

Draft



COMMUNITY DEVELOPMENT

2025–2029 Consolidated Plan and 2025–2026 Annual Action Plan

CDBG B-25-MC-48-0006 | HOME M-25-48-0229



1803 Greenfield Plaza, Bryan, TX 77802

Phone: (979) 209-5175 | Fax: (979) 209-5184 | bryantx.gov/community-development

Executive Summary for **2025–2029 Consolidated Plan and 2025–2026 Annual Action Plan**

CDBG B-25-MC-48-0006 | HOME M-25-48-0229



What is Community Development?

- Community Development receives and administers Community Development Block Grant (CDBG) and Home Investment Partnership Program (HOME) funds, as well as other funds from time to time, for the benefit of citizens of the City of Bryan to:
 - Facilitate the development and preservation of affordable housing
 - Promote neighborhood integrity
 - Partner in providing public services, facilities, and other assistance to primarily low to moderate income residents
 - Empower residents to leverage community resources available to them.

What is the Consolidated Plan?

- A comprehensive, five – year strategic document developed by the city to guide how federal funding is allocated for housing and community development efforts.
- Assesses community needs and identifies priorities based on those needs.
- Serves as both a planning tool and a formal application for funding from the US Department of Housing and Urban Development.

What is the Annual Action Plan?

- Provides funding for programs on an annual basis and is guided by the priority needs and goals set in the 5 Year Consolidated Plan.
- Also serves as a formal application to the US Department of Housing and Urban Development.

Consolidated Plan Executive Summary

- **Accomplishments from 2020-2024 (Does not include accomplishments from 2024 since the program year has not ended yet)**
 - 7 rehabilitation/reconstruction projects
 - 173 minor repair projects
 - 9 down payment assistance projects
 - 5 voluntary demolitions
 - 3,015 low to moderate income clients served through partnerships with Public Service Agencies
 - 2 rental housing units developed through CHDO Elder Aid
 - Covid relief
 - 14 businesses assisted and 69 jobs retained/employees benefited
 - 16 households assisted through Tenant Based Rental Assistance

Public Input

- **Surveys**
 - Service providers – distributed to nonprofits, private businesses, and public agencies
 - Community Needs Assessment – distributed to citizens of Bryan and advertised through a wide variety of media and resources
- **Focus Groups & Consultations**
 - Medical needs focus group
 - One on One consultations with agencies
- **Public Meetings and Hearings**
 - Informal town hall format meetings in the community
 - Formal hearings at Community Development Advisory Committee meetings

Key Findings

- **Community needs and priorities have been identified from the surveys, public meetings, and consultations.**
 - Safe and affordable housing
 - Job opportunities and skills training
 - Financial education
 - Financial literacy, credit repair, and debt management
 - Improved access to health and human services
 - Mental health care
 - Homelessness support for the unsheltered
 - Access to affordable child care
 - Transportation needs

5 Year Consolidated Plan Impact Focuses

- Reduce the number of substandard and dilapidated structures in the community.
- Help residents remain stably housed by addressing health and safety concerns.
- Preserve and extend the life of existing housing stock.
- Makes homeownership accessible for first-time buyers.
- Improve quality of life for underserved and vulnerable populations.
- Increase financial literacy and educational opportunities for residents.
- Strengthen access to essential services, including youth programs, health care, and supportive services.
- Expand economic opportunity for low to moderate income residents through small business support and job creation.
- Improve community safety, accessibility, and overall quality of life.



2025–2026 Annual Action Plan Summary

CDBG Projects

- **Homeowner Housing Assistance (\$562,748.00)**
 - Approximately 30 households are expected to be assisted by our minor repair grant program in Program Year (PY) 2025.
 - Approximately 2 households are expected to receive assistance through our voluntary demolition program.
 - Funding for this program also includes staff program delivery and costs necessary to carry out program activities.
- **Public Service Agency Funding (\$137,941.00)**
 - Addressing the needs of homelessness, youth and families, healthcare, and foster care.
 - Funding for this program also includes staff program delivery, which is the costs necessary to carry out program activities.
 - **Project Hope - BISD (\$25,000.00)**
 - Goal: Provide eligible expenses for a program designed to support students facing homelessness or in the foster care system. Estimated 500 clients.
 - **BCS Together (\$25,000)**
 - Goal: Provide support for caregivers of kids in the foster care system through financial assistance and the Closet which provides foster care families with essential items. Estimated 200 clients.
 - **Brazos Maternal Health and Child Health Clinic (\$40,000)**
 - Goal: Provide funds for prenatal program supplies, ultrasounds, lab tests, and patient education. Estimated 352 clients.
 - **Catholic Charities (\$40,000)**
 - Goal: Provide funding for the Brazos Valley Financial Stability Program which can include financial education and financial assistance to help eligible households avoid loss of utilities and/or housing. Estimated 300 clients.
- **Economic Development Assistance (\$75,000)**
 - A program to provide targeted funding to small businesses and microenterprises in Bryan to support local economic growth. The goal is to create and retain jobs, particularly for low to moderate income residents, while strengthening neighborhood business activity and long-term economic stability.
 - Approximately 2 businesses are expected to receive assistance in PY 2025.
- **Program Administration / Grant Compliance - CDBG (\$183,922.00)**
 - Program administration and grant compliance of CDBG programs.

HOME Projects

- **Homeowner Housing Assistance (\$258,883.34.00)**
 - Goal: Major rehabilitation/reconstruction of owner-occupied housing. Estimated 2 households assisted.
- **Acquisition/Homebuyer Assistance (\$72,000)**
 - Goal: Assist approximately 3 first time homebuyers with down payment assistance.
- **Community Housing Development Organizations (CHDO) (\$52,176.67)**
 - Production of affordable units, homebuyer or rental housing, by funds and technical support of the development of 1 CHDO project.
- **Program Administration / Grant Compliance - HOME (\$34,784.45)**
 - Program administration and grant compliance of HOME programs
- **HOME MATCH Requirements & Leveraging**
 - All Participating Jurisdictions must contribute or match no less than 25 cents for each dollar of HOME funds.
 - Estimated HOME leveraging of other resources in this Program Year is anticipated to be ~\$1 million.



CDBG B-25-MC-48-006
HOME M-25-MC-48-0229



CITY OF BRYAN
COMMUNITY DEVELOPMENT DEPARTMENT

Acknowledgements

BRYAN CITY COUNCIL

Bobby Gutierrez, Mayor
Paