market units constructed or rehabilitated through the City's affordable housing programs. These procedures are included in Appendix-F of this Analysis of Impediments. In summary, the City believes that individuals of similar economic levels in the same housing market area should have available to them a like range of housing choices regardless of their race, color, religion, sex and national origin.

The City is committed to affirmative marketing, which will be implemented in housing programs through procedures that the City and participating owners will follow. These goals are reached by informing the public, potential tenants and owners about Federal Fair Housing Laws and Affirmative Marketing Policies and informing persons of all racial, ethnic and gender groups about unit availability. The City will also attract and solicit applications for assistance from persons not likely to apply without special outreach.

The City has identified African American and Hispanic households as two groups in the local housing market who would likely not apply for the units without special outreach. Having identified these two

groups, the Community Development Services Department will undertake special outreach methods to enhance minority awareness of the city's affordable housing programs.

For the African American community, the City will contact the churches serving that community in the neighborhood of the development, and request that these organizations inform members of their organizations about the availability of newly-developed housing units and housing assistance programs. Likewise, the City will contact churches serving the Hispanic community in neighborhoods with development activity and the local LULAC group in order to request that these organizations inform members of their organizations about the availability of newly developed housing units and housing assistance programs.

The City will keep records of racial, ethnic and gender characteristics of home buyers, homeowners and applicants for a minimum of five years following project completion and will maintain copies of advertisements and other efforts of special outreach. The City will also require that organizations receiving federal housing funds through the Community Development Services Department also keep records of how available properties were marketed.

Finally, the City will conduct assessments and corrective actions, as needed, to gauge the effectiveness of affirmative marketing efforts and will review information related to procedures and successes in encouraging minority participation in its affordable housing programs. To determine results, the City will examine whether or not persons from the African American and Hispanic groups applied for or became tenants or owners of units that were affirmatively marketed. If it is found that they are represented, the City will assume our procedures were effective.

The City will carry out assessment activities and complete a written assessment of affirmative marketing efforts to be included in the annual performance report to HUD. This assessment will cover marketing relative to units constructed or rehabilitated and first made available for occupancy during that year. Owners, builders and developers offering properties assisted by the City of Bryan Community Development Services Department are required to comply with the City's affirmative marketing requirement on all units sold under the program, to include:

- Corresponding with various community organizations, employment agencies, churches, etc. in order to accomplish special outreach to those not likely to apply for housing in the available properties.
- Utilizing the fair housing logo on all printed advertisements and prominently in the business office.
- Providing fair housing brochures to prospective tenants informing them of fair housing laws and the City's Affirmative Marketing Policy.

The City of Bryan also affirmatively solicits and encourages submittal of project bids by small and minority firms, women's business enterprise and labor surplus area firms. In order to promote maximum participation by small and minority business, and women's business enterprises, bids may be divided into smaller quantities or the delivery schedule altered to accommodate the capacity of such firms. If the prime contractor lets to subcontracts, the prime contractor is required by the City to take the following affirmative steps:

- Placing qualified small and minority business enterprises on solicitation lists
- Assuring that small and minority businesses are solicited whenever they are potential sources

- Dividing total requirements, when economically feasible to permit maximum participation by small and minority business and women’s business enterprises
- Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business, and women’s business enterprises
- Using the services of the Small Business Administration
- and the Minority Business Development Agency of the Department of Commerce

Analysis of Local Housing Market and Business Practices

Community Needs Survey Summary

In February and March, 2015, the City solicited input from citizens, agencies and public offices. The 15-page survey asked questions regarding housing needs, health and human services, fair-housing and discrimination issues, special needs, infrastructure and public facility needs, and economic development needs. Online surveys and mailings were used, as well as newspaper notices, workshops, public hearings, TV/radio, website and YouTube postings. English and Spanish were used in outreach. Groups include: local/regional agencies, elected officials, city offices, neighborhood associations, state agencies, churches, schools and civic groups. The online Community Needs Assessment received 94 responses. The Priority Needs Survey was mailed and online and received 37 responses. The Service Provider Survey garnered over 20 completed responses, primarily from 2 Agency Workshops sponsored by Bryan and College Station.

The surveys, available online, solicited input on current eligible activities, to include housing and non-housing subjects. Housing questions involved: supply, energy efficiency, discrimination, repair, and buying/renting. Non-housing questions covered: public facilities; public services; and economic development. Current programs include: housing rehabilitation, reconstruction and minor repair; homebuyer assistance; clearance/demolition; public facilities/infrastructure improvements; and public service agency programs. All currently administered activities were rated as important or very important by over 60 percent of respondents. Regarding housing discrimination, a large majority reported that local housing was available, regardless of race, color, gender, national origin, religion, marital status, family size and age. The class listed as the most likely to experience limited availability of housing was persons with disabilities. A low percentage of survey participants reported experiencing discrimination based on: claiming property not available; refusal to sell or rent; and only selected homes or neighborhoods shown.

Advertising policies and practices:

42 U.S. Code § 3604 (c) codifies that it shall be unlawful to “make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on membership in a protected class, or an intention to make any such preference, limitation or discrimination”.

- The City of Bryan Community Development Staff reviewed six months of real estate sale and rental advertisements published in the local newspaper of record, The Bryan/College Station *Eagle* from January through June, 2015 to ascertain that prohibited terminology was not used, that no preferences concerning protected classes were evident, and that models were of diverse groups.

- The real estate classified section properly contains an equal housing opportunity notice, and no overtly discriminatory advertisements or use of prohibited terms was found.
- Based on this review, there is judged to be no impediments to fair housing with regard to newspaper advertising in Bryan.
- Radio and television advertising were also monitored during this period. Cox Cable channel 11 is exclusively devoted to ads for home sales. These were reviewed, and the narratives and photos were found to be non-discriminatory.
- Since 2010, no complaints have been made regarding discriminatory advertising.

Homeowners Insurance: No studies have indicated impediments to fair housing existing in the Bryan homeowners insurance market.

- Advertising: A review of the homeowners insurers advertising in the Verizon yellow pages indicates no discriminatory practices. The yellow pages are the predominant advertising medium for insurance companies in the area.
- Affirmative marketing: Ads generally have no pictures, other than some with agents' photos, and some have equal housing opportunity logos and also advertise services in Spanish. It is noted that no minorities appear in the advertisements, and it is recommended that ads using pictures include minority models.
- Location of Agents/Offices: There are 78 insurance agents and offices offering insurance services in Bryan, according to the Verizon Yellow Pages. Review of the business locations show that they are distributed primarily along major thoroughfares, without regard to racial concentrations. Several offices are located nearby neighborhoods of racial concentration.
- Policies: No studies indicate discrimination on the basis of (i) age, (ii) geographic marketing, or (iii) value/replacement cost to values by insurers in Bryan.

Lending: No discrimination complaints have been filed regarding fair lending practices.

- Advertising: A review of the mortgage lenders advertising in the Verizon yellow pages indicates no discriminatory practices. Ads generally have no pictures, other than some with staff photos, and most have equal housing opportunity logos or text indicating they are fair housing lenders. It is recommended that ads using pictures include minority models. It is also recommended that ads include Spanish language, since Bryan is now more than one-third Hispanic. A review of lenders internet webpage advertising indicates that some smaller lenders have not included an equal housing opportunity logo or statement on their websites. It is recommended that these lenders receive fair housing outreach education efforts.
- Affirmative marketing programs: There are no affirmative marketing programs on file from lenders.
- Location of Branches/Offices: There are 26 local branch mortgage lenders reporting that they originate loans Bryan, according to FFIEC/FDIC data. Local lenders are distributed primarily along major thoroughfares, without regard to racial concentrations.
- Evaluation and Analysis of HMDA Data: HMDA data is reported for the combined Bryan/College Station MSA. Separate City of Bryan only data is not available.

2013 FFIEC HMDA Data Tables
for
Disposition of Applications for Conventional, Government Insured, Refinance and Home Improvement Loans

Conventional Loan Denials by Race / Ethnicity - B/CS MSA			
Race / Ethnicity	% Denials	% in MSA	Top 2 Reasons
White	11.0%	75.4%	23% Credit / 18% Debt-to-Income
Black / African American	42.5%	11.6%	50% Credit / 25% Other
Hispanic / Latino	22.2%	230%	34% Credit / 18% Other

Total Applicants	% Denials	% in MSA
2,990	11.9%	100.0%

Source: 2013 FFIEC HMDA Data

Observation: HMDA data indicates that Black applicants' incidence of conventional loan denial is approximately 31% higher than their percentage of their population as a whole. The large majority (50%) of denials for Black applicants were because of poor credit history ratings. This data suggest that consumer credit counseling and homebuyer education should be a priority in the assistance provided by the city and other local housing assistance providers, and should be affirmatively marketed to minority populations.

FHA / VA / FSA / RSA Loan Denials by Race / Ethnicity - B/CS MSA			
Race / Ethnicity	% Denials	% in MSA	Top 2 Reasons
White	10.8%	75.4%	33% Credit / 28% Debt-to-Income
Black / African American	13.5%	11.6%	100% Credit
Hispanic / Latino	12.4%	23.0%	37% Credit / 26% Debt-to-Income

Total Applicants	% Denials	% in MSA
934	11.5%	100.0%

Source: 2013 FFIEC HMDA Data

Observation: The higher incidence of government insured loan denials by Black applicants, wholly due to poor credit history ratings, indicates that consumer credit counseling and personal budgeting education would be warranted, particularly for minority populations. A noted high percentage of loan denials for Hispanic applicants due to poor credit history ratings (37%), suggests that down-payment and closing costs assistance should continue to be a component of homebuyer programs targeted at lower-income homebuyers.

Refinance Loan Denials by Race / Ethnicity - B/CS MSA			
Race / Ethnicity	% Denials	% in MSA	Top 2 Reasons
White	16.8%	75.4%	19% Other / 18% Debt-to-Income
Black / African American	30.1%	11.6%	41% Credit / 21% Other
Hispanic / Latino	25.5%	230%	29% Credit / 20% Debt-to-Income

Total Applicants	% Denials	% in MSA
3,458	18.1%	100.0%

Source: 2013 FFIEC HMDA Data

Observation: According to HMDA data, Black applicants experience 18.5% higher refinance loan denial percentages as compared to the percentage of the population as a whole. Poor credit history rating remains the primary reason for loan denials (41% for Blacks and 29% for Hispanics), suggesting that consumer credit counseling and personal budgeting education should be a priority in the assistance provided by the city and other local housing assistance providers, and should be affirmatively marketed to minority populations.

Home Improvement Loan Denials by Race / Ethnicity - B/CS MSA			
Race / Ethnicity	% Denials	% in MSA	Top 2 Reasons
White	33.1%	75.4%	51% Credit / 24% Debt-to-Income
Black / African American	69.2%	11.6%	86% Credit / 10% Debt-to-Income
Hispanic / Latino	77.8%	230%	59% Credit / 26% Debt-to-Income

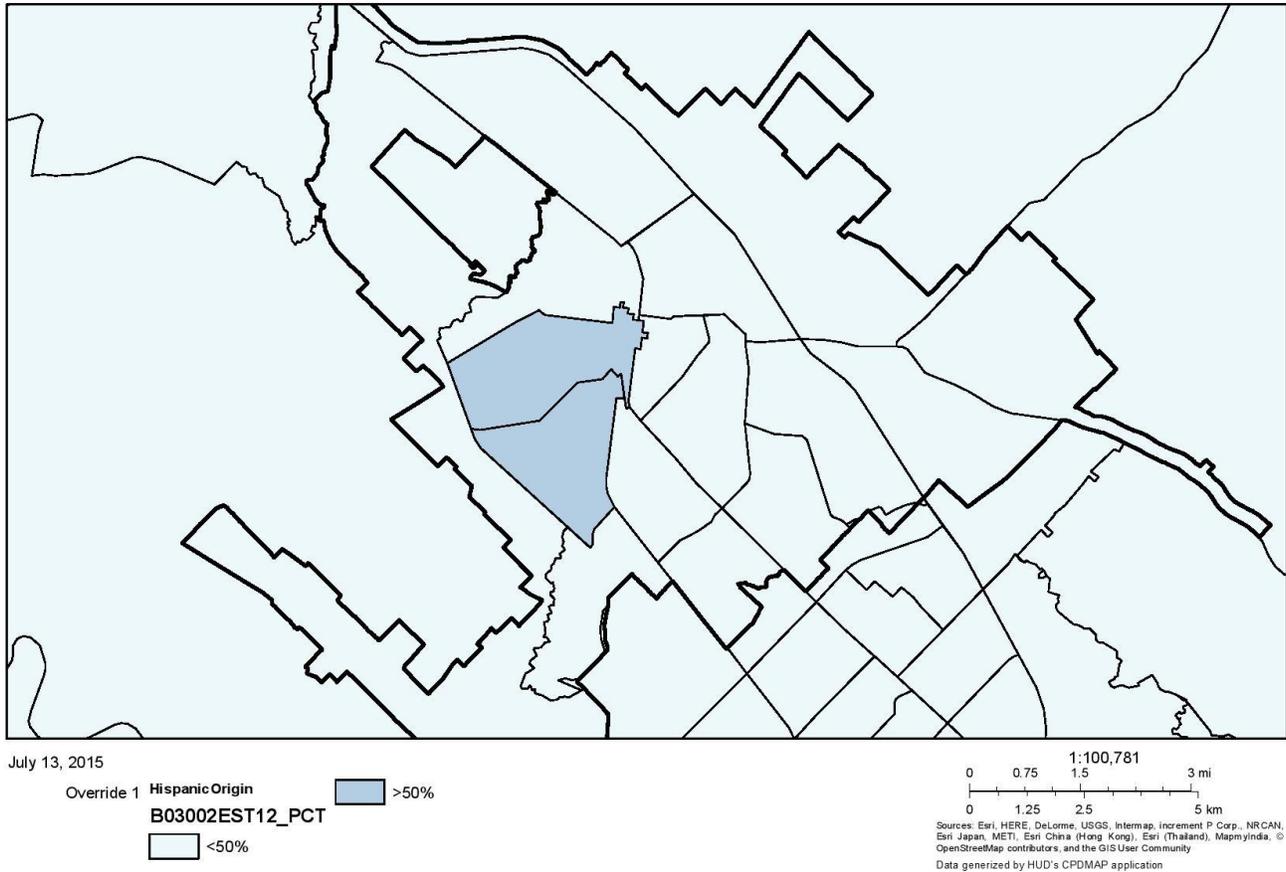
Total Applicants	% Denials	% in MSA
379	38.0%	100.0%

Source: 2013 FFIEC HMDA Data

Observation: HMDA data indicates that both Black and Hispanic applicants for home improvement loans experience very high denial rates as demonstrated in the table above. Denials are due, primarily, to poor credit history ratings (86% for Blacks and 59% for Hispanics). Loan denial percentages, as compared to respective percentages of the population as a whole, are 57.6% and 54.8% higher for Blacks and Hispanics, respectively. This data suggests that consumer credit counseling and homeowner education should be a priority in the assistance provided by the city and other local housing assistance providers, and should be affirmatively marketed to minority populations.

Areas of Minority Concentration

Census Tract - Where Hispanics Comprise over 50% of Population



The only area of minority concentration is an ethnic Hispanic concentration on the City's northwest side. Hispanics make up more than 50% of these census tracts, and more than 36 percent of the general population. This area also has a significant concentration of substandard housing, and is a low-income area. Encouraging redevelopment of older housing which is beyond its useful life should be encouraged, as well as development of additional new, safe, decent, and affordable housing.

Rental Housing: Rental housing has been and continues to be of primary concern, as this housing type originates most fair housing complaints in Bryan.

- **Advertising:** A review of advertising by rental housing providers indicates no overtly discriminatory practices, however, it should be noted that only a small minority of providers utilize the equal housing opportunity logo in their advertising, although most websites do contain the EHO logo. A diversity of human models is now noted, a practice which has evolved from previous evaluation periods which noted primarily non-minority human models. However, usually omitted from advertising and websites are any references to units available for disabled residents, and limited Spanish language advertisements.
- **Steering based on protected class status:** There is no indication of steering based upon protected class status in the rental housing market in Bryan.

- **Affirmative Marketing Programs:** The City of Bryan has not participated in a rental development of five or more units, and has not received documentation of any affirmative marketing programs. However, in the future, if the city participates in a development of five or more units, an affirmative marketing plan will be required.

Sale of Existing Housing

- **Steering based on protected class status:** There is no evidence of steering the sales market. The local Regional Association of Realtors conducts regular training programs regarding non-discrimination.
- **Advertising:** A review of advertising by rental housing providers indicates no overtly discriminatory practices. Many Realty companies display the equal housing logo on their printed advertisements, however many do not. Almost all do display the logo on their websites, however. Most photographs and pictures in printed material do incorporate diverse models.
- **Affirmative Marketing Programs/VAMAs:** VAMAs are required for federally insured or assisted housing units. However there is not a centralized, accessible database to determine if any have been submitted to HUD.

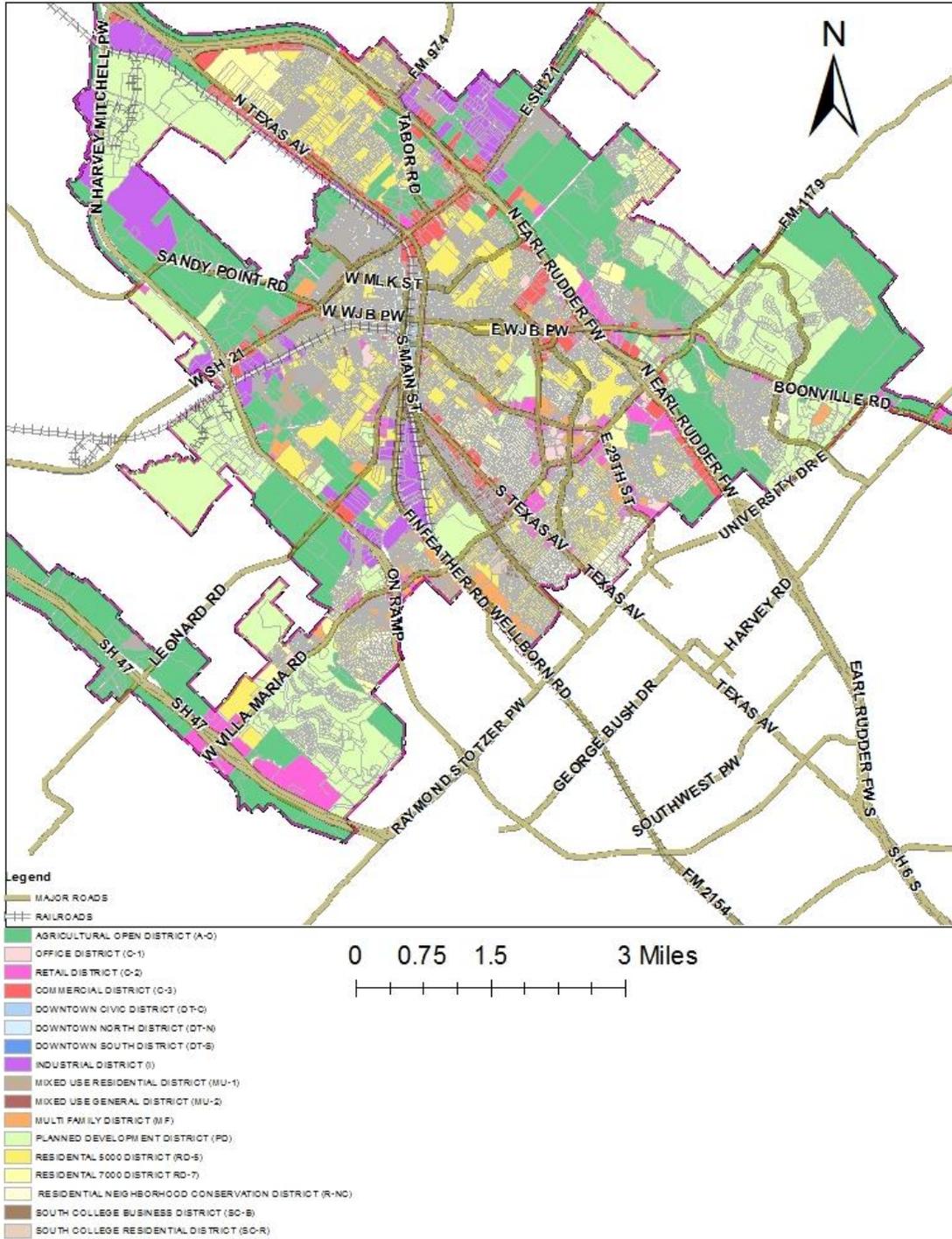
Zoning: The City of Bryan's policies and guidelines for single-family and multifamily housing are discussed in the Comprehensive Plan and also in other ordinances passed by the City Council. A review of the City's policies and guidelines did not reveal any impediments to fair housing choice for any protected class. See the following table of zoning classifications:

The following zoning districts have been established in the City of Bryan:

Abbreviated Designation	Zoning District Name
A-O	Agricultural-Open District
RD-7000	Residential District - 7000
RD-5000	Residential District - 5000
MF	Multiple-family District
DT-N	Downtown North District
DT-S	Downtown South District
DT-C	Downtown Civic District
SC-B	South College Business
SC-R	South College Residential
C1	Office District
C2	Retail District
C3	Commercial District
I	Industrial District

Abbreviated Designation	Special Purpose District Name
HP	Historic Preservation Overlay District
PD	Planned Development District
CO	Corridor Overlay District
MU-1	Mixed Use Residential District - 1
MU-2	Mixed Use District - 2 (General)
R-NC	Residential Neighborhood Conservation District

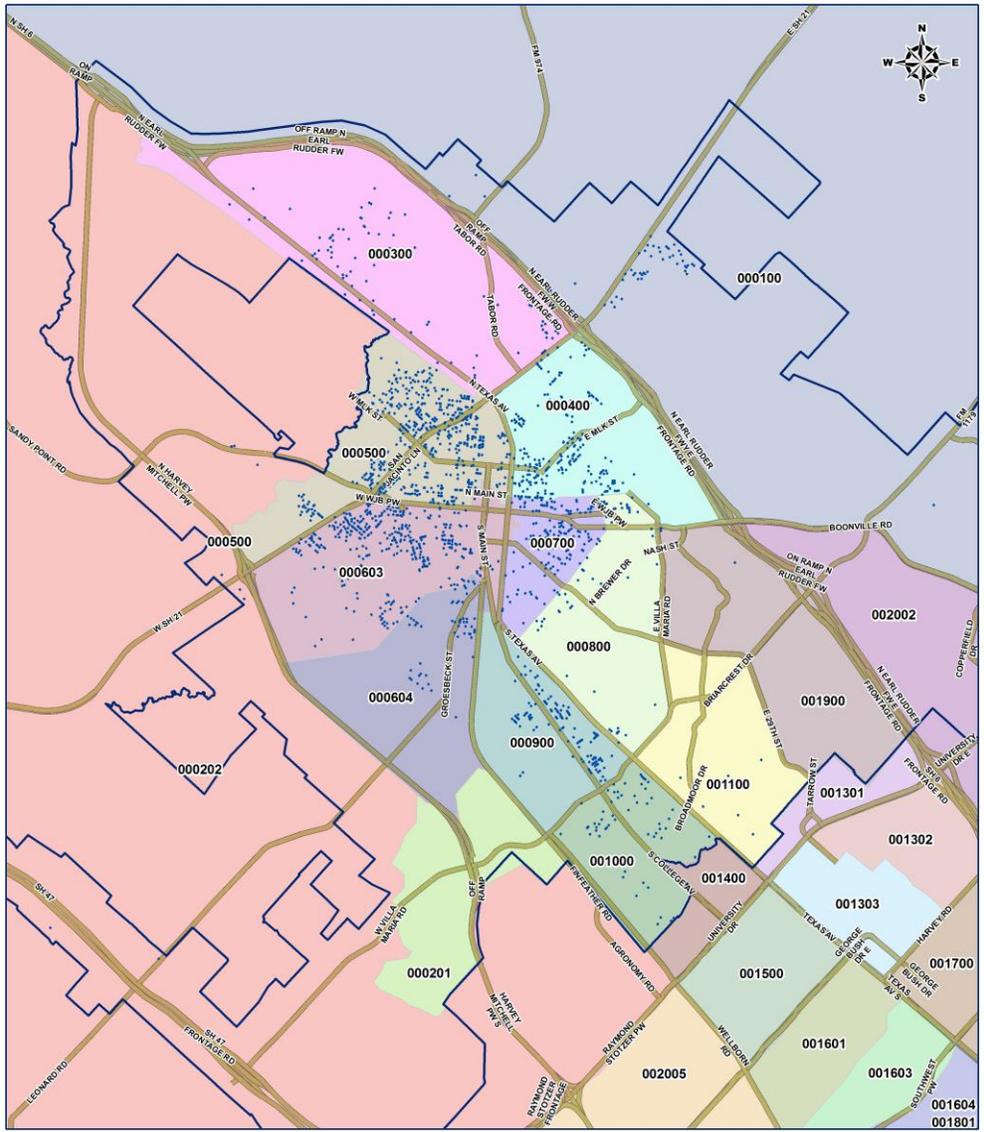
City of Bryan Zoning Map



There exists a variety of zoning classifications and designations suitable for housing, with sufficient amounts of suitably-zoned property to accommodate various housing developments, from manufactured homes, single family, duplex, multifamily, mixed use, and planned developments. There is also a significant area of undesigned (Agricultural-Open), which could be rezoned to

residential development. There have been several successful Low Income Housing Tax Credit Developments in the City of Bryan, and many proposals for these developments, indicating that there is a sufficient supply of properties suitable for multifamily development.

- Group homes: Group homes are allowable by Conditional Use Permit or in multifamily-zoned districts. There are two (2) current group homes in Bryan.
- Familial status: Currently, the limit of unrelated occupants in a residential dwelling is set at four persons, though a Residential Conservation District allows only 2 unrelated adults.
- Substandard housing distribution:



Substandard Housing Distribution



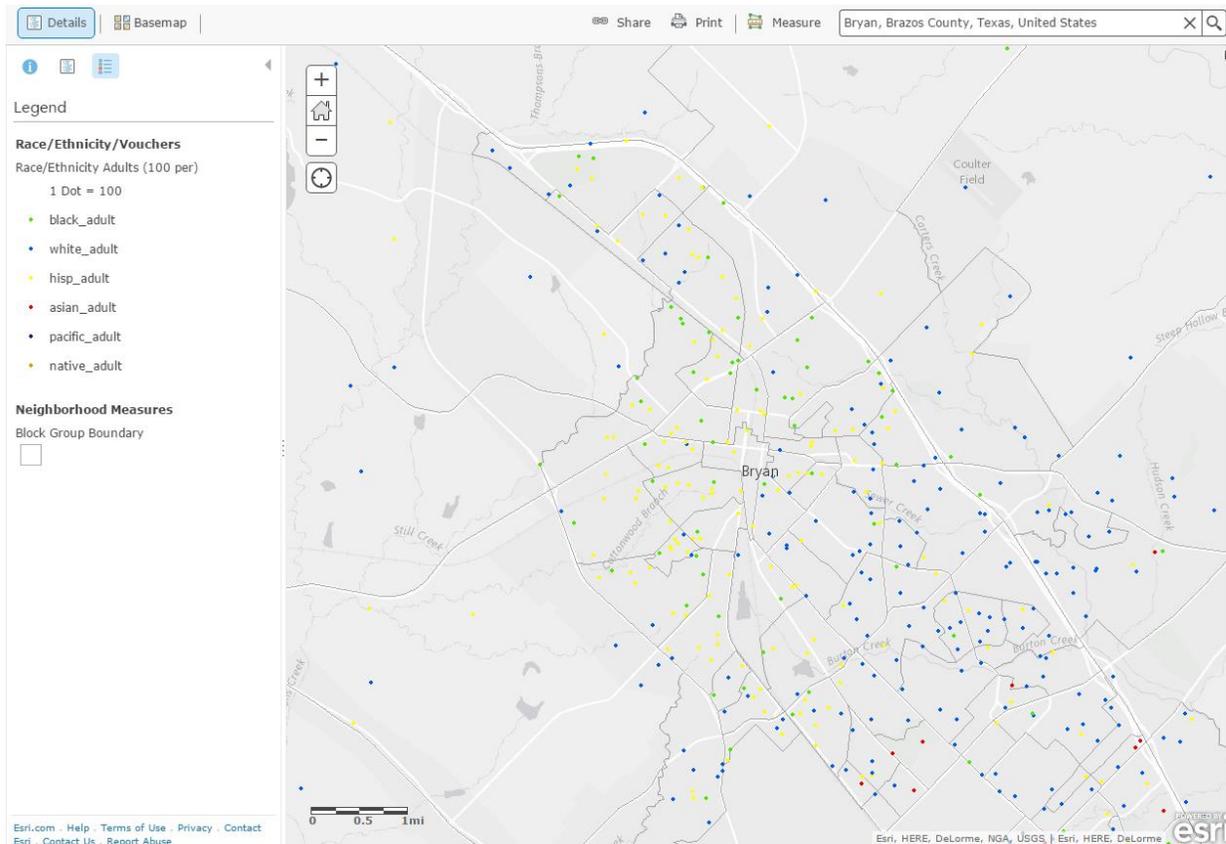
Distribution of Substandard Housing

According to an internal study of Brazos County Appraisal District (BCAD) data, an estimated 1,664 single-family units in Bryan are substandard and in need of renovation or rehabilitation. These units are primarily concentrated in the older, low-income areas of the City, primarily in the central/north area surrounding downtown.

Dilapidated properties are deemed not suitable for rehabilitation because the costs to bring the property to code standards exceed 50% of the after-rehabilitation appraisal. These properties are generally vacant, have structural failure, lack safe plumbing and electrical systems and pose health and safety threats. It is estimated that approximately 162 dilapidated structures remain within Bryan city limits. In Bryan's 2005 Consolidated Plan, an estimated 889 dilapidated residential units were reported. In 2010 a reported 376 dilapidated units represented a 57.7% decrease in these units. In 2015, the currently estimated 162 dilapidated units represent a 56.9% decrease over the previous five years. This continued reduction results from both city and private owner efforts to address neglected properties.

The City should continue to maintain policies and programs to encourage rehabilitation of structures which are feasible to preserve, and remove those which are not.

- **Distribution of Housing Vouchers, Fair Housing Equity Analysis**



- The intent of the voucher choice program (Section 8) is to provide housing choice to renters to obtain housing throughout the market area, not just in concentrated subsidized housing. Households utilizing vouchers pay 30 percent of income for rent and utilities. The difference between this amount and the HUD Fair Market Rent (FMR) is the tenant’s subsidy, provided through locally through the Brazos Valley Council of Governments. These 1,902 local vouchers allow greater dispersion of low income households, allowing them to obtain rental housing anywhere the rent is below the FMR. FMRs in Bryan are generally high enough so that voucher holders have housing choices across a broad geographic area. The above map indicates the success of this strategy, as voucher holders are well dispersed throughout the community. There is currently a significant waiting list for housing vouchers, as approximately 1,600 applicants remain unserved.

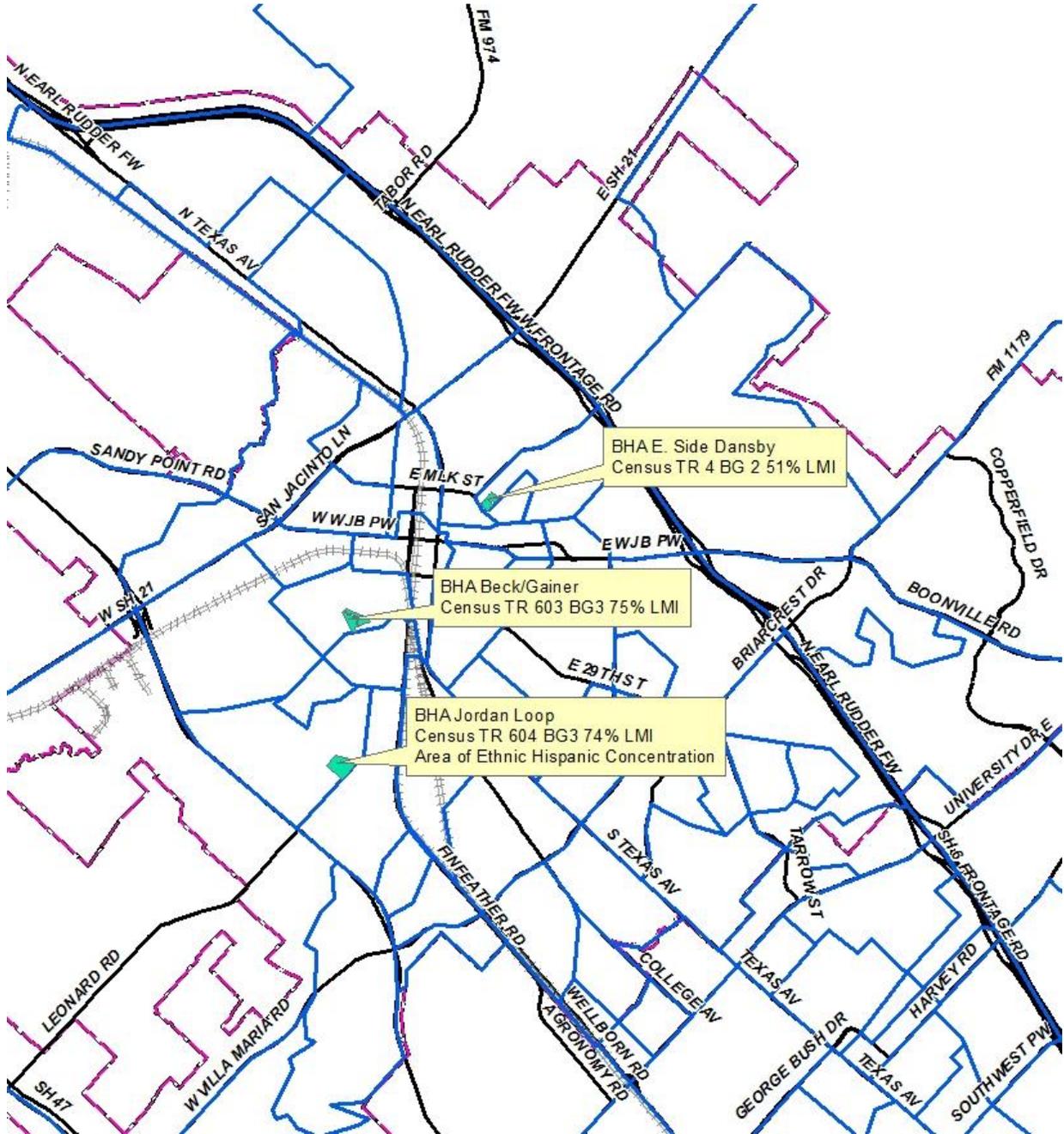
HUD Fair Market Rents, Bryan, TX

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	674	679	837	1,210	1,451

The HOME and Fair Market rents for efficiency and one-bedroom units in the City of Bryan are less than the median rent reported in the 2009-13 ACS, and greater than the median rent for 2 bedrooms or more. This information would seem to indicate that more affordable housing may be needed for 2 or more bedroom-units. The higher rents in those unit types may also encourage the market to utilize rental assistance programs, such as Section 8 vouchers and TBRA.

- Public housing: There are 300 multi-site public housing units in the City of Bryan operated by the Public Housing Authority of the City of Bryan, which are located in primarily low to moderate income areas, and one area of minority ethnic (Hispanic) concentration. See below map:

Distribution of Public Housing



In light of the U.S. Supreme Court's Disparate Impact ruling, any future expansion or development at these sites must be further evaluated to determine the extent to which the development may disparately impact protected classes. New public housing may be required to be located in more affluent areas of the city to avoid adverse impacts to minorities.

- Homeless persons: No ordinance other than those relating to securing unsafe structures address homelessness or vagrancy.
- Low Income Housing Tax Credit (LIHTC) Multifamily Developments: On June 25, 2015, the United States Supreme Court upheld the application of disparate impact under the Fair Housing Act ("FHA") in *Texas Department of Housing & Community Affairs v. The Inclusive Communities Project, Inc.* The court held that a plaintiff may establish liability, without proof of intentional discrimination, if an identified business practice has a disproportionate effect on certain groups of individuals (poor minorities/protected classes) and if the practice is not grounded in sound business considerations. At issue was whether TDHCA's rules regarding Low Income Housing Tax Credit developments encouraged development in primarily low-income, minority neighborhoods.

The City of Bryan has evaluated the distribution of the Housing Tax Credit Developments within its jurisdiction, and found that only one, Emerald Park Apartments, falls within a low to moderate income area that is also an area of minority concentration. Emerald Park is a 64-unit development constructed in 1993. There are 5 total LIHTC developments with approximately 764 total units. The developments are generally located along or with close access to major roads with good access to public transportation, and contain sufficient units accessible to the disabled. All but one, Highland Villas, a newly completed development, are within LMI census block groups (See map, below). Future expansion or development primarily at the Emerald Park location must be further evaluated to determine the extent to which the development may disparately impact protected classes. Support for future LIHTC units by the City should be targeted to avoid low and moderate income areas and areas of minority concentration to avoid disparate adverse impacts to protected classes. See map below:

Potential Areas of Discriminatory Business Practices and Identification of Impediments:

- The most likely potential discriminatory practices may develop through discriminatory advertising by providers of sale or rental housing. Housing providers should be encouraged through public outreach to display fair housing logos on their advertising and marketing materials, and to use diverse human models in photos and pictures, and to include bilingual advertising in Spanish.
- Another potential discriminatory practice may be the development of a trend toward reducing the number of occupants in single family dwellings, either through current use of the Residential Conservation District zoning, or by future modification of the Zoning Ordinance in order to reduce neighborhood difficulties with traffic and noise by student residents.
- The current occupancy limit imposed by the constitution of the State of Texas is found in the Texas Property code, and generally allows adult occupants to number three times the number of bedrooms in the unit:

§ 92.010 OCCUPANCY LIMITS. (a) Except as provided by Subsection (b), the maximum number of adults that a landlord may allow to occupy a dwelling is three times the number of bedrooms in the dwelling. (b) A landlord may allow an occupancy rate of more than three adult tenants per bedroom: (1) to the extent that the landlord is required by a state or federal fair housing law to allow a higher occupancy rate; or (2) if an adult whose occupancy causes a violation of Subsection (a) is seeking temporary sanctuary from family violence, as defined by Section 71.004, Family Code, for a period that does not exceed one month. (c) An individual who owns or leases a dwelling within 3,000 feet of a dwelling as to which a landlord has violated this section, or a governmental entity or civic association acting on behalf of the individual, may file suit against a landlord to enjoin the violation. A party who prevails in a suit under this subsection may recover court costs and reasonable attorney's fees from the other party. In addition to court costs and reasonable attorney's fees, a plaintiff who prevails under this subsection may recover from the landlord \$500 for each violation of this section. (d) In this section: (1) "Adult" means an individual 18 years of age or older. (2) "Bedroom" means an area of a dwelling intended as sleeping quarters. The term does not include a kitchen, dining room, bathroom, living room, utility room, or closet or storage area of a dwelling. Added by Acts 1993, 73rd Leg., ch. 937, § 1, eff. Sept. 1, 1993. Amended by Acts 2003, 78th Leg., ch. 1276, § 7.002(o), eff. Sept. 1, 2003.

Occupancy limits have also been addressed by the Federal Fair Housing Act of 1968 and corresponding legislative history. The following quotations regarding occupancy limits and familial status are taken from City of Richmond Heights, Ohio, *Defendant*, City of Warrensville Heights, Ohio; City of Fairview Park, Ohio; City of Bedford Heights, Ohio, *Defendants-Appellees* in the U.S. Court of Appeals, 6th Circuit.

Despite its broad goal of eradicating discrimination in housing based on familial status, however, Congress also recognized the legitimate interests local and state governments have in enacting non-discriminatory occupancy restrictions. Accordingly, Congress made clear that:

These provisions are not intended to limit the applicability of any *reasonable* local, State, or Federal restrictions on the maximum number of occupants permitted to occupy a dwelling unit. A number of jurisdictions limit the number of occupants per unit based on a minimum number of square feet in the unit or the sleeping areas of the unit.

Reasonable limitations by governments would be allowed to continue, as long as they were applied to all occupants, and did not operate to discriminate on the basis of race, color, religion, sex, national origin, handicap or familial status. *Id.* at 31; *see also Edmonds*, 514 U.S. at 735 n.8 (quoting legislative history). (Emphasis added)

It is possible that limiting occupancy in single family dwellings within the City or within neighborhoods may violate the test of whether or not occupancy limits are reasonable or discriminate against families. It is recommended that the City maintain awareness of this issue as case law is decided.

- Disparate Impact: Future City of Bryan policies, programs, and projects for LIHTC developments, public housing, and other grant-supported developments should be evaluated for compliance with the U.S. Supreme Court's Disparate Impact ruling to determine the extent to which the City's programs and policies may disparately impact minorities. This will require consideration of whether the City's policies, programs, and projects expand housing opportunities for protected classes throughout the city, with concerns as to whether contemplated projects will have numbers of bedrooms to accommodate both large families and the elderly, as well as providing access to disabled residents. Attention to evolving case law and guidance from HUD will be necessary should expansion or redevelopment be proposed for existing LIHTC or public housing sites falling within LMI areas and areas of minority concentration.

Housing Availability and Affordability Profiles

General Market and Inventory

In 2008, Bryan had a total of 66,819 persons living in 28,421 dwelling units (du) for a dwelling unit density of 2.35 persons/du. The U.S. Census Bureau estimates for dwelling units and population show a total population of 73,693 and a total of 30,974 dwelling units in 2013. A more recent calculation of Bryan's population and housing inventory by the City of Bryan's Planning Department now estimates a total 2015 population of 82,013, resulting in a slight increase in the density ratio of persons per dwelling unit, indicating increased housing demand and suggests that local housing development may be somewhat lagging demand. An upward trend in density and demand may eventually result in increased shelter cost and burden the area's low and moderate income citizens more severely than other income groups (See charts below).

The 2009-2013 ACS 5-year estimate shows 27,428 occupied housing units in Bryan (48.1% owner-occupied and 51.9% renter occupied). Estimated overall vacancy rate is 11.4. The median housing value is \$112,100 and the median rent is \$780. There appears to be a sufficient number of affordable housing units, 10,770 units, (monthly owner/renter cost <30% AMI) for households with income limits up to 100% AMI. There are 10,560 owner occupied units and 5,870 rental units that have monthly costs of less than 30% of the household's monthly income. Based on the 2007-11 CHAS, there were 27,330 households up to 100% AMI. Above the 100% AMI, there are 13,980 households and insufficient affordable housing units for this group. While data shows sufficient housing units for person with incomes up to 100% AMI, it is not an indication adequate condition of units. The 2007-11 CHAS indicated that 61.3% of rental units had one of the four CHAS housing problems, and likewise for 27.4% of owner occupied units.

Single-Family Housing Affordability

In terms of affordability, the single-family housing in the Bryan-College Station MSA is somewhat less affordable than comparable markets. A comparison of similar sized university communities reveals a slight lack of affordability in the Bryan-College Station market. The following chart shows that the city’s market is slightly less affordable than Abilene, Denton, Lubbock, Nacogdoches, Tyler and Waco and is about the same level in the Texas market at large. A ratio of 1.0 indicates that the median family income is exactly equal to the income that a lender would require for the family to purchase a median-price dwelling. A ratio greater than 1.0 means that median-income families earn more than enough needed to buy a median-priced house. While the local market is somewhat about similar affordability of Texas markets, we are slightly more affordable than the national market. The trend for the state, national and local markets, however, has seen affordability slightly decrease each year since 2014.

Housing Affordability Comparison

Texas MLS Area	4th 2014	Qtr	3rd 2014	Qtr	4th 2013	Qtr	2014	2013
Bryan-College Station	1.75		1.76		1.76		1.79	1.87
Abilene	2.70		2.05		2.50		2.13	2.50
Denton County	2.35		2.31		2.45		2.33	2.62
Lubbock	2.35		2.23		2.28		2.29	2.44
Nacogdoches	1.96		1.91		1.97		2.05	1.94
Tyler	1.89		1.88		2.27		1.90	2.38
Waco	2.02		2.01		2.03		2.07	2.16
Texas	1.74		1.70		1.79		1.72	1.90
USA	1.59		1.51		1.64		1.56	1.73

Source: Real Estate Research Center at Texas A&M University

Currently there is a very tight supply of single family housing available to purchase, with only a 3.5-month supply available, creating a seller’s market and continued upward pressure on prices. A 6.5-month inventory is considered a balanced market, according to the Real Estate Center at Texas A&M University. In the current market, lower income buyers are priced out of homes in acceptable condition, and buyers requiring financing find that they are up against cash investors purchasing investment properties for rental in the lower price ranges. This results in more households remaining renters rather than becoming homeowners.

Local Rental Housing Market

According to the city’s building permit reports, Bryan’s rental housing development keeps increasing after Texas housing boom from 2011, which have seen a significant increase in both numbers and values of new units. Otherwise, a slight decline in multi-family construction allowed rental rates to remain steady, and occupancy rates to improve somewhat. The following is information pertinent to the local rental market.

- The average rental cost per square foot locally in 2015 was \$0.91 as compared to the higher rate of \$1.01 for the Texas Metro Average. This demonstrates a slightly more affordable rental market locally, as compared to other Texas metropolitan markets. Following is information from the Real Estate Center at Texas A&M University providing the most current apartment statistic for our metro area.

Bryan-College Station Apartment March 2015 Statistics

Rent / Occupancy	Bryan/College Station	Texas Metro Average
Average rent per square foot	\$0.91	\$1.01

Average occupancy rate	97.2%	96.4%
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- Few permits for multi-family rental units were issued in Bryan between 2005 and the end of 2009, with a large increase in Bryan apartment development in 2011 and even larger in 2012. While a correlating spike in apartment construction seen in the Bryan – College Station MSA as a whole in 2013. Much smaller numbers of new apartment constructions was observed in 2014 for both Bryan and College Station, suggesting moderation due to the economic slowdown of 2014-2015. Permits for multi-family rental units in early 2015 continue to be slow as compared to previous years.
- The fall semester enrollment for incoming freshmen at Texas A&M University was at an all-time-high, and Blinn College continues to grow, therefore the local residential rental demand will be healthy. These two institutions represent approximately 67,500 students, of which approximately 40,000 rely on off-campus housing.
- The following two charts show the average occupancy and rental rates for the Bryan-College Station MSA. Information is also presented to provide a comparison between the local market’s rental rates and the U.S. Department of HUD’s published Fair Market Rental Rates.

Average Overall Occupancy and Rental Rates Bryan/College Station, October 2014	
Average Overall Occupancy	94.98%
Overall Rental Rates	
Average Market Rent / Sq. Ft.	\$0.932
0 Bedroom (Studio)	\$1.224
1 Bedroom	\$1.047
2 Bedroom	\$0.873
3 Bedroom	\$0.823
4 Bedroom	\$0.821
Average Market Rent / Unit	\$763.84
0 Bedroom (Studio)	\$587.10
1 Bedroom	\$692.76
2 Bedroom	\$805.29
3 Bedroom	\$991.55
4 Bedroom	\$1,314.00

Source: Real Estate Center at Texas A&M University and O’Conner & Associates

Average Rental Rates as Compared to Fair Market Rates Bryan/College Station, 2014		
Size / Type Unit	Average Market Rent / Unit	FY2014 Fair Market Rents
0 Bedroom (Studio)	\$587.10	\$699.00
1 Bedroom	\$692.76	\$704.00
2 Bedroom	\$805.29	\$868.00
3 Bedroom	\$991.55	\$1,255.00
4 Bedroom	\$1,314.00	\$1,505.00

Source: Real Estate Center at Texas A&M University; O’Conner & Associates; and; U.S. Department of HUD

- At a rental rate of \$991.55 per month for a 3-bedroom apartment, a four person, moderate-income family (80% of AMI - \$48,700 annual income), will spend 24% of its annual income on rent. This is an affordable monthly rent based on income.
- At the same rate of \$991.55, a four person, low-income family (50% of AMI - \$30,450 annual income), will spend 39% of its annual income on rent for a three bedroom apartment. This is a marginally affordable monthly rent based on income.

- A very-low income household (30% of AMI - \$24,250 annual income), will spend 49% of its annual income on rent for a three bedroom apartment at the average market rate of \$991.55. This is not an affordable monthly rent based on income.

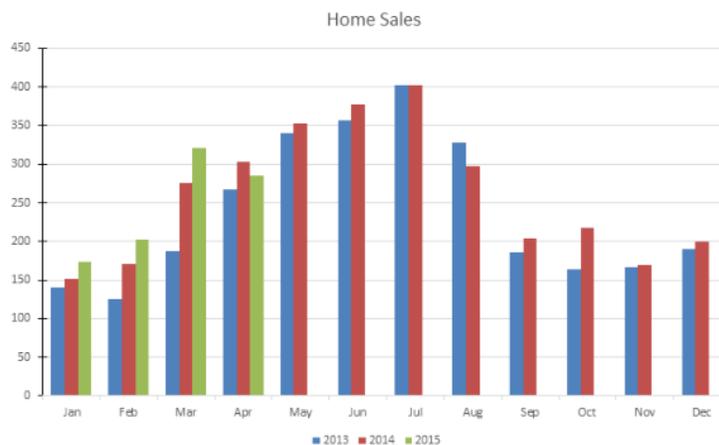
As the chart above indicates, the local average market rents per unit are typically reasonable, as compared to the U.S. Department of HUD’s published Fair Market Rents for our Metropolitan Statistical Areas. One exception is the average market rent for 4-bedroom units, which calculates to be approximately 13% lower than published Fair Market Rent for our market.

In summary, local rental supply and pricing appears to be adequate and affordable to all but the lowest income residents. There will, however, be continued upward pressure on demand and pricing due to the continued growth of the local college student population. This is especially true since students, as compared to the lower income non-student families, are often supported financially by family members and, therefore, can pay higher rents in spite of their lack of substantial income. Consequently, increased economic opportunities for the wage-earners of these families is as, or more, important than simply increased numbers of new rental units. Maintaining funding for housing vouchers/certificates for very low and low income families is also an important component in addressing rental housing affordability in the community. Additional large, multifamily developments are currently in the planning stages to meet the college student demand, which should increase rental opportunities for workforce households.

Local Single Family Sales Market

The local single-family sales market has seen a continued increase in the number of homes sold over the last three years, while there has been a slowdown in the increase of the average sales price of homes sold. The number of sales for the same period keeps slightly growing from 2012 to 2014 (see Bryan-College Station MLS Residential Housing Activity Chart below)

**Bryan-College Station MLS Residential Housing Activity
January 2012 –April 2014**



Date	Sales	Dollar Volume	Average Price	Median Price	Total Listings	Months Inventory
2012-Jan	115	20,634,783	179,400	140,700	1,486	8.8
Feb	124	19,788,800	159,600	152,000	1,634	9.6

Mar	149	26,643,942	178,800	154,300	1,806	10.6
Apr	193	35,334,793	183,100	156,600	1,834	10.8
May	294	51,715,769	175,900	153,100	1,793	10.2
Jun	293	50,348,419	171,800	149,300	1,734	9.9
Jul	292	52,928,291	181,300	154,400	1,669	9.3
Aug	296	55,447,814	187,300	159,700	1,518	8.1
Sep	149	28,433,703	190,800	170,000	1,498	7.9
Oct	163	31,263,079	191,800	155,200	1,458	7.5
Nov	159	28,881,595	181,600	149,100	1,442	7.3
Dec	134	22,886,684	170,800	148,400	1,442	7.3
2013-Jan	141	26,961,175	191,200	155,500	1,486	7.5
Feb	125	18,976,762	151,800	146,900	1,599	8.0
Mar	187	33,859,431	181,100	161,000	1,750	8.7
Apr	267	51,056,250	191,200	158,200	1,680	8.1
May	341	68,161,256	199,900	161,200	1,581	7.4
Jun	357	69,643,093	195,100	163,700	1,462	6.7
Jul	402	76,115,910	189,300	161,000	1,385	6.1
Aug	328	63,759,360	194,400	166,100	1,385	6.0
Sep	186	35,220,141	189,400	156,500	1,201	5.2
Oct	164	32,813,858	200,100	167,300	1,155	5.0
Nov	166	29,754,064	179,200	156,500	1,132	4.9
Dec	190	35,168,785	185,100	158,800	1,057	4.4
2014-Jan	152	29,457,300	193,800	155,300	1,199	5.0
Feb	171	33,326,264	194,900	168,500	1,218	5.0
Mar	275	50,403,677	183,300	155,300	1,261	5.0
Apr	303	60,581,421	199,900	169,500	1,271	5.0

Notes: Residential data includes single-family, townhouses and condominiums.

Source: Bryan-College Station Board of Realtors and Real Estate Center at Texas A&M University

April of 2012 saw the highest number of MLS listings for one month (1,834) seen in the previous two years. Review of Housing Price Index (HPI) information from the Federal Housing Finance Agency for the last five years ending in March of 2015 shows that, with the exceptional booming of 2014, healthy home price increases are seen as compared to the same reporting quarter of each previous year. The rise in HPI for 2015 was, however, less dramatic than the HPI for the four quarters in 2014.

However, in comparing the Bryan-College Station to two other comparably sized, university communities in Texas (Lubbock and Waco), we find that over the last twenty quarters, the Bryan-College Station reported HPI's have been calculated higher nine times, compared to Lubbock's and Waco's six and four times, respectively.

The Bryan-College Station HPI also compares favorably to the Texas HPI's for 2011 and 2014. This is a positive indication of a relatively healthy single-family sales market restoring locally. One element of the MLS Residential Housing Activity chart below that may indicate a coming balance of the local single-family market is the stable inventory calculated for the first season of 2014. This stable inventory may

temporarily slow the increase in home prices, which may be advantageous to first-time and lower income buyers trying to enter the market. However, the current economic slow-down may negate any advantage that first-time and lower income buyers may realize.

MSA HPI Comparison for B/CS, Lubbock, and Waco
Four-Quarter Percent Change in FHFA MSA-Level House Price Indexes
(All Transactions Index, 2015Q1)

Year	Quarter	B/CS	Lubbock	Waco
2015	1	1.1	0.1	1.2
2014	4	3.0	0.05	2.7
2014	3	0.1	1.0	0.5
2014	2	2.5	3.0	0.2
2014	1	3.2	-0.4	-0.2
2013	4	1.9	2.6	0.4
2013	3	-1.5	0.3	2.7
2013	2	1.0	1.8	0.1
2013	1	0.4	-0.7	-0.3
2012	4	0.5	1.3	-0.02
2012	3	-0.7	-0.3	-0.2
2012	2	1.4	1.0	2.0
2012	1	1.4	-0.3	-1.5
2011	4	-4.0	0.3	1.4
2011	3	2.9	0.3	0.5
2011	2	2.5	0.6	0.3
2011	1	-5.5	-0.6	-0.6
2010	4	2.2	0.2	0.6
2010	3	0.8	0.8	-0.5
2010	2	-0.3	1.7	3.4
2010	1	0.6	-0.8	-2.3

Source: Federal Housing Finance Agency

B/CS MSA Housing Price Index (HPI) Comparison
Four-Quarter Percent Change in Level House Price Indexes
(All Transactions Index, 2015Q1)

Year	Quarter	B/CS	Texas
2015	1	1.1	1.91
2014	4	3.0	1.37
2014	3	0.1	2.27
2014	2	2.5	0.83
2014	1	3.2	2.01
2013	4	1.9	2.32
2013	3	-1.5	1.53
2013	2	1.0	2.29
2013	1	0.4	1.08
2012	4	0.5	1.80
2012	3	-0.7	1.85
2012	2	1.4	1.56
2012	1	1.4	1.39
2011	4	-4.0	0.82
2011	3	2.9	0.17
2011	2	2.5	0.47
2011	1	-5.5	-0.28
2010	4	2.2	-1.76
2010	3	0.8	-0.35
2010	2	-0.3	-0.07
2010	1	0.6	0.04

Source: Federal Housing Finance Agency

After a two to three year decline in the number of homes sold in Bryan-College Station, the number of homes sold and the average sales price keep rising from 2010 to 2014. In the city's 2010-2014 5-Year Consolidated Plan, the largest two price ranges of homes sold were \$120,000 - \$139,999 (16.2%) and \$140,000 - \$159,999 (17.3%). In 2014, the two highest percent ranges shifted up to \$140,000 - \$159,999 (14.9%) and \$160,000 - \$179,999 (13.2%). The following charts and graphs demonstrate how the price distribution of single-family homes sold in local market has, over the last decade, shifted from being predominately in the \$100,000 to \$160,000 range in 2004 (median – \$123,700; average - \$139,300), to the \$120,000 to \$200,000 in 2009 (median – \$149,500; average - \$168,200), and finally to the \$140,000 to \$250,000 range in 2014 (median – \$169,500; average - \$202,900). This demonstrates the consistent

upward trend of local single-family home prices, even while the volume of sales sometimes trends downward.

Price Distribution of MLS Homes Sold in Bryan-College Station

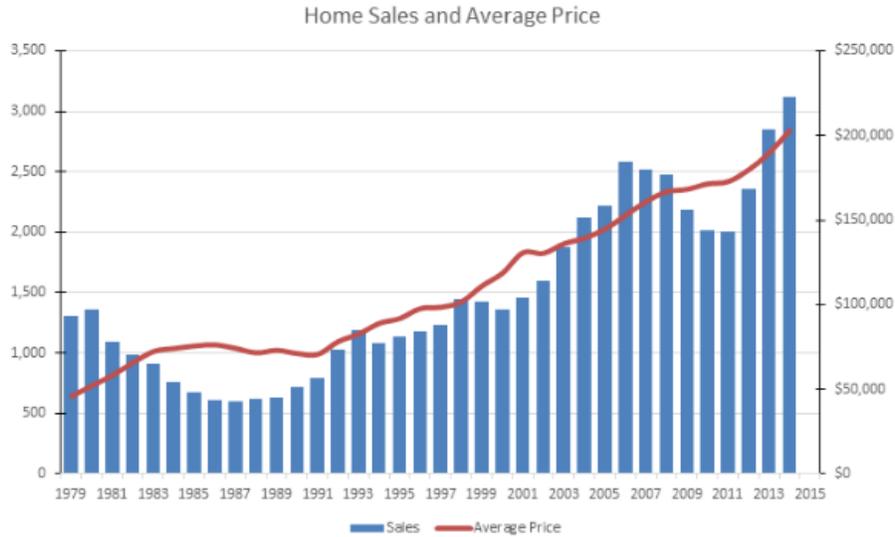


Price Range	Percent Distribution											
	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	
\$29,999 or less	2.1	2.2	1.2	1.2	1.7	1.1	1.4	1.3	0.8	1.0	0.5	
30,000 - 39,999	1.9	1.9	1.0	1.6	1.4	1.0	1.2	0.8	1.4	0.6	0.5	
40,000 - 49,999	2.0	2.0	1.5	1.9	1.2	1.6	1.6	1.9	1.7	1.1	1.1	
50,000 - 59,999	3.0	3.2	3.0	2.7	2.9	2.2	2.2	2.1	1.9	1.4	1.3	
60,000 - 69,999	3.7	3.2	3.2	2.9	2.7	2.3	2.0	2.0	1.9	2.2	1.8	
70,000 - 79,999	4.9	4.1	3.4	3.2	2.9	2.1	2.5	2.6	2.7	1.9	2.3	
80,000 - 89,999	6.5	5.6	5.1	4.1	4.0	3.2	3.5	3.4	2.8	1.8	2.1	
90,000 - 99,999	6.8	5.7	4.7	3.5	4.8	3.6	2.8	3.0	3.1	3.1	2.2	
100,000 - 119,999	15.8	13.7	13.8	9.6	7.9	8.7	8.6	8.8	7.5	6.3	7.4	
120,000 - 139,999	18.3	18.1	17.2	20.2	17.3	16.2	13.9	14.1	14.1	12.7	9.6	
140,000 - 159,999	9.9	12.5	14.8	14.2	15.1	17.3	17.1	18.4	17.3	17.9	14.9	
160,000 - 179,999	5.4	6.5	8.2	9.0	10.5	11.6	13.6	11.1	11.1	14.0	13.2	
180,000 - 199,999	4.8	4.8	5.2	4.7	5.7	6.1	6.3	6.4	8.1	8.5	9.2	
200,000 - 249,999	6.7	8.1	7.4	8.1	8.3	10.2	9.8	9.7	9.8	10.1	12.2	
250,000 - 299,999	3.8	3.4	4.0	5.4	4.9	5.6	5.3	5.0	5.8	6.3	7.0	
300,000 - 399,999	3.3	3.2	4.0	4.3	4.5	4.4	4.9	5.0	5.5	5.9	7.9	
400,000 - 499,999	0.7	1.2	1.2	2.0	2.1	1.9	1.9	2.0	2.3	2.6	3.7	
500,000 and more	0.6	0.7	1.0	1.2	2.0	1.1	1.3	2.1	2.3	2.9	3.1	

Notes: Residential data includes single-family, townhouses and condominiums.

Source: Bryan-College Station Board of Realtors and Real Estate Center at Texas A&M University

Bryan-College Station MLS Residential Housing Activity



Date	Sales	Dollar Volume	Average Price	Median Price	Total Listings	Months Inventory
1979	1,303	59,585,186	45,700	-	-	-
1980	1,356	70,682,091	52,100	-	-	-
1981	1,093	63,671,033	58,300	-	-	-
1982	988	64,976,549	65,800	-	-	-
1983	915	66,159,992	72,300	-	-	-
1984	755	55,891,632	74,000	-	-	-
1985	678	51,227,892	75,600	-	-	-
1986	609	46,403,303	76,200	-	-	-
1987	595	44,086,518	74,100	-	-	-
1988	621	44,396,192	71,500	-	-	-
1989	636	46,409,286	73,000	62,600	895	17.7
1990	716	50,872,164	71,100	62,500	798	13.6
1991	793	56,021,696	70,600	63,700	656	10.8
1992	1,023	79,972,169	78,200	68,300	520	7.0
1993	1,186	98,089,804	82,700	73,600	450	4.8
1994	1,080	96,041,493	88,900	77,700	542	5.6
1995	1,136	104,305,773	91,800	80,500	540	6.1
1996	1,183	115,545,000	97,700	84,300	603	6.1

1997	1,232	121,340,000	98,500	84,200	623	6.3
1998	1,448	147,200,000	101,700	88,600	598	5.4
1999	1,421	157,770,000	111,000	95,000	528	4.3
2000	1,356	160,825,000	118,600	102,200	560	4.9
2001	1,458	190,570,000	130,700	116,600	710	6.0
2002	1,601	208,760,000	130,400	116,000	768	6.0
2003	1,876	255,230,000	136,100	123,300	992	7.0
2004	2,117	294,945,000	139,300	123,700	1,157	6.9
2005	2,221	321,430,000	144,700	129,400	1,165	6.4
2006	2,580	394,225,000	152,800	135,100	1,236	6.2
2007	2,514	404,540,000	160,900	138,900	1,228	5.7
2008	2,471	412,155,000	166,800	144,200	1,202	5.7
2009	2,184	367,455,913	168,200	149,500	1,212	6.5
2010	2,011	344,774,401	171,400	152,000	1,562	8.7
2011	2,009	347,171,293	172,800	150,800	1,606	9.8
2012	2,361	424,307,672	179,700	154,100	1,610	8.9
2013	2,854	541,490,085	189,700	160,200	1,406	6.5
2014	3,123	633,754,812	202,900	169,500	1,106	4.4

Notes: Residential data includes single-family, townhouses and condominiums.
 "-" represents no or underreported data.

Source: Bryan-College Station Board of Realtors and Real Estate Center at Texas A&M University

Housing Needs

This section details the housing needs among the low income population groups of the city with respect to Section 91.205(b) of the Consolidated Plan regulations. These observations are based on the 2007-2011 and 2009-2011 HUD CHAS data. The regulations define housing needs as any form of cost burden, overcrowding or deteriorating housing condition.

The following table (Table 1) details households that have any housing problems (cost burden, overcrowding, deteriorating housing conditions). Households paying between 30%-50% of their income are considered cost burdened while those paying 50% or more of their income are considered severely cost burdened. As defined above, the table displays the listed income levels.

Table 1

Household by Type, Income, & Housing Problem	Renters					Owners					Total Households
	Elderly	Small Related	Large Related	All other	Total Renters	Elderly	Small Related	Large Related	All other	Total Owners	
Income <=50% MFI	25	2,070	350	3,020	8,485	155	690	350	890	2,085	10,570
Income <=30% MFI	0.0	1,080	200	1,700	2,980	40	285	80	475	880	3,860

% with any housing problems	0.0	75.0	72.5	87.1	81.7	100.0	89.5	100.0	75.8	83.5	82.1
%Cost Burden >30%	0.0	1.4	0.0	3.2	2.3	25.0	31.6	37.5	9.5	19.9	6.3
%Cost Burden >50%	0.0	73.6	57.5	80.0	76.2	75.0	57.9	62.5	66.3	63.6	73.3
Income >30 to <=50 % MFI	25	990	150	1,320	2,485	115	405	270	415	1,205	3,690
% with any housing problems	60.0	76.8	100.0	87.1	83.5	47.8	82.7	64.8	72.3	71.8	79.7
%Cost Burden >30%	60.0	44.4	43.3	33.0	38.4	13.0	43.2	9.3	36.1	30.3	35.8
%Cost Burden >50%	0.0	32.3	53.3	53.8	44.7	34.8	39.5	29.6	33.7	34.9	41.5
Income >50 to <=80%	60	875	280	885	2,100	200	445	340	475	1,460	3,560
% with any housing problems	33.3	64.6	87.5	64.4	66.7	32.5	40.4	63.2	32.6	42.1	56.6
%Cost Burden >30%	33.3	44.0	25.0	53.7	45.2	32.5	33.7	16.2	21.1	25.3	37.1
%Cost Burden >50%	0.0	10.3	0.0	5.6	6.7	0.0	6.7	5.9	4.2	4.8	5.9
Total Households (all income levels)	190	3,975	760	5,270	10,195	1,375	4,155	1,395	5,270	9,745	19,940
% with any housing problems	18.4	54.8	77.6	64.9	61.1	12.4	23.8	48.4	19.8	29.6	45.7
%Cost Burden >30%	18.4	22.0	17.8	20.8	21.0	7.3	14.4	8.6	9.9	13.8	17.4
%Cost Burden >50%	0.0	30.3	25.7	40.8	34.8	5.1	8.8	12.9	9.2	11.3	23.3

Source: CHAS Table 7, Table 16 of 2007-2011

The following describes the income categories examined in determining housing needs and conditions locally:

- Extremely Low Income (income less than 30% of MFI)
- Very Low Income (income between 30%-50% MFI)
- Low Income (income between 50%-80% MFI)
- Middle to Moderate income (income above 80% MFI)

The data is divided between renters and owners. In addition, households are detailed as followed:

- Elderly (1 or 2 member households with either person being 62 or older)
- Small Household (2-4 people)

- Large Household (5 or more people)
- All Other Households

Out of 19,940 households, 45.7% of them have housing problems. The data shows that large related households of renters and owners have significant housing problems. 77.6% of renters and 48.4% of owners within the group have cost burden, overcrowding, or deteriorating housing conditions. Group-wise, 61.1% of renters have any housing problem compared to 29.6% of owners. Households earning 50% or below of MFI had the worse percentage of housing problems with significant more cost burden.

Cost Burden

The table above displays the various levels of cost burden among households. The following points demonstrate:

- Renters have more cost burden compared to owners. 21.0% of renters are cost burdened (spending between 30-50% of income on housing) and 34.8% of renters are severely cost burdened (spending over 50% of income on housing). This is, however, somewhat misleading since the large of student population skews the data making it appear that the renter population is more acutely burdened. This is also applicable to the lowest income category of renters (30% or less of the MFI) as student populations appear in data as very low income.
- Extremely low income households (renters and owners) have more cost burden than any group. 6.3% are cost burdened and 73.3% are severely cost burdened.

Racial / Ethnic Housing Need

The following tables (Tables 2 and 3) analyze the housing needs within a racial or ethnic rubric. The data is divided between renters and owners. The group as a whole percentage is identified as “% of all households with any housing problem”.

The data shows that three race or ethnic groups have extremely elevated housing need: Black, Asian and Hispanic. While a small percentage of local population, Black renters are in elevated housing need across all three income levels shown (72.9%, 78.4%, 86.5%), In addition, extremely low income Black owners (79.6%) experience elevated housing need. Also a small percentage of local population, extremely low and very low income Asian populations experience elevated housing need. Both owners and renters in this group, 100%, in fact, suffer from severe housing needs. The 2013 Census listed 1,722 Asians living in Bryan. The following discussion elaborates on a greater segment of the City’s population that experience elevated housing need: Hispanics.

The 2013 Census showed that 36.5% of the City of Bryan was Hispanic of any race. This amounted to 28,174 persons - the largest minority in Bryan. Data also suggests that Hispanic owners are the largest population experiencing elevated housing need. Among all extremely low income owners (0-31%MFI, 83.5% suffer severe housing problems. Among Hispanics, however, this figure jumps to 93.5%. Again, examining another income group, among all low income owners (51-80%MFI), 42.0% suffer severe housing problems. Among Hispanics, however, the figure is 44.0%, again, demonstrating an elevated housing need among this ethnic group.

Table 2

	Renters with Housing Problems		
	0-30% MFI - Extremely Low	31-50% MFI - Very Low	51-80% MFI - Low
% of all households with any housing problem	81.8%	83.3%	66.7%
White, Non-Hispanic	93.4%	83.9%	53.4%

Black, Non-Hispanic	72.9%	78.4%	86.5%
Asian	33.3%	100.0%	N/A
Native American or Pacific islander	N/A	N/A	N/A
Hispanic	77.9%	80.0%	69.4%

Source: CHAS Tables 1 of 2007-2011

Note: Native American represents American Indian or Native Alaskan.

N/A refers to no occupation under the catalogue

Table 3

	Owners with Housing Problems		
	0-30% MFI - Extremely Low	31-50% MFI - Very Low	51-80% MFI - Low
% of all households with any housing problem	83.5%	71.8%	42.0%
White, Non-Hispanic	80.0%	69.2%	38.8%
Black, Non-Hispanic	79.6%	84.6%	42.9%
Asian	100.0%	100.0%	66.7%
Native American or Pacific islander	N/A	N/A	N/A
Hispanic	93.5%	65.9%	44.0%

Source: CHAS Tables 1 of 2007-2011

Note: Native American represents American Indian or Native Alaskan.

N/A refers to no occupation under the catalogue

Housing Needs for the Elderly/Disabled

As defined above, elderly households are 1 and 2 member household with each person being 62 or older. Table 1 outlines the housing problems for this group. Out of 190 elderly renters, 18.4% have a housing problem. Out of 1,375 elderly owners, 12.4% have a housing problem. Again, renters have more housing problems than owners, like much of the City. In addition, 100% of extremely low income elderly owners have housing problems, while no extremely low income elderly renters live in Bryan at the time of 2011. Again, like the City as a whole, the lower income households have experience elevated housing need.

CHAS also maintains data for the disabled or people with “mobility and self-care limitation”. The following tables (Tables 4 and 5) describe this group’s housing needs separated by renters and owners. The data will include the extra elderly or those households where either occupant is 75 or older. It will also contain disabled households listed as “all other”.

Table 4

Income Level	Disabled Renters with any Housing Problem			Total Renters
	Extra Elderly	Elderly	All Other	
Extremely Low 0-30% MFI	66.7%	71.1%	81.1%	81.7%
Very Low 31-50% MFI	51.1%	40.0%	57.9%	83.5%
Low 51-80% MFI	81.3%	59.1%	55.6%	66.7%

Source: CHAS Tables 5&6 of 2009-2011

Extra Elderly or Elderly refer to households that contains at least 1 person falls within the age range.

Table 5

Income Level	Disabled Owners with any Housing Problem			Total Owners
	Extra Elderly	Elderly	All Other	
Extremely Low 0-30% MFI	73.3%	75.0%	73.0%	83.5%
Very Low 31-50% MFI	55.8%	62.5%	75.0%	79.7%
Low 51-80% MFI	16.4%	45.0%	38.7%	56.6%

Source: CHAS Tables 5&6 of 2009-2011

Amongst the disabled, housing problems follow a similar path as with most of the City. Out of 1,780 disabled renters, 66.5% have a housing problem. Out of 1,415 disabled owners, 37.9% have a housing problem. Again, the renters fair worse than the owners. The data also demonstrates that the lowest incomes have substantially more housing problems.

The data allows us to see which groups are in higher need. Among renters, low income extra elderly households have significantly higher rate of housing problems of 81.3%. Also, the extremely low income persons in the category listed as “all other” display the need of 81.1%. Among owners, extremely low income and very low income persons in this category are in great need, 73.0% and 75.0% respectively. The “all other” category are those not elderly, but with mobility and/or self-care limitations as defined by the CHAS reports.

Large Household Needs

The CHAS data in Table 6 also shows that large households in Bryan tend to have more housing problems than any other group listed. Of total renters in Bryan, 61.1% reported housing problems. Among large households who rent, this figure jumps to 77.6%. Of total owners in Bryan, 29.6% reported housing problems. Among large households who own, this figure increases to 48.4%. When lower income renters and owners (80% income, or less) are examined separately, the need of larger families, renter and owner, assistance becomes most apparent. Of that group, 85.7% of large family renters and 68.1% of large family owners experience significant housing problems.

Table 6

	Renters with a Housing Problem	Owners with a Housing Problem
Small Households (2-4 people)	54.8% (all income levels)	23.8% (all income levels)
	72.5% (80% income and below)	45.1% (80% income and below)
Large Households (5 or more people)	77.6% (all income levels)	48.4% (all income levels)
	85.7% (80% income and below)	68.1% (80% income and below)

Summary Observations

Following are observations summarizing the findings of our housing market analysis as it relates to: general market and inventory, student impact on housing market, rental housing market, single housing sales market, areas of low and moderate income concentration, areas of racial/ethnic minority concentration, and housing needs by demographic designation:

- An increase in dwelling unit density indicates increased housing demand locally, suggesting that local housing development may be lagging behind demand. An upward trend in density and demand may result in increased shelter cost and burden the area's low and moderate income citizens.
- Local single-family housing is somewhat less affordable than similar sized university communities in Texas, but is slightly more affordable than the national market. The trend, however, has seen affordability increasing locally.
- Occupancy for local apartments in 2015 was 97.2% as compared to the Texas Metro Average of 96.4%, and average rental cost per square foot was \$0.91 as compared to the higher rate of \$1.01 for the Texas Metro Average, demonstrating a more affordable rental market locally, as compared to other Texas markets.
- Latino/Hispanic populations are our largest minority group and the largest ethnic group with elevated housing problems. There is one significant concentration of Hispanic residents in a low-income area in the northwest part of the City.
- The highest occurrence of housing problems across all ethnic and racial groups is seen in the extremely low income category. Renters and owners in this income range have higher cost burden than any group. 6.3% are cost burdened and 73.3% are severely cost burdened.
- The older central, west and northern neighborhoods (mostly located in Census Tracts 5, 6.03 and 6.04) have the highest number of poorly maintained residential properties needing rehabilitation.
- Combined, Texas A&M University and Blinn College represent a total college student demand on the local housing market of approximately 40,000 students, which tends to increase rental rates to the disadvantage of non-student renters.
- The local Housing Price Index (HPI) compares favorably to the Texas HPI's for 2011 and 2014 - indicating a healthy single-family sales market restoring after the housing boom in 2012. However, an elevated inventory in early 2014 may slow increases in home prices – an advantage to new buyers entering the market. Current economic conditions may, however, negate any advantage by reduced incomes and savings.
- Renters have more cost burden compared to owners. 21.0% of renters are cost burdened (spending between 30-50% of income on housing) and 34.8% of renters are severely cost burdened (spending over 50% of income on housing).
- While a small percentage of local population, Black renters are in elevated housing need across all three income levels shown (72.9%, 78.4%, 86.5%), In addition, extremely low income Black owners (79.6%) experience elevated housing need.
- Also a smaller percentage of the population, very low income Asian populations experience extremely high housing problems. Of both owners and renters in this group, 100%, experience

severe housing needs.

- Hispanic owners are the largest minority group experiencing elevated housing need. Among very low income (31-50%MFI) Hispanic owners, 93.5% experience elevated need. Among low income (51-80%MFI) Hispanic owners, 44.0% have housing problems.
- 66.7% of extremely low income elderly renters and 73.3% of extremely low income elderly owners have housing problems.
- Among renters, low income extra elderly households have significantly higher rate of housing problems of 81.3%. Also, the extremely low income persons in the category listed as “all other” display the need of 81.1%. Among owners, extremely low income and very low income persons in this category are in great need, 73.0% and 75.0% respectively.
- Census data shows that large lower income households in Bryan tend to have more housing problems than any other group listed. Of that group, 85.7% of large family renters and 68.1% of large family owners experience significant housing problems.
- Substandard and dilapidated housing units are generally concentrated in the older, north/central area around downtown.
- Section 8 Housing Vouchers are well dispersed throughout the jurisdiction, and not significantly clustered by race or ethnicity.
- Housing Tax Credit Developments are dispersed within the jurisdiction, primarily along or nearby major roads with access to public transit. Four of five are within LMI areas, and one is both in an LMI area and an area of minority ethnic concentration.
- Public housing is concentrated in low to moderate income areas, with one area of minority ethnic (Hispanic) concentration, but are otherwise dispersed within the jurisdiction, primarily along or nearby major roads with access to public transit

Employment Opportunities

- **Employment Opportunities:** In June 2015, the Department of Labor Bureau of Labor Statistics shows an unemployment rate for the College Station-Bryan MSA of only 3.9%, ranking 6th of the 25 MSA’s in Texas. The local employment market is demonstrating stability and a tight labor market which will encourage higher wages that will benefit the residential rental market for both property owners and renters alike. According to BLS there are currently over 115,800 persons employed within the College Station-Bryan MSA, with an average wage of \$20.09 per hour (\$41,787/year).
- **Creation of Job Opportunities:** Each year, Texas A&M University employs 2,500 faculty members conducting approximately \$500 million worth of sponsored research projects, assisted by more than 5,000 paid graduate students. Additionally, approximately 3,000 undergraduates each year also conduct independent research with faculty supervision. Texas A&M’s rare triple designation as a Land-, Sea- and Space-Grant institution reflects the broad scope of its research endeavors, with ongoing projects funded by such prominent and diverse agencies as NASA, the National Institutes of Health, the National Science Foundation and the Office of Naval Research.

- **Barriers to Job Opportunities:** There are no known barriers to job opportunities in Bryan. The unemployment rate typically is very low, and it is expected that competition for employees among a growing business community will remain strong. Recent low oil prices have not affected employment in the local economy to the extent that other oil-based local economies have been impacted because of diverse employment opportunities in the area with Texas A&M University as a stabilizing factor.
 - **Incentives for Corporate Relocation:** The City of Bryan incentive program is designed to encourage targeted business growth and development. Qualified economic development prospects creating significant capital investment, employment and payroll may be eligible for incentives tailored to individual business needs. Incentives may include:
 - **Tax Abatements** - An abatement of ad valorem taxes for a period of up to 10 years on increase of value on real and/or personal property.
 - **Land at Reduced Prices or Land Grants** - A reduction in price for property or the grant of land.
 - **Waiver of Select Municipal Permits and Fees** - Certain municipal fees may be waived on items such as tap and meter fees and construction permits.
 - **Fast Track Permitting** - The development process may be expedited through predevelopment and other special-called meetings, slab only permitting, etc.
 - **Grants** - Various grants tailored to business needs.
 - **Tax Increment Financing (TIF)** - Tax increment financing of public improvements to provide water and wastewater lines, roads, and other improvement projects deemed necessary for development.
- **CDBG Funding of Infrastructure for New Business Development:** The City of Bryan CDBG funds have been used for infrastructure development in low and moderate income areas of the City. Recent developments include the installation of sidewalks along a 2.5 mile length of Martin Luther King Jr. Street utilizing CDBG-R funding. These infrastructure improvements help to improve pedestrian access to retain business and attract new employers as well.
- **Job Training Programs:**
 - Workforce Training - Workforce training assistance can be provided through:
 - Brazos Valley Community Action Agency JOBS Program
 - Texas Department of Economic Development Smart Jobs program
 - Blinn College – Bryan Campus
 - Texas Engineering and Extension Service (TEEX)
 - Brazos Valley Council of Governments Workforce Center
- **Welfare to Work Programs (State/Local/CDBG Funding):** The State of Texas Department of Health and Human Services and the Texas Workforce Commission provide welfare to work programs.
- **Evaluation of Employment Opportunities:** The College Station-Bryan Metropolitan Statistical Area is projected to continue to experience moderate growth.

The following tables show the major employers in the Bryan – College Station MSA. The list includes a number of governmental employers, which tend to provide a stabilizing effect on the local job market. The Texas A&M University System alone has over 21,000 employees, many of whom are located in Bryan – College Station. In addition, Blinn College, the Bryan and College Station school districts and the cities of Bryan and College Station each tend to insulate the community from economic downturns while enhancing employment opportunities for local citizens.

The Research Valley Major Employers

Employer	Category	Employees
Bryan ISD	Education	1,000+
College Station ISD	Education	1,000+
Reynolds & Reynolds	Computer Hardware/Software	1,000+
Sanderson Farms	Food Processing	1,000+
St. Joseph Regional Hospital	Health Care	1,000+
Texas A&M University System	Education	1,000+
City of College Station	Government	500-999
Brazos County	Government	500-999
City of Bryan	Government	500-999
College Station Medical Center	Health Care	500-999
H-E-B Grocery	Retail	500-999
Pennccro & Associates	Financial Services	500-999
Scott & White Clinic	Health Care	500-999
Texas A&M Health Science Center	Education	500-999
Walmart	Retail	500-999

Source: Texas Workforce Commission (March 2011), Brazos Valley Workforce Development Area

College Station- Bryan MSA Occupations Table: Bureau of Labor Statistics

Table 1. Employment and wage data from the Occupational Employment Statistics survey, by occupation, College Station-Bryan Metropolitan Statistical Area, May 2014

Occupation ⁽¹⁾	Employment		Mean wages	
	Level ⁽²⁾	Location quotient ⁽³⁾	Hourly	Annual ⁽⁴⁾
Education, training, and library occupations	10,640	1.7	\$31.96	\$66,480
Architecture teachers, postsecondary	150	29.0	(5)	97,220
Engineering teachers, postsecondary	450	16.9	(5)	141,990
Agricultural sciences teachers, postsecondary	660	91.0	(5)	109,310
Biological science teachers, postsecondary	250	6.5	(5)	109,720
Chemistry teachers, postsecondary	70	4.6	(5)	151,160
Economics teachers, postsecondary	60	6.0	(5)	148,250
Health specialties teachers, postsecondary	280	2.3	(5)	91,970
Education teachers, postsecondary	160	3.6	(5)	103,770
Graduate teaching assistants	1,830	19.9	(5)	36,870
Recreation and fitness studies teachers, postsecondary	140	10.4	(5)	90,350

Table 1. Employment and wage data from the Occupational Employment Statistics survey, by occupation, College Station-Bryan Metropolitan Statistical Area, May 2014

Occupation ⁽¹⁾	Employment		Mean wages	
	Level ⁽²⁾	Location quotient ⁽³⁾	Hourly	Annual ⁽⁴⁾
Postsecondary teachers, all other	(5)	(5)	(5)	86,650
Preschool teachers, except special education	130	0.5	14.38	29,920
Kindergarten teachers, except special education	60	0.6	(5)	44,310
Elementary school teachers, except special education	1,210	1.2	(5)	47,110
Middle school teachers, except special and career/technical education	580	1.3	(5)	47,590
Secondary school teachers, except special and career/technical education	670	1.0	(5)	47,680
Career/technical education teachers, secondary school	80	1.3	(5)	51,280
Special education teachers, kindergarten and elementary school	50	0.4	(5)	47,930
Special education teachers, middle school	30	0.5	(5)	44,550
Special education teachers, secondary school	80	0.8	(5)	44,830
Self-enrichment education teachers	60	0.4	21.09	43,870
Teachers and instructors, all other, except substitute teachers	560	2.9	(5)	36,680
Substitute teachers	60	0.1	9.04	18,800
Librarians	100	1.1	21.79	45,330
Library technicians	(5)	(5)	13.00	27,040
Instructional coordinators	210	2.1	26.16	54,410
Teacher assistants	790	0.9	(5)	19,910

(1) For a complete listing of all detailed occupations in the College Station-Bryan MSA, see www.bls.gov/oes/current/oes_17780.htm.

(2) Estimates for detailed occupations do not sum to the totals because the totals include occupations not shown separately. Estimates do not include self-employed workers.

(3) The location quotient is the ratio of the area concentration of occupational employment to the national average concentration. A location quotient greater than one indicates the occupation has a higher share of employment than average, and a location quotient less than one indicates the occupation is less prevalent in the area than average.

(4) Annual wages have been calculated by multiplying the hourly mean wage by a 'year-round, full-time' hours figure of 2,080 hours; for those occupations where there is not an hourly mean wage published, the annual wage has been directly calculated from the reported survey data.

(5) Estimates not released.

Source: BLS **Last Modified Date:** Monday, April 13, 2015

The above Bureau of Labor Statistics data indicate that there is a wide variety of employment opportunities offering sustainable income levels.

The following table demonstrates strong employment growth in the Bryan – College Station MSA over the last decade, especially as compared to many of the other state metropolitan statistical areas. Bryan – College Station outpaced 20 of the 24 other MSA’s reviewed, and also out-performed the State of Texas by approximately seven percentage points.

Texas Metropolitan Area Non-farm Employment Annual Growth Rates
Data as of April 2015

Metropolitan Area	April 2014	April 2015	% Annual Job Growth
Odessa	76.9	81.8	6.4%
Midland	93.3	99.1	6.2%
Corpus Christi	192.8	200.3	3.9%
Dallas-Fort Worth-Arlington	3244.7	3370.5	3.9%
Beaumont-Port Arthur	163.6	169.6	3.7%
Longview	102.0	105.4	3.3%
Austin-Round Rock-San Marcos	911.6	941.1	3.2%
San Antonio-New Braunfels	943.4	973.8	3.2%
Victoria	44.2	45.5	2.9%
San Angelo	47.8	49.1	2.7%
Texas	11480.5	11784.7	2.6%
Houston-Sugar Land-Baytown	2903.6	2972.7	2.4%
Laredo	97.9	100.2	2.3%
Tyler	97.7	99.7	2.0%
McAllen-Edinburg-Mission	242.3	246.4	1.7%
Lubbock	137.0	139.2	1.6%
Waco	111.4	112.9	1.3%
Killeen-Temple-Fort Hood	134.5	136.1	1.2%
Sherman-Denison	45.1	45.6	1.1%
Abilene	68.6	69.3	1.0%
Brownsville-Harlingen	137.9	139.0	0.8%
El Paso	297.2	297.8	0.2%
Amarillo	117.1	117.3	0.2%
Texarkana	58.8	58.7	-0.2%
Wichita Falls	58.1	57.8	-0.5%
Bryan – College Station	105.8	105.2	-0.6%

Sources: Texas Workforce Commission and Real Estate Center at Texas A&M University

Educational Opportunities

The following tables provide information related to local education opportunities, particularly as it pertains to the Bryan Independent School District and Blinn College – the two primary entities providing academic and vocational education and training opportunities.

BISD School District Profile

Fast Facts

Size	453 square miles
Enrollment 13-14	10,029
Expenditure per student	\$9,470
Total expenditures	\$107,528,887
Property value per student	\$318,280
2012 tax rate	\$1.29 per \$100 assessed valuation
Revenue sources	State, 47.77%
	Local, 49.93%
	Federal, 1.50%

Source: Bryan Independent School District

BISD Student Statistics

Grade Level	Number	Percent
Elementary (PK-5):	8,239	52.4%
Middle School (6-8):	3,417	21.7%
High School (9-12):	4,044	25.7%
Total:	15,732	100%

Source: Bryan Independent School District

BISD Ethnicity Demographics

Campus	American Indian (%)	Asian or Pacific Islander (%)	African American (%)	Hispanic (%)	White, Not of Hispanic Origin (%)
Bonham	0.6	0.0	10.0	56.2	31.8
Bowen	0.0	2.8	15.3	29.3	49.7
Bryan Collegiate	0.3	1.5	5.0	64.9	27.8
Bryan High School	0.3	0.6	19.3	49.5	29.1
Carver	0.3	0.0	27.6	60.4	10.2
Crockett	0.4	0.4	25.3	64.8	7.9
Davila MS	0.2	0.0	14.7	56.9	26.7
Fannin	0.4	0.0	20.2	68.4	9.9
Henderson	0.2	0.6	7.5	73.5	17.3
Jane Long MS	0.2	0.5	18.1	58.1	22.3
Johnson	0.0	0.0	3.5	18.8	77.7
Jones	0.0	0.0	19.9	75.8	4.2

Campus	American Indian (%)	Asian or Pacific Islander (%)	African American (%)	Hispanic (%)	White, Not of Hispanic Origin (%)
Juv. Justice Center	0.0	0.0	38.5	50.0	11.5
Kemp	0.4	0.4	27.6	65.2	5.2
Lamar Alternative	0.0	0.0	53.3	42.2	4.4
Mary Branch	0.0	0.9	35.2	31.1	30.2
Mary Catherine Harris School	0.6	0.3	28.2	58.2	12.4
Milam	0.0	0.3	13.3	83.2	2.6
Mitchell	0.2	0.7	30.0	27.6	39.6
Navarro	0.5	0.0	13.7	67.1	17.6
Neal	0.4	0.0	26.2	69.6	2.6
Rudder High School	0.0	0.5	24.9	41.0	32.9
Sam Houston	0.2	0.2	10.6	20.6	66.9
Sam Rayburn MS	0.0	0.5	30.2	36.8	31.6
SFA MS	0.0	0.2	16.1	56.7	25.6
Sul Ross	34.4	0.3	21.9	40.9	34.4
District Total	0.2	0.8	19.7	53.5	24.9

Source: Bryan Independent School District

BISD Student to Teacher Ratio

Grade Level	Ratio
Elementary (K-4):	17 to 1
Elementary (5):	16 to 1
Middle School:	16 to 1
High School:	14 to 1

Source: Bryan Independent School District

BISD Staff Statistics

More than 26% of the 1,028 teachers in the district hold advanced degrees. Professional staff members in Bryan ISD have an average of 10 years of experience, 7 of them in Bryan schools.

BISD Employee Classification

Classification	Number of Employees
Teachers	1,028
Professional Support	265
Campus Administration	265
Central Administration	25
Educational Aides	191
Auxiliary Staff	622

Source: Bryan Independent School District (Texas Academic

- **Busing:** With a fleet of 125 buses covers 453 square miles and travels over 5,000 miles daily. Free service is provided to all students living more than two miles from school. Students in low-mod, minority concentrated areas are bused to other neighborhood schools to equalize the geographic distribution of minority students.
- **Desegregation Plans:** These plans will continue as the school district expands.
- **Geographic Location of Jobs:** Schools are located throughout the city and correlate with employer and neighborhood clusters.
- **Quality of Public Schools:** Bryan public schools are of high quality, high achievement schools. None are underperforming. All are either recognized, or exemplary.
- **Reform Efforts:** BISD continues to improve and expand, with the new Rudder High School recently constructed.
- **Evaluation of Educational Opportunities:** Educational opportunities in the City of Bryan are excellent, thanks in large part to the academic influence of Texas A&M University.

Blinn College – Bryan, Texas Campus

Blinn College has offered classes locally since 1970 and now encompasses more than 80 acres with state-of-the-art facilities. This vibrant community, where college and culture go hand-in-hand, is host to more than 50,000 students from the combined student bodies of Blinn College and Texas A&M University.

Blinn College offers non-credit classes that are designed to fulfill the specific job training needs for individuals, businesses and industry. Through these courses a student can master a skill or learn a subject without taking entrance exams or enrolling in college credit courses. These courses vary in length and are offered throughout the year; days and evenings, on weekdays and weekends.

Certificates of Completion and Continuing Education Units (CEU) are awarded to those students who satisfactorily complete the course. Tuition and fees vary for each course.

The following academic areas of study are also available to students enrolled at the Bryan Campus.

- Business/Computer Science
- Fine Arts
- Health/Kinesiology
- Humanities
- Math and Engineering
- Natural Science
- Parallel Studies
- Social Science
- Applied Sciences

Transportation Networks

Air Service

Community Airport – Easterwood: airport carriers: American Eagle (with flights to Dallas-Ft. Worth International Airport) and Continental Connection (with flights to Houston Bush Intercontinental Airport). Runway length: 8,000 ft. International Airports within 1.5 hours drive: Austin-Bergstrom and Houston Bush Intercontinental.

Freight Carriers

American Freightways, Central Freight Lines Inc., Con-Way Southwest Express, Consolidated Freightways, Lone Star Transportation, Roadway Express Inc., Tex-Pac MR Delivery, Yellow Freight System Inc

Rail Service Provider:

Union Pacific

Highway / Public Transit

State Highway 6 (4-lane divided) connects with Interstate 35 to Dallas and with U.S. Highway 290 to Houston or Austin, U.S. 190 connects to Baton Rouge, State Highway 21 provides East-West ties to Interstate 35 and Interstate 45.

- **Availability - City vs. Suburbs and within the City:** Transportation networks are easily accessible and available throughout the community. In addition, public transit busses are provided by the Brazos Transit System (The District) and Texas A&M University. Bryan has also been nationally recognized for its dedication to providing a large network of bikeways throughout the city.
- **Evaluation:** Bryan has an adequate, well-planned, and expanding transportation system. The City of Bryan works closely with the Metropolitan Planning Organization and the Texas Department of Transportation to prioritize transportation projects and proactively addresses the future needs of the community with an excellent transportation planning department.
- **Public Transit Options:** The District offers fixed bus routes throughout the community. Operating hourly on weekdays, seven routes converge at a central transfer point adjacent to the B/CS Community Health Clinic. It also offers para-transit services for disabled riders and an on-demand shared ride service. Texas A&M University also operates buses on weekdays for use by students and the public. Its route includes coverage of apartments near campus as well as the Workforce Commission, a hospital, medical offices, and the Blinn College campus (see appendix D).

Fair Housing Complaint Profile

- **Fair Housing Complaints:** There have been few fair housing complaints in the City of Bryan. During period, there have been 19 discrimination complaints made by 10 complainants to HUD. All complaints related to discrimination in rental. More than half of these were related to discrimination based upon rental terms, conditions, or facilities. The primary basis for discrimination complaints was disability (28%), followed by family status and race (20% each). All cases were found to be without cause, withdrawn, or dismissed.
- **Documentation of Fair Housing Complaints:** The following table illustrates the fair housing complaints within the jurisdictional boundaries of the City of Bryan.

Fair Housing Complaint Profile Table

Case Number and Name	Filing Date	Case Completion Type	Bases	Issues
John H. Witherspoon v. Brazos Valley Council of Governments	02/23/10	Withdrawn with Resolution	Disability,	310 - Discriminatory refusal to rent, 380 - Discriminatory terms, conditions, privileges, or services and facilities,
Austin Tenants' Council vs. Aggie Station, et al.	03/22/10	Conciliated	Familial Status,	380 - Discriminatory terms, conditions, privileges, or services and facilities,
Dernice Franklin v Sandra L. & James E. Moore	05/11/10	No Cause	Race, Disability, Familial Status, Retaliation	382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Russell Hairston v. Fercan Kalkan, Property Owner	04/12/11	No Cause	Sex, Retaliation	310 - Discriminatory refusal to rent, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Lillian Thurman v Oakwood Mobile Home Community	06/01/11	Conciliated	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
W. Keith Bouis v Old Oaks Townhomes	06/20/11	No Cause	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 500 - Failure to permit reasonable modification,
Ruben Olague v. Park Hudson Apartments	07/28/11	Withdrawn with Resolution	National Origin,	382 - Discrimination in terms/conditions/privileges relating to rental,
Matthew Turner v Marie Salinas	12/19/11	Withdrawn with Resolution	Race, Sex,	310 - Discriminatory refusal to rent,
Calvin Simpson v Brazos Valley Council of Governments	03/06/12	No Cause	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental, 510 - Failure to make reasonable accommodation,
James Peterson v Brazos Valley Council of Governments	09/06/12	Administrative Closure	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities,
De Angela Merida for Millie Burns v Brookside Apartments	02/06/13	No Cause	Race,	312 - Discriminatory refusal to rent and negotiate for rental, 380 - Discriminatory terms, conditions, privileges, or services and facilities,
Nichole & Joseph Ruiz v Virginia Castleberry	08/09/13	Administrative Closure	National Origin,	381 - Discrimination in terms/conditions/privileges relating to sale, 440 - Other discriminatory acts,
Lynda Hardin-Poston v. Aggieland RV Park	08/28/13	Administrative Closure	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 510 - Failure to make reasonable accommodation,

Ieshia Sheppard v Country Place Apartments	10/21/13	No Cause	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 382 - Discrimination in terms/conditions/privileges relating to rental,
Dernice Franklin v Sammy Destefano	03/05/14	No Cause	Race, Disability, Sex,	310 - Discriminatory refusal to rent, 380 - Discriminatory terms, conditions, privileges, or services and facilities,

- **Administrative Complaints:** No administrative complaints have been received according to the City of Bryan Legal Department.
- **Allegations made through private group, city or state:** There have been no such allegations made of record.
- **Lawsuits: Private actions state attorney general, Dept. of Justice, HUD:** There have been no such lawsuits filed of record which are unresolved during the reporting period.
- **Comparison to Cities of Similar Size/Demographics:** Utilizing the analysis of impediments available on the internet for the cities of Amarillo, it was concluded that similar numbers and types of complaints were received for the time periods data was available.
- **Comparison to National Standards (HDS 1989 & HMPS 1979):** These were standards developed from audit studies of Real Estate sales agents and offices which found differing treatment given to racial minorities. There have been no studies of this type done in the City of Bryan. Comparing the data in the housing complaint profile for the City of Bryan shows seven (7) of fifteen (15) complaints to be the result of discrimination because of race, and all were found to have no cause, were dismissed or withdrawn.
- **Protected groups reporting complaints:** Of the 15 complaints reported, the primary basis for discrimination complaints was race (35%), followed by disability (30%). There was one case regarding terms of sale which alleged discrimination based upon national origin. All cases were found to be without cause, withdrawn, conciliated, or administratively closed. The number of discrimination complaints decreased from the 2005-2009 period, when there were 19 complaints in Bryan. The decrease represents a 21% decrease in discrimination complaints over the prior evaluation period.
- **Complaint issues/allegations:** The predominant issue reported by complainants was rental terms and conditions, of which all have been successfully resolved.
- **Resolution of complaints:** All previous complaints during the 2010-2014 period have been found to have no cause, or were dismissed, conciliated, or withdrawn.

Identification of Actions Initiated Within Jurisdiction

Identification of Actions Initiated by Department of Justice/HUD Against City, Company, or Corporation within the City of Bryan: There are no actions which have been initiated by HUD or DOJ against the City or against any company or corporation within the City of Bryan.

- **Administrative complaints against the City – Status:** None
- **Lawsuits settled or pending by Justice Department:** None
- **Secretary initiated complaints:** None
- **Actions settled or pending by State Attorney General:** None
- **Municipal response:** N/A
- **Evaluation of actions initiated within the jurisdiction:** None

Fair Housing Education Programs

- **Government Agency:** The City of Bryan fair housing education program consists of the following:
 - Presentation and dissemination of fair housing material at public meetings and through public outreach through media and events, including Spanish-language outreach.
 - Conducts periodic surveys of the public, local housing industry and agencies to identify issues involving housing discrimination in the community
 - Accepting applications for CDBG funding from eligible public service agencies, including agencies working to further fair housing
 - Webpage link to the Department of Housing and Urban Development and information regarding fair housing: <http://www.bryantx.gov/community-development/#fairhousing>
 - Participation in the annual Fair Housing Symposium Luncheon for fair housing advocates sponsored by the Brazos Valley Council of Governments
 - Participates in the Homebuyer Education Coalition, sponsored by the Texas Cooperative Extension Service, which educates homebuyers about the home buying process, including fair housing
 - Provides periodic Fair Housing educational presentation to local homeless shelter caseworker staff, jointly with the City of College Station.
 - Provides periodic Fair Housing educational presentation to local Section 8 voucher landlords, jointly with the City of College Station and BVCOG.
- **Private Fair Housing Group:** Project Unity, a local nonprofit public service organization, periodically facilitates fair housing presentations and education.
- **Local Association of Realtors/Apartment Association:** Both of these organizations conduct regular fair housing training for their members.
- **Evaluation of Fair Housing Education Programs:** It is likely that public awareness brought about by the City's fair housing CDBG-funded activities has resulted in a consistent number of reported complaints, therefore the strategy of public outreach has been successful.

Fair Housing Enforcement and Monitoring Provisions

- **City Agency/Private Fair Housing Group/State Agency:** The City of Bryan maintains a fair housing ordinance and monitors fair housing complaints and enforcement periodically while updating its Analysis of Impediments.
- **Local Board of Realtors/Apartment Association/Bankers Association:** These organizations provide means for fair housing complaints and enforcement through arbitration.
- **State Department of Insurance:** The Texas State Department of insurance monitors policies and procedures of Texas Insurers.

- **Austin Tenant’s Council:** This agency has been active in the area assisting with discrimination compliants in the past.

Evaluation of Fair Housing Enforcement and Monitoring Provisions: For the 2010-2014 period, there have been no fair housing complaints made to the City, 15 complaints made to HUD, and no complaints made to the State of Texas regarding discrimination in the City of Bryan. All complaints have been successfully resolved.

Population Profiles

Bryan Demographic Profile Data for use in Analysis of Impediments to Fair Housing Choice

Subject	Number	Percent
SEX AND AGE		
Total population	76,201	100.0
Median age (years)	28.5	(X)
Male population	38,255	50.2
Female population	37,946	49.8
RACE		
Total population	76,201	100.0
One Race	74,240	97.4
White	48,939	64.2
Black or African American	13,748	18.0
American Indian and Alaska Native	420	0.6
Asian	1,313	1.7
Native Hawaiian and Other Pacific Islander	52	0.1
Some Other Race	9,768	12.8
Two or More Races	1,961	2.6
White; American Indian and Alaska Native [3]	263	0.3
White; Asian [3]	184	0.2
White; Black or African American [3]	399	0.5
White; Some Other Race [3]	725	1.0
Race alone or in combination with one or more other races: [4]		
White	50,613	66.4
Black or African American	14,374	18.9
American Indian and Alaska Native	814	1.1
Asian	1,623	2.1
Native Hawaiian and Other Pacific Islander	101	0.1
Some Other Race	10,733	14.1

HISPANIC OR LATINO		
Total population	76,201	100.0
Hispanic or Latino (of any race)	27,617	36.2
Mexican	24,699	32.4
Puerto Rican	228	0.3
Cuban	99	0.1
Other Hispanic or Latino [5]	2,591	3.4
Not Hispanic or Latino	48,584	63.8
HISPANIC OR LATINO AND RACE		
Total population	76,201	100.0
Hispanic or Latino	27,617	36.2
White alone	16,167	21.2
Black or African American alone	342	0.4
American Indian and Alaska Native alone	245	0.3
Asian alone	35	0.0
Native Hawaiian and Other Pacific Islander alone	12	0.0
Some Other Race alone	9,690	12.7
Two or More Races	1,126	1.5
Not Hispanic or Latino	48,584	63.8
White alone	32,772	43.0
Black or African American alone	13,406	17.6
American Indian and Alaska Native alone	175	0.2
Asian alone	1,278	1.7
Native Hawaiian and Other Pacific Islander alone	40	0.1
Some Other Race alone	78	0.1
Two or More Races	835	1.1
RELATIONSHIP		
Total population	76,201	100.0
In households	73,104	95.9
Householder	27,725	36.4
Spouse [6]	10,920	14.3
Child	21,504	28.2
Own child under 18 years	16,506	21.7
Other relatives	6,118	8.0
Under 18 years	2,628	3.4
65 years and over	455	0.6
Nonrelatives	6,837	9.0
Under 18 years	289	0.4
65 years and over	101	0.1
Unmarried partner	1,835	2.4
In group quarters	3,097	4.1
Institutionalized population	2,822	3.7

Male	1,673	2.2
Female	1,149	1.5
Noninstitutionalized population	275	0.4
Male	118	0.2
Female	157	0.2
HOUSEHOLDS BY TYPE		
Total households	27,725	100.0
Family households (families) [7]	16,702	60.2
With own children under 18 years	8,279	29.9
Husband-wife family	10,920	39.4
With own children under 18 years	5,023	18.1
Male householder, no wife present	1,504	5.4
With own children under 18 years	639	2.3
Female householder, no husband present	4,278	15.4
With own children under 18 years	2,617	9.4
Nonfamily households [7]	11,023	39.8
Householder living alone	7,784	28.1
Male	3,529	12.7
65 years and over	528	1.9
Female	4,255	15.3
65 years and over	1,503	5.4
Households with individuals under 18 years	9,448	34.1
Households with individuals 65 years and over	5,041	18.2
Average household size	2.64	(X)
Average family size [7]	3.31	(X)
HOUSING OCCUPANCY		
Total housing units	30,582	100.0
Occupied housing units	27,725	90.7
Vacant housing units	2,857	9.3
For rent	1,597	5.2
Rented, not occupied	123	0.4
For sale only	222	0.7
Sold, not occupied	76	0.2
For seasonal, recreational, or occasional use	188	0.6
All other vacants	651	2.1
Homeowner vacancy rate (percent) [8]	1.6	(X)
Rental vacancy rate (percent) [9]	9.9	(X)
HOUSING TENURE		

Occupied housing units	27,725	100.0
Owner-occupied housing units	13,370	48.2
Population in owner-occupied housing units	37,550	(X)
Average household size of owner-occupied units	2.81	(X)
Renter-occupied housing units	14,355	51.8
Population in renter-occupied housing units	35,554	(X)
Average household size of renter-occupied units	2.48	(X)

X Not applicable.

[1] Other Asian alone, or two or more Asian categories.

[2] Other Pacific Islander alone, or two or more Native Hawaiian and Other Pacific Islander categories.

[3] One of the four most commonly reported multiple-race combinations nationwide in Census 2000.

[4] In combination with one or more of the other races listed. The six numbers may add to more than the total population, and the six percentages may add to more than 100 percent because individuals may report more than one race.

[5] This category is composed of people whose origins are from the Dominican Republic, Spain, and Spanish-speaking Central or South American countries. It also includes general origin responses such as "Latino" or "Hispanic."

[6] "Spouse" represents spouse of the householder. It does not reflect all spouses in a household. Responses of "same-sex spouse" were edited during processing to "unmarried partner."

[7] "Family households" consist of a householder and one or more other people related to the householder by birth, marriage, or adoption. They do not include same-sex married couples even if the marriage was performed in a state issuing marriage certificates for same-sex couples. Same-sex couple households are included in the family households category if there is at least one additional person related to the householder by birth or adoption. Same-sex couple households with no relatives of the householder

present are tabulated in nonfamily households. "Nonfamily households" consist of people living alone and households which do not have any members related to the householder.

[8] The homeowner vacancy rate is the proportion of the homeowner inventory that is vacant "for sale." It is computed by dividing the total number of vacant units "for sale only" by the sum of owner-occupied units, vacant units that are "for sale only," and vacant units that have been sold but not yet occupied; and then multiplying by 100.

[9] The rental vacancy rate is the proportion of the rental inventory that is vacant "for rent." It is computed by dividing the total number of vacant units "for rent" by the sum of the renter-occupied units, vacant units that are "for rent," and vacant units that have been rented but not yet occupied; and then multiplying by 100.

Source: U.S. Census Bureau, 2010 Census.

Bryan TX Metropolitan Statistical Area (MSA)
 ACS Demographic and Housing Estimates: 2009-2013
 Data Set: 2009-2013 American Community Survey 5-Year Estimates
 Survey: American Community Survey

ACS Demographic and Housing Estimates	Estimate	Margin of Error	Percent	Margin of Error
SEX AND AGE				
Total population	231,417	*****	100%	(X)
Male	116,948	+/-199	50.5%	+/-0.1
Female	114,469	+/-199	49.5%	+/-0.1
Under 5 years	14,887	+/-616	+/-6.4%	+/-0.3
5 to 9 years	13,247	+/-1,279	+/-5.7%	+/-0.6
10 to 14 years	13,097	+/-1,302	5.7%	+/-0.6
15 to 19 years	23,198	+/-477	10.0%	+/-0.2
20 to 24 years	46,643	+/-4,911	20.2%	+/-2.1
25 to 29 years	18,829	+/-332	8.1%	+/-0.1
30 to 34 years	14,660	+/-313	6.3%	+/-0.1
35 to 39 years	11,992	+/-1,306	5.2%	+/-0.6
40 to 44 years	11,719	+/-1,258	5.1%	+/-0.5
45 to 49 years	11,557	+/-354	5.0%	+/-0.2
50 to 54 years	11,563	+/-382	5.0%	+/-0.2
55 to 59 years	9,870	+/-914	4.3%	+/-0.4
60 to 64 years	9,110	+/-1,074	3.9%	+/-0.5
65 to 69 years	6,598	+/-933	2.9%	+/-0.4
70 to 74 years	5,072	+/-800	2.2%	+/-0.3

75 to 79 years	3,771	+/-632	1.6%	+/-0.3
80 to 84 years	2,863	+/-552	1.2%	+/-0.2
85 years and over	2,741	+/-559	1.2%	+/-0.2
Median age (years)	23.3	0.3	(X)	(X)
18 years and over	182,669	+/-12,127	78.9%	+/-0.4
21 years and over	154,130	+/-10,133	66.6%	+/-0.3
62 years and over	25,912	+/-3,203	11.2%	+/-0.2
65 years and over	21,045	+/-2,672	9.1%	+/-0.2
18 years and over				
Male	91,854	+/-490	39.2%	+/-0.2
Female	90,815	+/-492	39.7%	+/-0.2
65 years and over				
Male	6,199	+/-201	2.7%	+/-0.1
Female	8,248	+/-234	3.6%	+/-0.1
RACE				
Total population	231,417	*****	231,417	(X)
One race	117,609	+/-2,008	50.8%	+/-0.9
Two or more races	3,181	+/-553	1.4%	+/-0.2
One race				
White	174,450	+/-1,371	75.4%	+/-0.6
Black or African American	26,845	+/-633	11.6%	+/-0.3
American Indian and Alaska Native	852	+/-219	0.4%	+/-0.1
Cherokee tribal grouping	N	N	N	N
Chippewa tribal grouping	N	N	N	N
Navajo tribal grouping	N	N	N	N
Sioux tribal grouping	N	30 N	N	N
Asian	11,164	+/-291	4.8%	0.1
Asian Indian	2,651	+/-519	1.1%	0.2
Chinese	3,676	+/-682	1.6%	0.3
Filipino	303	+/-145	0.1%	0.1
Japanese	81	+/-50	0.1%	0.1
Korean	1,532	+/-388	0.7%	0.2
Vietnamese	800	+/-337	0.3%	0.1
Other Asian	2,121	+/-63	0.9%	0.0
Native Hawaiian and Other Pacific Islander	91	+/-70	0.1%	0.1
Native Hawaiian	N	N	N	N
Guamanian or Chamorro	N	N	N	N
Samoan	N	N	N	N
Other Pacific Islander	N	N	N	N
Some other race	12,914	+/-1,381	5.6%	+/-0.6
Two or more races	5,101	+/-677	2.2%	+/-0.3
White and Black or African American	1,027	+/-360	0.4%	+/-0.2
White and American Indian and Alaska Native	807	+/-329	0.3%	+/-0.1
White and Asian	288	+/-136	0.1%	+/-0.1
Black or African American and American Indian and Alaska Native	107	+/-106	0.1%	+/-0.1
Race alone or in combination with one or more other races				
Total population	231,417	*****	231,417	(X)
White	179,023	+/-1,389	77.4%	+/-0.6
Black or African American	29,036	+/-448	12.5%	+/-0.2
American Indian and Alaska Native	2,245	+/-344	1.0%	+/-0.1

Asian	12,123	+/-247	5.2%	+/-0.1
Native Hawaiian and Other Pacific Islander	144	+/-81	0.1%	+/-0.1
Some other race	14,168	+/-1,457	6.1%	+/-0.6
HISPANIC OR LATINO AND RACE				
Total population	231,417	*****	231,417	(X)
Hispanic or Latino (of any race)	53,216	*****	23.0%	(X)
Mexican	45,610	+/-1,045	19.7%	+/-0.5
Puerto Rican	815	+/-337	0.4%	+/-0.1
Cuban	591	+/-271	0.3%	+/-0.1
Other Hispanic or Latino	6,200		2.7%	+/-0.2
Not Hispanic or Latino	178,201	*****	2.7%	(X)
White alone	137,001	+/-149	59.2%	+/-0.1
Black or African American alone	26,116	+/-535	11.3%	+/-0.2
American Indian and Alaska Native alone	547	+/-120	0.2%	+/-0.1
Asian alone	11,013	+/-273	4.8%	+/-0.1
Native Hawaiian and Other Pacific Islander alone	91	+/-70	0.1%	+/-0.1
Some other race alone	165	+/-96	0.1%	+/-0.1
Two or more races	3,268	+/-561	1.4%	+/-0.2
Two races including Some other race	174	+/-101	0.1%	+/-0.1
Two races excluding Some other race, and Three or more races	3,094	+/-528	1.3%	+/-0.2

Source: U.S. Census Bureau, 2009-2013 American Community Survey

Appendix – A City of Bryan Fair Housing Ordinance

CITY OF BRYAN CODE OF ORDINANCES: CHAPTER 58, ARTICLE II. DISCRIMINATION

FAIR HOUSING

Sec. 58-40. Declaration of policy.

(a) 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 or her race, color, religion, sex, familial status or national origin.

(b) It is further declared that this policy is based upon a recognition of the right of every person to have access to adequate housing of his or her own choice without regard to race, color, sex, religion, familial status or national origin, and further that the denial of such right though considerations based on race, color, sex, religion, familial status or national origin is detrimental to the health, safety, and welfare of the inhabitants of the city and constitutes an unjust denial or deprivation of such rights which is within the power and proper responsibility of government to prevent.

(c) A discriminatory act is committed because of familial status if the act is committed because the person who is the subject of discrimination is:

(1) Pregnant;

(2) Domiciled with an individual younger than 18 years of age in regard to whom the person:

a. Is the parent or legal custodian; or

b. Has the written permission of the parent or legal custodian for domicile with that person.

(3) In the process of obtaining legal custody of an individual younger than 18 years of age.

(d) The provisions of this article relating to familial status do not apply to housing for the elderly, as described in V.T.C.A., Property Code § 301.043.

(Code 1975, § 9-1; Code 1988, § 13-46)

Sec. 58-41. Definitions.

The following words, terms and phrases, when used in this article, shall have the meanings ascribed to them in this section, except where the context clearly indicates a different meaning:

Disability shall mean 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 of 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.

Discriminatory housing practice shall mean an act that is unlawful under sections 58-42 through 58-44.

Dwelling shall mean any building, structure or portion thereof which is occupied as, or designed and intended for occupancy as, a residence by one or more families, and any vacant land which is offered for sale or lease for the construction or location thereon of any such building, structure or portion thereof.

Family shall include a single individual.

Person shall mean:

(1) An individual;

(2) A corporation, partnership, association, unincorporated organization, labor organization, mutual company, joint stock company, and trust; and

(3) A legal representative, a trustee, a trustee in a case under title 11, USC, a receiver, and a fiduciary.

To rent shall include to lease, sublease, to let and otherwise to grant for consideration the right to occupy premises not owned by the occupant.

(Code 1975, § 9-2; Code 1988, § 13-47)

Sec. 58-42. Discrimination in the sale or rental of housing.

Except as exempted by section 58-45, it shall be unlawful:

(1) To refuse the sale or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status or national origin.

(2) To discriminate against any person in the terms, conditions or privileges of sale or rental of a dwelling, or in the provisions of services or facilities in connection therewith, because of race, color, religion, sex, familial status or national origin.

(3) To make, print or publish or cause to be made, printed or published any notice, statement or advertisement, with respect to the sale or rental of a dwelling unit that indicates any preference, limitation or discrimination based on race, color, religion, sex, disability, familial status or national origin, or any intention to make any such preference, limitation or discrimination.

(4) To represent to any person because of race, color, religion, sex, disability, familial status or national origin that any dwelling is not available for inspection, sale or rental when such dwelling is in fact so available.

(5) For profit, or with the hope of expectation of profit, to induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, sex, disability, familial status or national origin.

(6) To discriminate in any other manner prohibited by V.T.C.A., Property Code ch. 301, including, but not limited to V.T.C.A., Property Code § 301.025, pertaining to discrimination because of disability.

(Code 1975, § 9-3; Code 1988, § 13-48)

State law references: Fair housing, V.T.C.A., Local Government Code § 214.903.

Sec. 58-43. Discrimination in the financing of housing.

It shall be unlawful for any bank, building and loan association, insurance company or other corporation, association, firm or enterprise whose business consists in whole or in part in the making of commercial real estate loans, to deny a loan or other financial assistance to a person applying therefor for the purpose of purchasing, constructing, improving, repairing or maintaining a dwelling, or to discriminate against him or her in the fixing of the amount, interest rate, duration or other terms or conditions of such loan or other financial assistance, because of the race, color, religion, sex, disability, familial status or national origin of such person or of any person associated with him or her in connection with such loan or other financial assistance or the purposes of such loan or other financial assistance, or of the present or prospective owners, lessees, tenants or occupants of the dwelling or dwellings in relation to which such loan or other financial assistance is to be made or given.

(Code 1975, § 9-4; Code 1988, § 13-49)

Sec. 58-44. Discrimination in the provisions of brokerage services.

It shall be unlawful to deny any person access to or membership or participation in any multiple listing service, real estate brokers organization or other service organization or facility relating to the business of selling or renting dwellings, or to discriminate against him or her in the terms or conditions of such access, membership or participation on account of race, color, religion, sex, disability, familial status or national origin.

(Code 1975, § 9-5; Code 1988, § 13-50)

Sec. 58-45. Exemptions and exclusions.

(a) There shall be exempted from the application of section 58-42:

(1) Any single-family house sold or rented by an owner; provided, that such private individual owner does not own more than three such single-family houses, wherever located, at any one time; provided further, that in the case of the sale of any such single-family house by a private individual owner not residing in such house at the time of such sale or who was not the most recent resident of such house prior to such sale, the exemption granted by this subsection shall apply only with respect to one such sale within any 24-month period; provided further, that such bona fide private individual owner does not own

any interest in nor is there owned or reserved on his or her behalf, under any express or voluntary agreement, title to or any right to all or a portion of the proceeds from the sale or rental of, more than three such single-family houses at any one time; provided further, the sale or rental of any such single-family house shall be excepted from the application of this title only if such house is sold or rented:

- a. Without the use in any manner of the sales or rental facilities or the sales or rental services of any real estate broker, agent or salesperson, or of such facilities or services of any person in the business of selling or renting dwellings, or of any employee or agent of any such broker, agent, salesperson or person; and
- b. Without the publication, posting or mailing of any advertisement or written notice in violation of section 58-42(3);

but nothing in this provision shall prohibit the use of attorneys, escrow agents, abstractors, title companies and other such professional assistance as necessary to perfect or transfer the title.

(2) The rental of rooms or units in dwellings containing living quarters occupied or intended to be occupied by no more than four families living independently of each other if the owner actually maintains and occupies one of such living quarters as his or her residence.

(b) Nothing in this chapter shall prohibit a religious organization, association or society or any nonprofit institution or organization operated, supervised or controlled by or in conjunction with a religious organization, association or society, from limiting the sale, rental or occupancy of dwellings which it owns or operates for other than a commercial purpose to persons of the same religion or from giving preference to such persons, unless membership in such religion is restricted on account of race, color, sex, disability, familial status or national origin.

(c) Nothing in this article shall prohibit a private club not in fact open to the public, which as an incident to its primary purpose or purposes provides lodgings which it owns or operates for other than a commercial purpose, from limiting the rental or occupancy of such lodgings to its members.

(Code 1975, § 9-6; Code 1988, § 13-51)

Sec. 58-46. Complaints.

(a) Any person who claims to have been injured by a discriminatory housing practice or believes that he or she will be injured by a discriminatory housing practice that is about to occur (hereafter referred to as "person aggrieved") may file a complaint with the city attorney. Such complaints shall be in writing and shall identify the person alleged to have committed or alleged to be about to commit the discriminatory housing practice and shall set forth the particulars thereof.

(b) The city attorney shall receive and accept notification and referral of complaints from the Secretary of Housing and Urban Development pursuant to the provisions of Title VIII, Fair Housing Act of 1968, Public Law 90-284, and shall treat such complaints in the same manner as complaints filed directly by the person aggrieved.

(c) All complaints shall be filed within one year following the occurrence of an alleged discriminatory housing practice. Upon the filing of any complaint, the city attorney shall provide notice of the complaint by furnishing a copy of such complaint to the person or persons named therein who allegedly committed or were threatening to commit an alleged discriminatory housing practice. The accused may file an answer to the complaint within 15 days of receipt of the written complaint.

(d) All complaints and answers shall be subscribed and sworn to before an officer authorized to administer oaths.

(Code 1975, § 9-7; Code 1988, § 13-52)

Sec. 58-47. Investigation, conciliation and prosecution.

(a) Upon the filing of a complaint as herein provided, the city attorney shall cause to be made a prompt investigation of the matter stated in the complaint.

(b) During or after the investigation, but subsequent to the mailing of the notice of complaint, the city attorney shall, if it appears that a discriminatory housing practice has occurred or is threatening to occur, attempt by informal endeavors to effect conciliation, including voluntary discontinuance of the

discriminatory housing practice and adequate assurance of future voluntary compliance with the provisions of this article.

(c) Upon completion of the investigation and informal endeavors at conciliation by the city attorney, but within 30 days of the filing of the complaint with the city attorney, if the efforts of the city attorney to secure voluntary compliance have been unsuccessful, and if the city attorney has made a determination that a discriminatory housing practice has in fact occurred, such violation shall be prosecuted in the municipal court of the city. If the city attorney determines to prosecute, he or she shall cause to be instituted a complaint and prosecute same to conclusion within 60 days after such determination, or as soon thereafter as practicable.

(d) If the city attorney determines that there is not probable cause to believe that a particular alleged or suspected discriminatory housing practice has been committed, the city attorney shall take no further action with respect to that alleged or suspected offense. In such case the person filing the complaint shall be notified by the city attorney and informed of any alternate action he or she may take.

(e) This article is cumulative in its legal effect and is not in lieu of any and all other legal remedies which the person aggrieved may pursue.

(Code 1975, § 9-8; Code 1988, § 13-53)

Sec. 58-48. Unlawful intimidation.

It shall be unlawful for any person to harass, threaten, harm, damage or otherwise penalize any individual, group or business because he or she have complied with the provisions of this article, because he or she have exercised his or her rights under this article, or enjoyed the benefits of this article or because he or she have made a charge, testified or assisted in any manner in any investigation, or in any proceeding hereunder or have made any report to the city attorney.

(Code 1975, § 9-9; Code 1988, § 13-54)

Sec. 58-49. Penalties.

Any person violating the terms and provisions of this article shall be deemed guilty of a misdemeanor and, upon conviction, shall be fined in a sum not to exceed the penalty as set forth by the city council in section 1-14. Each day a violation continues after passage of 30 days from date of filing of the initial complaint with the city attorney shall constitute a separate and distinct offense.

(Code 1975, § 9-10; Code 1988, § 13-55)

Appendix – B FFIEC HMDA List of Financial Institutions

FDIC Bryan, TX Institutions						
Cert#	Main Branch	Institution	Address	City	State	Zip
58309		American Momentum Bank	1119 E. Villa Maria Road	Bryan	TX	77802
9846		Branch Banking and Trust Company	1660 Briarcrest Drive	Bryan	TX	77802
9846		Branch Banking and Trust Company	201 South Texas Avenue	Bryan	TX	77803
9846		Branch Banking and Trust Company	1001 West Via Maria Road	Bryan	TX	77805
16817		Citizens Bank	3111 University Drive East	Bryan	TX	77802
19048		Compass Bank	1200 Briarcrest Drive	Bryan	TX	77802
5551		Extraco Banks, National Association	2706 South Texas Avenue	Bryan	TX	77802
3269		First National Bank of Huntsville	4282 Boonville Road, Suite 200	Bryan	TX	77802
3285		First National Bank Texas	725 East Villa Maria Road	Bryan	TX	77802
3285		First National Bank Texas	2200 Briarcrest Drive, Suite 105	Bryan	TX	77802
3285		First National Bank Texas	1609 North Texas Avenue	Bryan	TX	77803
3285		First National Bank Texas	643 N Harvey Mitchell Pkwy	Bryan	TX	77807
3285		First National Bank Texas	2303 Booneville Road	Bryan	TX	77808
16895		First State Bank of Bédias	12500 E. Highway 21	Bryan	TX	77808
1208		Guaranty Bank & Trust, N.A.	2800 South Texas Avenue, Suite 140	Bryan	TX	77802
628		JPMorgan Chase Bank, National Association	2335 Booneville Rd	Bryan	TX	77808
22752		Lubbock National Bank	601 East Villa Maria Road, Suite 200	Bryan	TX	77802
16835		Prosperity Bank	2807 Texas Avenue	Bryan	TX	77802
16835		Prosperity Bank	3333 University Drive East	Bryan	TX	77802
16835		Prosperity Bank	3710 East 29th Street	Bryan	TX	77802
16835		Prosperity Bank	1500 North Texas Avenue	Bryan	TX	77803
58249		The Bank & Trust of Bryan/College Station	2900 South Texas Avenue	Bryan	TX	77802
58249	M	The Bank & Trust of Bryan/College Station	1716 Briarcrest Drive, Suite 400	Bryan	TX	77802
58249		The Bank & Trust of Bryan/College Station	3400 Hwy 21 E	Bryan	TX	77808
3511		Wells Fargo Bank, National Association	3000 Briarcrest Drive	Bryan	TX	77802
3511		Wells Fargo Bank, National Association	501 N Harvey Mitchell Pkwy	Bryan	TX	77807
26 Total Offices Located in Bryan, TX						
Source: https://www2.fdic.gov/idasp/main.asp						

Appendix – C FFIEC HMDA Disposition of Loan Data

AGGREGATE TABLE 4-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2013

Page 1 of 2

MSA/MD: 17780 - COLLEGE STATION-BRYAN, TX

RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	1	58	1	58								
MALE												
FEMALE	1	58	1	58								
JOINT (MALE/FEMALE)												
ASIAN (TOTAL)	108	19342	84	15576	7	1111	10	1297	4	629	3	729
MALE	41	6877	32	5728	2	160	6	837	1	152		
FEMALE	22	3296	17	2751	2	118	2	217	1	210		
JOINT (MALE/FEMALE)	45	9169	35	7097	3	833	2	243	2	267	3	729
BLACK OR AFRICAN AMERICAN (TOTAL)	87	8509	26	4185	21	1602	37	2385	1	103	2	234
MALE	37	4836	13	3119	3	157	19	1325	1	103	1	132
FEMALE	34	1992	8	374	13	877	13	741				
JOINT (MALE/FEMALE)	16	1681	5	692	5	568	5	319			1	102
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	3	333	1	114			1	100			1	119
MALE	1	114	1	114								
FEMALE	1	119									1	119
JOINT (MALE/FEMALE)	1	100					1	100				
WHITE (TOTAL)	2320	367992	1735	293138	195	21866	256	32168	121	19037	13	1783
MALE	662	101607	467	75712	77	7802	78	11974	34	5463	6	656
FEMALE	339	38029	234	28826	30	2559	54	4164	20	2344	1	136
JOINT (MALE/FEMALE)	1313	227410	1032	187842	86	11395	122	15952	67	11230	6	991
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	26	4089	18	3143	3	318	4	336	1	292		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	26	4089	18	3143	3	318	4	336	1	292		
RACE NOT AVAILABLE (TOTAL) 6/	445	87251	329	69722	29	6201	49	5632	31	4764	7	932
MALE	36	8768	17	3329	7	3891	9	1116	3	432		
FEMALE	29	3547	13	2125	5	408	5	190	3	361	3	463
JOINT (MALE/FEMALE)	48	6297	27	3744	5	548	11	1097	4	753	1	155

Report Date: 06/02/2014

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ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	222	21808	110	14008	36	1926	56	3782	14	1597	6	495
MALE	91	9575	48	6527	16	809	20	1497	5	517	2	225
FEMALE	48	4064	22	2446	9	492	11	455	5	527	1	144
JOINT (MALE/FEMALE)	83	8169	40	5035	11	625	25	1830	4	553	3	126
NOT HISPANIC OR LATINO (TOTAL)	2249	368816	1710	295207	181	22156	234	30926	110	18013	14	2514
MALE	637	103164	462	78224	62	6984	77	12192	31	5201	5	563
FEMALE	346	39447	238	29630	37	3052	54	4540	15	1970	2	255
JOINT (MALE/FEMALE)	1264	225697	1008	186845	82	12120	103	14194	64	10842	7	1696
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	54	7287	36	5379	6	430	9	914	3	564		
MALE	1	61			1	61						
FEMALE												
JOINT (MALE/FEMALE)	53	7226	36	5379	5	369	9	914	3	564		
ETHNICITY NOT AVAILABLE (TOTAL) 6/	465	89663	338	71342	32	6586	58	6296	31	4651	6	788
MALE	48	9402	20	3251	10	4156	15	1563	3	432		
FEMALE	32	3530	13	2058	4	418	9	317	4	418	2	319
JOINT (MALE/FEMALE)	49	7654	33	5259	4	548	8	1109	3	583	1	155
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	2037	336894	1583	272063	151	19191	192	27389	103	16819	8	1432
MALE	563	91335	416	68913	57	6667	57	10378	29	4946	4	431
FEMALE	292	34085	212	26380	23	2123	42	3686	14	1760	1	136
JOINT (MALE/FEMALE)	1181	211098	954	176394	71	10401	93	13325	60	10113	3	865
OTHERS, INCLUDING HISPANIC (TOTAL)	494	60701	272	42016	73	5387	114	8536	23	3185	12	1577
MALE	170	21406	93	15431	22	1187	45	3659	7	772	3	357
FEMALE	106	9529	48	5629	24	1487	26	1413	6	737	2	263
JOINT (MALE/FEMALE)	218	29766	131	20956	27	2713	43	3464	10	1676	7	957
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	122	7591	42	3579	17	565	55	2959	7	381	1	107
50-79% OF MSA/MD MEDIAN	297	25434	169	16318	56	3548	59	3886	12	1485	1	197
80-99% OF MSA/MD MEDIAN	227	24097	145	17302	31	2076	30	2535	16	1862	5	322
100-119% OF MSA/MD MEDIAN	219	27200	151	20223	21	2188	33	2819	11	1580	3	390
120% OR MORE OF MSA/MD MEDIAN	1939	359321	1522	287064	120	21843	173	28654	108	18979	16	2781
INCOME NOT AVAILABLE 6/	186	43931	165	41450	10	878	7	1065	4	538		
TOTAL 14/	2990	487574	2194	385936	255	31098	357	41918	158	24825	26	3797

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE																				
ASIAN	1	9			1	9	2	18	1	9	1	9	2	18			3	27	11	100
BLACK OR AFRICAN AMERICAN	3	19	1	6	8	50											4	25	16	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1	33							1	33	1	33							3	100
WHITE	33	18	1	1	43	23	27	15	9	5	14	8	22	12	3	2	34	18	186	100
2 OR MORE MINORITY RACES																				
JOINT (WHITE/MINORITY RACE)	1	33			2	67													3	100
RACE NOT AVAILABLE 6/	7	18	2	5	9	23	8	20	1	3	3	8	4	10	1	3	5	13	40	100
ETHNICITY 7/																				
HISPANIC OR LATINO	3	8	2	5	13	34	3	8	2	5	2	5	5	13	1	3	7	18	38	100
NOT HISPANIC OR LATINO	31	18	2	1	42	24	25	14	9	5	14	8	21	12	2	1	31	18	177	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	20			1	20	1	20	1	20							1	20	5	100
ETHNICITY NOT AVAILABLE 8/	11	28			7	18	8	21			3	8	2	5	1	3	7	18	39	100
MINORITY STATUS 8/																				
WHITE NON-HISPANIC	28	19	1	1	33	22	23	15	7	5	13	9	19	13	2	1	25	17	151	100
OTHERS, INCL. HISPANIC	9	13	3	4	24	33	6	8	4	6	3	4	7	10	1	1	15	21	72	100
GENDER 19/																				
MALE	15	17	2	2	23	26	11	12	2	2	5	6	10	11	2	2	19	21	89	100
FEMALE	12	32			8	22	3	8	3	8	3	8	4	11			4	11	37	100
JOINT (MALE/FEMALE)	13	12	2	2	29	26	16	15	7	6	9	8	12	11	1	1	21	19	110	100
GENDER NOT AVAILABLE 6/	6	26			3	13	7	30			2	9	2	9	1	4	2	9	23	100
INCOME 9/																				
LESS THAN 50% OF MSA/MD MEDIAN	11	37			7	23	2	7	3	10	1	3	2	7	1	3	3	10	30	100
50-79% OF MSA/MD MEDIAN	4	13	2	6	16	50	2	6	1	3	1	3	3	9	1	3	2	6	32	100
80-99% OF MSA/MD MEDIAN	3	15	1	5	6	30	1	5			1	5	3	15			5	25	20	100
100-119% OF MSA/MD MEDIAN	4	20			7	35	2	10			2	10	1	5			4	20	20	100
120% OR MORE OF MSA/MD MEDIAN	22	14	1	1	27	18	30	20	8	5	14	9	18	12	2	1	31	20	153	100
INCOME NOT AVAILABLE 6/	2	50											1	25			1	25	4	100

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RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	1	160					1	160				
MALE												
FEMALE												
JOINT (MALE/FEMALE)	1	160					1	160				
ASIAN (TOTAL)	5	693	4	588			1	107				
MALE	3	345	2	238			1	107				
FEMALE	1	189	1	189								
JOINT (MALE/FEMALE)	1	159	1	159								
BLACK OR AFRICAN AMERICAN (TOTAL)	52	6941	38	4811	1	128	7	752	7	984	1	266
MALE	17	2208	11	1444			3	342	3	420		
FEMALE	19	2342	15	1882			2	227	2	253		
JOINT (MALE/FEMALE)	16	2393	10	1505	1	128	2	183	2	311	1	266
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	1	182	1	182								
MALE	1	182	1	182								
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	761	121128	561	91074	38	5244	82	12544	72	10542	10	1722
MALE	279	42174	194	29672	15	1771	35	5368	31	4931	4	432
FEMALE	140	20089	115	16707	3	437	11	1312	11	1633		
JOINT (MALE/FEMALE)	342	58863	252	44695	18	3036	36	5864	30	3978	6	1290
2 OR MORE MINORITY RACES (TOTAL)	2	341	2	341								
MALE												
FEMALE	2	341	2	341								
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	14	2413	12	2156	1	162	1	95				
MALE	1	92	1	92								
FEMALE	3	503	3	503								
JOINT (MALE/FEMALE)	10	1818	8	1561	1	162	1	95				
RACE NOT AVAILABLE (TOTAL) 6/	98	14408	58	8441	5	640	15	2087	20	3238		
MALE	17	2395	5	691	2	234	5	732	5	738		
FEMALE	4	470	4	470								
JOINT (MALE/FEMALE)	15	2219	5	857	2	290	1	58	7	1014		

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ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	137	19021	99	14084	6	437	17	2495	14	1920	1	85
MALE	66	9173	46	6556	4	300	9	1322	6	910	1	85
FEMALE	22	2984	21	2854			1	130				
JOINT (MALE/FEMALE)	49	6864	32	4674	2	137	7	1043	8	1010		
NOT HISPANIC OR LATINO (TOTAL)	674	108627	501	82337	30	4572	74	11019	60	8953	9	1746
MALE	237	36099	163	25108	11	1471	32	4787	28	4386	3	347
FEMALE	142	20294	114	16562	3	437	12	1409	13	1886		
JOINT (MALE/FEMALE)	295	52234	224	40667	16	2664	30	4823	19	2681	6	1399
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	29	4674	17	2804	3	579	3	436	5	598	1	157
MALE	1	92	1	92								
FEMALE												
JOINT (MALE/FEMALE)	28	4482	16	2712	3	579	3	436	5	598	1	157
ETHNICITY NOT AVAILABLE (TOTAL) 6/	94	14040	57	8366	4	586	13	1795	20	3293		
MALE	14	2030	4	563	2	234	3	440	5	793		
FEMALE	5	656	5	656								
JOINT (MALE/FEMALE)	13	2032	4	724	1	236	1	58	7	1014		
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	601	98121	449	74803	28	4282	64	9888	52	7888	8	1480
MALE	213	32934	149	23185	11	1471	26	4046	24	3885	3	347
FEMALE	118	17105	94	13853	3	437	10	1182	11	1633		
JOINT (MALE/FEMALE)	270	48082	206	37565	14	2374	28	4640	17	2370	5	1133
OTHERS, INCLUDING HISPANIC (TOTAL)	237	33855	169	24749	11	1306	28	3790	26	3502	3	508
MALE	88	11998	61	8512	4	300	13	1771	9	1330	1	85
FEMALE	47	6359	42	5749			3	357	2	253		
JOINT (MALE/FEMALE)	102	15498	66	10488	7	1006	12	1662	15	1919	2	423
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	32	3237	10	987	4	329	14	1600	2	183	2	138
50-79% OF MSA/MD MEDIAN	197	23776	143	17550	9	835	22	2867	22	2426	1	98
80-99% OF MSA/MD MEDIAN	158	21926	120	16813	7	1010	11	1346	19	2582	1	175
100-119% OF MSA/MD MEDIAN	127	19942	91	14208	4	704	14	2131	16	2475	2	424
120% OR MORE OF MSA/MD MEDIAN	411	75903	305	57183	19	3296	43	7339	39	6932	5	1153
INCOME NOT AVAILABLE 6/	9	1478	5	850			3	462	1	166		
TOTAL 14/	934	146262	674	107591	43	6174	107	15745	99	14764	11	1988

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE					1	100													1	100
ASIAN																				
BLACK OR AFRICAN AMERICAN					3	100													3	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND																				
WHITE	24	28	3	4	28	33	6	7	6	7	6	7	3	4			9	11	85	100
2 OR MORE MINORITY RACES																				
JOINT (WHITE/MINORITY RACE)	1	50									1	50							2	100
RACE NOT AVAILABLE 6/	3	33			2	22	1	11	1	11	2	22							9	100
ETHNICITY 7/																				
HISPANIC OR LATINO	5	26			7	37	2	11	2	11	1	5	1	5			1	5	19	100
NOT HISPANIC OR LATINO	19	28	3	4	24	35	4	6	4	6	5	7	1	1			8	12	68	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	17			2	33					2	33	1	17					6	100
ETHNICITY NOT AVAILABLE 6/	3	43			1	14	1	14	1	14	1	14							7	100
MINORITY STATUS 8/																				
WHITE NON-HISPANIC	19	30	3	5	20	32	4	6	4	6	4	6	1	2			8	13	63	100
OTHERS, INCL. HISPANIC	6	21			12	43	2	7	2	7	3	11	2	7			1	4	28	100
GENDER 19/																				
MALE	13	29	2	4	17	38	2	4	4	9	2	4	1	2			4	9	45	100
FEMALE	3	20			5	33	1	7	2	13							4	27	15	100
JOINT (MALE/FEMALE)	10	27	1	3	12	32	3	8	1	3	7	19	2	5			1	3	37	100
GENDER NOT AVAILABLE 6/	2	67					1	33											3	100
INCOME 9/																				
LESS THAN 50% OF MSA/MD MEDIAN	6	46			3	23	1	8	1	8	1	8					1	8	13	100
50-79% OF MSA/MD MEDIAN	6	21	1	4	8	29	2	7	4	14	2	7	1	4			4	14	28	100
80-99% OF MSA/MD MEDIAN	4	36			3	27	2	18			1	9					1	9	11	100
100-119% OF MSA/MD MEDIAN	2	20			4	40	1	10	1	10			1	10			1	10	10	100
120% OR MORE OF MSA/MD MEDIAN	10	28	2	6	14	39	1	3	1	3	5	14	1	3			2	6	36	100
INCOME NOT AVAILABLE 6/					2	100													2	100

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RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	2	71	1	63			1	8				
MALE	1	63	1	63								
FEMALE	1	8					1	8				
JOINT (MALE/FEMALE)												
ASIAN (TOTAL)	4	525	2	280					1	125	1	120
MALE												
FEMALE	4	525	2	280					1	125	1	120
JOINT (MALE/FEMALE)												
BLACK OR AFRICAN AMERICAN (TOTAL)	39	907	11	259			27	548	1	100		
MALE	14	188	5	79			9	109				
FEMALE	14	107	3	16			11	91				
JOINT (MALE/FEMALE)	10	602	3	164			6	338	1	100		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	1	3					1	3				
MALE												
FEMALE	1	3					1	3				
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	302	19984	167	14198	22	1286	100	3977	10	408	3	115
MALE	82	4757	34	2649	11	678	34	1345	3	85		
FEMALE	75	2231	36	1324	3	96	30	556	4	165	2	90
JOINT (MALE/FEMALE)	144	12905	97	10225	7	421	36	2076	3	158	1	25
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	3	38					3	38				
MALE												
FEMALE												
JOINT (MALE/FEMALE)	3	38					3	38				
RACE NOT AVAILABLE (TOTAL) 8/	28	2780	11	2457	2	38	12	128	3	157		
MALE	6	141	1	20	1	22	2	20	2	79		
FEMALE	3	22					3	22				
JOINT (MALE/FEMALE)												

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ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	45	1087	8	96	1	25	35	908	2	33	1	25
MALE	17	498	2	25			13	440	2	33		
FEMALE	16	188	2	14	1	25	13	147				
JOINT (MALE/FEMALE)	12	403	2	57			9	321			1	25
NOT HISPANIC OR LATINO (TOTAL)	289	18605	166	13095	20	1170	90	3532	10	598	3	210
MALE	80	4545	38	2774	11	678	29	1013	2	80		
FEMALE	79	2653	38	1557	2	71	31	525	5	290	3	210
JOINT (MALE/FEMALE)	130	11407	90	8764	7	421	30	1994	3	228		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	13	1625	7	1488			5	127	1	30		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	13	1625	7	1488			5	127	1	30		
ETHNICITY NOT AVAILABLE (TOTAL) 6/	32	2991	13	2598	3	129	14	135	2	129		
MALE	6	108	1	12	1	22	3	21	1	51		
FEMALE	3	57	1	49			2	8				
JOINT (MALE/FEMALE)	2	110	1	100			1	10				
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	245	17138	152	12493	20	1170	63	3010	8	373	2	90
MALE	65	4292	32	2632	11	678	20	902	2	80		
FEMALE	59	1999	33	1261	2	71	18	412	4	165	2	90
JOINT (MALE/FEMALE)	121	10845	87	8600	7	421	25	1696	2	128		
OTHERS, INCLUDING HISPANIC (TOTAL)	103	4185	27	2166	1	25	68	1561	5	288	2	145
MALE	32	749	8	167			22	549	2	33		
FEMALE	35	826	7	310	1	25	25	246	1	125	1	120
JOINT (MALE/FEMALE)	35	2600	12	1689			20	756	2	130	1	25
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	38	875	8	370			29	455			1	50
50-79% OF MSA/MD MEDIAN	69	1748	22	605	5	217	37	758	5	168		
80-99% OF MSA/MD MEDIAN	35	1602	14	901			20	661			1	40
100-119% OF MSA/MD MEDIAN	31	1077	16	489	1	21	13	516	1	51		
120% OR MORE OF MSA/MD MEDIAN	193	16729	121	12741	18	1086	44	2277	8	480	2	145
INCOME NOT AVAILABLE 8/	13	2277	11	2151			1	35	1	91		
TOTAL 14/	379	24308	192	17257	24	1324	144	4702	15	790	4	235

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
RACE 5/																					
AMERICAN INDIAN/ALASKA NATIVE	1	50			1	50														2	100
ASIAN																					
BLACK OR AFRICAN AMERICAN	3	10			25	86											1	3		29	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1	50			1	50														2	100
WHITE	30	24	2	2	64	51	14	11			2	2	1	1			12	10		125	100
2 OR MORE MINORITY RACES																					
JOINT (WHITE/MINORITY RACE)	1	25			3	75														4	100
RACE NOT AVAILABLE 6/	7	33			10	48							1	5			3	14		21	100
ETHNICITY 7/																					
HISPANIC OR LATINO	12	26			27	59	3	7			2	4					2	4		46	100
NOT HISPANIC OR LATINO	23	21	2	2	60	56	10	9					1	1			12	11		108	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	13			5	63	1	13									1	13		8	100
ETHNICITY NOT AVAILABLE 6/	7	33			12	57							1	5			1	5		21	100
MINORITY STATUS 8/																					
WHITE NON-HISPANIC	18	24	2	3	35	46	10	13					1	1			10	13		76	100
OTHERS, INCL. HISPANIC	17	20			58	69	4	5			2	2					3	4		84	100
GENDER 19/																					
MALE	13	22	2	3	31	53	7	12			1	2					4	7		58	100
FEMALE	17	26			41	63	1	2					1	2			5	8		65	100
JOINT (MALE/FEMALE)	9	19			26	54	6	13			1	2					6	13		48	100
GENDER NOT AVAILABLE 6/	4	33			6	50							1	8			1	8		12	100
INCOME 9/																					
LESS THAN 50% OF MSA/MD MEDIAN	17	35			26	54											5	10		48	100
50-79% OF MSA/MD MEDIAN	11	25	1	2	29	66							1	2			2	5		44	100
80-99% OF MSA/MD MEDIAN	6	24			12	48	2	8			2	8	1	4			2	8		25	100
100-119% OF MSA/MD MEDIAN					9	64	3	21									2	14		14	100
120% OR MORE OF MSA/MD MEDIAN	9	17	1	2	28	54	9	17									5	10		52	100
INCOME NOT AVAILABLE 6/																					

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RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	18	1961	6	922	3	218	5	384	2	253	2	184
MALE	11	1345	3	632	1	37	4	348	2	253	1	75
FEMALE	4	419	2	201	1	109					1	109
JOINT (MALE/FEMALE)	3	197	1	89	1	72	1	36				
ASIAN (TOTAL)	120	19572	85	13941	3	421	14	2185	14	2363	4	662
MALE	55	8438	38	5620	1	124	8	1284	7	1262	1	148
FEMALE	15	2083	10	1528			1	111	2	190	2	254
JOINT (MALE/FEMALE)	50	9051	37	6793	2	297	5	790	5	911	1	260
BLACK OR AFRICAN AMERICAN (TOTAL)	93	10760	40	5280	9	1152	28	2457	12	1442	4	429
MALE	28	3244	12	1541	2	211	5	379	6	744	3	369
FEMALE	37	4278	15	1962	4	676	14	1253	3	327	1	60
JOINT (MALE/FEMALE)	28	3238	13	1777	3	265	9	825	3	371		
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND (TOTAL)	7	960	1	52			4	764	1	70	1	74
MALE	4	372	1	52			2	250	1	70		
FEMALE												
JOINT (MALE/FEMALE)	3	588					2	514			1	74
WHITE (TOTAL)	2720	414386	1649	257579	174	26767	458	65527	294	44386	145	20127
MALE	799	115361	437	65319	55	7256	165	21870	104	16299	38	4617
FEMALE	437	52688	260	31799	28	2916	68	7758	50	6248	31	3967
JOINT (MALE/FEMALE)	1478	245748	949	160208	91	16595	223	35705	139	21697	76	11543
2 OR MORE MINORITY RACES (TOTAL)	1	48					1	48				
MALE												
FEMALE	1	48					1	48				
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	35	5135	22	3519	1	125	8	900	4	591		
MALE	1	123	1	123								
FEMALE												
JOINT (MALE/FEMALE)	34	5012	21	3396	1	125	8	900	4	591		
RACE NOT AVAILABLE (TOTAL) 6/	464	73694	226	34604	16	2689	107	15586	78	13864	37	6951
MALE	52	8896	18	3437			20	2508	10	2197	4	754
FEMALE	27	3049	9	988	2	304	10	975	2	255	4	527
JOINT (MALE/FEMALE)	70	11777	34	6033	2	449	16	2500	11	1596	7	1199

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ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	283	28956	118	13138	17	1991	67	7182	36	3870	25	2775
MALE	111	12281	44	4894	8	805	33	3575	17	1935	9	1072
FEMALE	45	3979	22	1845	3	284	9	747	7	559	4	544
JOINT (MALE/FEMALE)	106	12575	52	6399	5	781	25	2860	12	1376	12	1159
NOT HISPANIC OR LATINO (TOTAL)	2672	418813	1631	260298	172	27132	448	64911	290	45512	133	18960
MALE	797	118863	446	68673	51	6823	159	21536	105	17194	36	4437
FEMALE	457	56728	269	34029	31	3619	76	8689	48	6206	33	4185
JOINT (MALE/FEMALE)	1409	240132	910	156998	89	16200	210	34626	136	21970	64	10338
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	95	13255	64	9489	4	591	15	1625	8	909	4	641
MALE	3	457	2	267					1	190		
FEMALE	1	110	1	110								
JOINT (MALE/FEMALE)	91	12688	61	9112	4	591	15	1625	7	719	4	641
ETHNICITY NOT AVAILABLE (TOTAL) 6/	428	67492	216	32972	13	1658	97	14133	71	12678	31	6051
MALE	39	6378	18	2890			12	1528	7	1506	2	454
FEMALE	18	1748	4	494	1	102	9	709	2	255	2	188
JOINT (MALE/FEMALE)	60	10216	32	5787	2	231	14	2159	7	1101	5	938
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	2381	374346	1472	235457	153	24204	382	57550	255	40158	119	16977
MALE	689	103313	391	60425	47	6451	135	18673	87	14219	29	3545
FEMALE	394	48959	239	29962	24	2530	59	7157	44	5807	28	3503
JOINT (MALE/FEMALE)	1293	221619	839	144817	82	15223	187	31660	123	19990	62	9929
OTHERS, INCLUDING HISPANIC (TOTAL)	611	78281	326	45070	37	4498	134	14687	75	9335	39	4691
MALE	206	25470	98	12718	12	1177	49	5502	33	4409	14	1664
FEMALE	101	10750	49	5597	8	1069	25	2159	11	958	8	967
JOINT (MALE/FEMALE)	303	41940	179	26755	16	2131	60	7026	31	3968	17	2060
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	117	9577	39	2801	9	945	45	3543	19	1964	5	324
50-79% OF MSA/MD MEDIAN	255	24627	127	12219	16	1478	64	6277	36	3476	12	1177
80-99% OF MSA/MD MEDIAN	281	32011	144	16031	19	2350	63	6841	39	4483	16	2306
100-119% OF MSA/MD MEDIAN	278	33952	162	19198	16	1837	53	6780	31	3947	16	2190
120% OR MORE OF MSA/MD MEDIAN	2059	355783	1305	227738	126	21741	303	50401	223	38843	102	17060
INCOME NOT AVAILABLE 6/	468	70566	252	37910	20	3021	97	14009	57	10256	42	5370
TOTAL 14/	3458	526516	2029	315897	206	31372	625	87851	405	62969	193	28427

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APPLICANT CHARACTERISTICS	Debt-to- Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
RACE 5/																					
AMERICAN INDIAN/ALASKA NATIVE	2	40			1	20	2	40												5	100
ASIAN	1	8					1	8			3	23	6	46				2	15	13	100
BLACK OR AFRICAN AMERICAN	2	7			12	41	2	7	4	14			3	10				6	21	29	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	3	60			1	20			1	20										5	100
WHITE	76	18	3	1	74	18	70	17	14	3	36	9	59	14	1	0		79	19	412	100
2 OR MORE MINORITY RACES													1	100						1	100
JOINT (WHITE/MINORITY RACE)			1	14			1	14	1	14			2	29				2	29	7	100
RACE NOT AVAILABLE 6/	11	14			25	32	15	19	2	3	3	4	8	10				13	17	77	100
ETHNICITY 7/																					
HISPANIC OR LATINO	12	20	1	2	17	29	6	10	4	7	5	8	8	14				6	10	59	100
NOT HISPANIC OR LATINO	65	17	3	1	67	17	70	18	15	4	34	9	58	15	1	0		80	20	393	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	5	29			4	24			1	6			3	18				4	24	17	100
ETHNICITY NOT AVAILABLE 8/	13	16			25	31	15	19	2	3	3	4	10	13				12	15	80	100
MINORITY STATUS 8/																					
WHITE NON-HISPANIC	62	18	2	1	53	15	65	19	11	3	31	9	48	14	1	0		70	20	343	100
OTHERS, INCL. HISPANIC	21	17	2	2	35	28	11	9	9	7	8	6	21	17				19	15	126	100
GENDER 19/																					
MALE	28	17	1	1	27	17	24	15	6	4	16	10	30	18				31	19	163	100
FEMALE	12	17			14	20	11	15	4	6	1	1	12	17				17	24	71	100
JOINT (MALE/FEMALE)	48	18	3	1	52	20	48	18	11	4	23	9	29	11	1	0		48	18	263	100
GENDER NOT AVAILABLE 6/	7	13			20	38	8	15	1	2	2	4	8	15				6	12	52	100
INCOME 9/																					
LESS THAN 50% OF MSA/MD MEDIAN	14	39	1	3	11	31	3	8	3	8			1	3				3	8	36	100
50-79% OF MSA/MD MEDIAN	13	24			15	27	9	16	3	5			6	11				9	16	55	100
80-99% OF MSA/MD MEDIAN	16	26			15	25	10	16	3	5	3	5	8	13				6	10	61	100
100-119% OF MSA/MD MEDIAN	6	15			10	25	7	18			1	3	4	10	1	3		11	28	40	100
120% OR MORE OF MSA/MD MEDIAN	44	16	2	1	39	14	58	21	10	4	31	11	41	15				54	19	279	100
INCOME NOT AVAILABLE 6/	2	3	1	1	23	29	4	5	3	4	7	9	19	24				19	24	78	100

Appendix – D HUD FOIA Discrimination Complaints Request Response



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Fort Worth Regional Office, Region VI
Office of the Regional Administrator
801 Cherry Street, Unit 45, Suite 2500
Fort Worth, TX 76102
Phone (817) 978-5965 - Fax (817) 978-5567
www.hud.gov www.espanol.hud.gov

FEB 2 2015

Mr. Art Roach
Community Development Services
City of Bryan
405 W 28th St.
Bryan TX 77803

Subject: Freedom of Information Act (FOIA) Request 15-FI-RO6-00617

Dear Mr. Roach:

This letter is in response to your Freedom of Information Act (FOIA) request dated January 14, 2015. In that request, you asked for a list of fair housing complaints filed in Bryan, Texas from January 1, 2010 through December 31, 2014.

We are granting your request in full, at no cost to you. We have enclosed a list of the complaints filed in Bryan, Texas from January 1, 2010 through December 31, 2014. The list includes the case title, filing date, basis the complaint was filed under, including multiples if filed as such, issue code and closure type.

Under Title 24, Code of Federal Regulations, Section 15.111, you may within 30 days from the date of this letter, request a review of this action. The filing of your request for review may be accomplished by mailing a copy of your request and a copy of this letter. You should also include a statement of the circumstances, reasons or arguments that you wish to advance in support of the disclosure of that portion of the record, which was denied. The envelope containing the request for review and the letter itself should both clearly indicate the subject is a Freedom of Information Act request for review. Review will be made promptly by the General Counsel on the basis of the written record described in Section 15.111.

Please mail to:

US Department of Housing and Urban Development
Attention: FOIA Appeals
Office of Ethics and Personnel Law, ELD
451 7th Street SW, Room 2130
Washington, DC 20410

If you have any questions, please feel free to contact Michael Brown, Public Trust Officer, at (817) 978-5864.

Sincerely,


for Patricia Campbell
FOIA Liaison

Case Number and Name		Violation City	Filing Date	Completion Date	Case Completion Type	Bases	Issues
06-10-0515-8	John H. Witherspoon v. Brazos Valley Council of Governments	Bryan	02/23/10	06/02/10	Withdrawn with Resolution	Disability,	310 - Discriminatory refusal to rent, 380 - Discriminatory terms, conditions, privileges, or services and facilities,
06-10-0609-8	Austin Tenants' Council vs. Aggie Station, et al.	Bryan	03/22/10	04/13/12	Conciliated	Familial Status,	380 - Discriminatory terms, conditions, privileges, or services and facilities,
06-10-0846-8	Dernice Franklin v Sandra L. & James E. Moore	Bryan	05/11/10	06/29/10	No Cause	Race, Disability, Familial Status, Retaliation	382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
06-11-0802-8	Russell Hairston v. Fercan Kalkan, Property Owner	Bryan	04/12/11	04/28/12	No Cause	Sex, Retaliation	310 - Discriminatory refusal to rent, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
06-11-1037-8	Lillian Thurman v Oakwood Mobile Home Community	Bryan	06/01/11	08/12/11	Conciliated	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
06-11-1133-8	W. Keith Bouis v Old Oaks Townhomes	Bryan	06/20/11	07/27/11	No Cause	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 500 - Failure to permit reasonable modification,
06-11-1364-8	Ruben Olague v. Park Hudson Apartments	Bryan	07/28/11	11/18/11	Withdrawn with Resolution	National Origin,	382 - Discrimination in terms/conditions/privileges relating to rental,
06-12-0341-8	Matthew Turner v Marie Salinas	Bryan	12/19/11	03/19/12	Withdrawn with Resolution	Race, Sex,	310 - Discriminatory refusal to rent,
06-12-0633-8	Calvin Simpson v Brazos Valley Council of Governments	Bryan	03/06/12	07/31/12	No Cause	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental, 510 - Failure to make reasonable accommodation,
06-12-1395-8	James Peterson v Brazos Valley Council of Governments	Bryan	09/06/12	10/29/12	Administrative Closure	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities,
06-13-0377-8	De Angela Merida for Millie Burns v Brookside Apartments	Bryan	02/06/13	10/31/13	No Cause	Race,	312 - Discriminatory refusal to rent and negotiate for rental, 380 - Discriminatory terms, conditions, privileges, or services and facilities,
06-13-1064-8	Nichole & Joseph Ruiz v Virginia Castleberry	Bryan	08/09/13	10/18/13	Administrative Closure	National Origin,	381 - Discrimination in terms/conditions/privileges relating to sale, 440 - Other discriminatory acts,
06-13-1118-8	Lynda Hardin-Poston v. Aggieldand RV Park	Bryan	08/28/13	10/30/13	Administrative Closure	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 510 - Failure to make reasonable accommodation,

06-14-0022-8	Ieshia Sheppard v Country Place Apartments	Bryan	10/21/13	03/27/14	No Cause	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 382 - Discrimination in terms/conditions/privileges relating to rental,
06-14-0535-8	Dernice Franklin v Sammy Destefano	Bryan	03/05/14	07/30/14	No Cause	Race, Disability, Sex,	310 - Discriminatory refusal to rent, 380 - Discriminatory terms, conditions, privileges, or services and facilities,

Appendix – E TWC Public Information Discrimination Complaints Request Response

Texas Workforce Commission A Member of Texas Workforce Solutions

March 23, 2015

Art Roach
City of Bryan
Community Development Services
405 W 28th
Bryan, TX 77803

Date Received: 1/20/2015
Request No. : 150120-070

RE: Fair Housing Complaints Originating in Bryan, TX / January 1, 2010-December 31, 2014

Dear Art Roach,

Enclosed is the information that you requested regarding the above-referenced subject.

If you have any questions about the enclosed information, please feel free to contact me at the address listed or call me at the number listed below. When making any further inquiries about this request, please reference the Request No. listed above.

Sincerely,


Maria Rivera
Assistant Disclosure Officer

Cases Originating in Bryan January 1, 2010 to December 31, 2014		
Case Style	Closed Date	Determination
W. Keith Bouis v Old Oak Townhomes	7/22/2011	No Cause Determination
Lillian Thurman v Oakwood Mobile Home Community	8/12/2011	Successful Conciliation
Ruben Olague v Park Hudson Apartments	11/18/2011	Complaint withdrawn by Complainant
Matthew Turner v Marie Salinas	3/19/2012	Complaint withdrawn by Complainant
Russell Hairston v Fercan Kalkan, Owner	4/28/2012	No Cause Determination
Calvin Simpson v Brazos Valley Council of Governments	7/31/2012	No Cause Determination
Joe Bailey v Brazos Beachfront Properties, LP	10/11/2012	Complaint withdrawn by Complainant
James Peterson v Brazos Valley Council of Governments	10/29/2012	Complainant failed to cooperate
Nichole & Joseph Ruiz v Virginia Castleberry	10/18/2013	Complaint withdrawn by Complainant
Lynda Hardin-Poston v AggieLand RV Park	10/30/2013	Complaint withdrawn by Complainant
DeAngela Merida and Millie Burs v Brookside Apartments	10/31/2013	No Cause Determination
Ieshia Sheppard v Country Place Apartments	3/27/2014	No Cause Determination
Dernice Franklin v Sammy Destefano	7/30/2014	No Cause Determination

Appendix – F Affirmative Marketing Policy
Affirmative Fair Housing Marketing Plan
Affirmative Marketing Policy
And Implementing Procedures

Statement of Policy

In accordance with the regulations of 24 CFR 92.351 (a) of the Home Program and in furtherance of the City of Bryan’s commitment to non-discrimination and equal opportunity in housing, the City of Bryan has established procedures to affirmatively market units constructed or rehabilitated through the City’s affordable housing programs. These procedures are intended to further the objectives of Title VIII of the Civil Rights Act of 1968 and Executive Order 11063.

The City of Bryan believes that individuals of similar economic levels in the same housing market area should have available to them a like range of housing choices regardless of their race , color, religion, sex, and national origin.

The City of Bryan is committed to the goals of affirmative marketing which will be implemented through the Community Development Services Department Affordable Housing Assistance Programs. These goals will be reached through the following procedures:

1. **Informing the public, potential tenants, and owners about Federal Fair Housing Laws and Affirmative Marketing Policies:**

The City will inform the public, potential tenants, and poverty owners about this policy and fair housing laws.

The City will:

- Inform the general public by including this information at regular public meetings of the Community Development Advisory Committee.

- Inform potential tenants or purchasers by providing informational fair housing materials during each application intake interview.
- Provide about the program to the local Associations of Realtors, Homebuilders, Lenders, and Apartment Association.
- Inform owners, builders and developers by providing information materials to builders and developers participating in City housing programs.

2. **Inform persons of all racial, ethnic and gender groups of unit availability**

Housing units developed through the City of Bryan’s Affordable Housing Programs will be marketed using the following guidelines.

The City will make information about available properties known by:

- Advertising to the general public in The Eagle which is the newspaper of general circulation.
- Advertise at special outreach events to inform persons otherwise not likely to apply.
- Provide information regarding availabilities at regular public meetings of the Community Development Advisory Committee (CDAC).
- Performing direct outreach to Realtors, lenders, and housing organizations.
- Participating property owners of five or more rental units shall be contractually required to notify Community Development Services as units become available.

3. **Attract and solicit applications for assistance from persons not likely to apply without special outreach**

In order to inform as well as solicit applications from persons in the housing market area who are not likely to apply for units without special outreach, the City has established procedures to reach this objective.

The City has identified African American and Hispanic households as two groups in the housing market area who would probably not apply for the units without special outreach. Having identified these two groups, The Community Development Services Department will undertake special outreach methods as follows:

- For the predominantly African American, the City of Bryan will notify churches serving the African American community in the neighborhood of the development, and request that these organizations inform members of their organizations about the availability of newly-developed housing units and housing assistance programs. Meetings of the CDAC will be scheduled in facilities within areas of African American concentrations to allow participation and dissemination of information about the City’s housing programs and availabilities. These facilities may include schools, churches, and the African American Museum.
- To reach Hispanic households, the City of Bryan will provide information about the availability of newly developed housing units and housing assistance programs to local Spanish Language radio stations and the La Voz Hispana newspaper. Meetings of the CDAC will be scheduled in facilities within areas of Hispanic concentrations to allow participation and dissemination of information about the City’s housing programs and availabilities. These facilities may include schools, churches

4. **Record Keeping**

The City will keep records of the following:

- The racial, ethnic and gender characteristics of home buyers, homeowners and applicants for a minimum of 5 years following project completion.
- Copies of advertisements and dates of each contact in conducting special outreach.

Participating housing organizations receiving federal housing funds through the Community Development Services Department will be contractually obligated to retain records of how available properties were marketed.

5. Assessment and Corrective Actions

Effectiveness of our affirmative marketing efforts will be addressed as follows:

a) To determine of good faith efforts have been made:

- Compare the information contained on the records to be kept, as determined by Procedure 4, with actions that were taken to carry out Procedures 2 to 3. If the required steps were taken, we will determine that good faith efforts have been made.

b) To determine results:

- The Community Development Services Department will annually examine and assess whether or not persons from the African American and Hispanic groups in the area applied for or became tenants or owners of units that were affirmatively marketed. If it is found that these groups are represented in numbers at or near the proportion of these groups in the local population, these procedures will be deemed effective. Should these groups be underrepresented, these procedures will be revisited to consider additional targeted outreach efforts. Should participating owners fail to meet these affirmative marketing requirements, the City may disqualify the owner from the City of Bryan housing programs. The City of Bryan will provide a written assessment of affirmative marketing efforts to be included in the annual performance report to HUD. This assessment will cover marketing relative to units constructed or rehabilitated and first made available for occupancy during that year.

Affirmative Marketing Techniques

Owners, builders and developers offering properties assisted by the City of Bryan Community Development Services Department are required to comply with the City's affirmative marketing requirement on all units sold or leased under the program. The Department of Housing and Urban Development has implemented guidelines and to assist in meeting affirmative marketing goals.

The following is a list of activities which must be carried out by assisted property owners, builders, developers, or agencies in order to insure compliance with federal regulations:

1. Correspond with various community organizations, employment agencies, churches, and groups in order to accomplish special outreach to those not likely to apply for housing in the available properties.
2. Utilize the fair housing logo on all printed advertisements and prominently in the business office.
3. Provide a fair housing brochure to prospective tenants or homebuyers in order to inform them of fair housing laws and the City's Affirmative Marketing Policy.

The following is a list of local agencies which will be notified in the event assisted units become available under the City's Housing Assistance Programs:

Affirmative Marketing Mailing List

Brazos Valley Affordable Housing Corporation
3971 E. 29th Street
Bryan, Texas 77802

Brazos Valley Council of Governments
3991 E. 29th Street
Bryan Texas 77802

Housing Authority of Bryan
517 Bryant
Bryan, Texas 77803

Twin City Mission, Inc.
PO Box 3490
Bryan, TX 77805

Brazos County Legal Aid
202 E. 27th Street
Bryan, Texas 77803

Brazos Valley Community Action Agency
1500 University Dr. East
College Station, Texas 77802
Habitat for Humanity
119 Lake
Bryan, Texas 77801

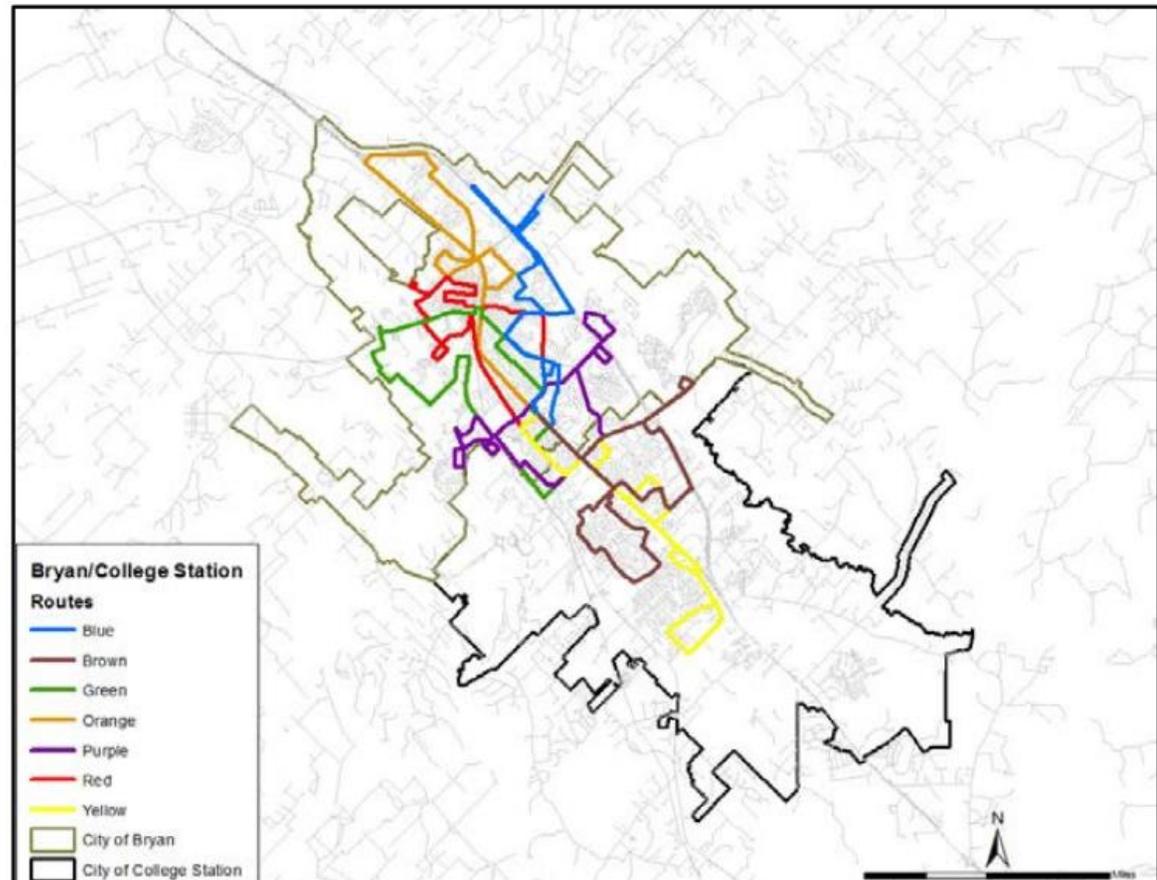
National Association for the Advancement of Colored People (NAACP)
Brazos County Branch
PO Box 665
Bryan, TX 77806

Local Union of Latin American Citizens (LULAC)
LULAC Council 4893 of College Station, TX
2404 Pintail Loop
College Station, TX 77845

Appendix – G Public Transit Route Maps
Brazos Transit District Bryan/College Station Bus Route Map

BRYAN/COLLEGE STATION FIXED ROUTE

BTD operates seven fixed route serving the Cities of Bryan and College Station, covering 68 route miles. The Bryan/College Station Fixed Route runs 17 vehicles for the fixed route and courthouse shuttle; 100 percent of the vehicles are ADA accessible with a wheelchair lift. Vehicles seat 24 with two wheelchair spaces.



Source: Bryan Transit District

<http://www.btd.org/BryanCollegeStation.htm>

Texas A&M University - Bryan Bus Route Map
Route 15: Old Army



Source: Texas A&M University Transportation Services <http://transport.tamu.edu/busroutes/>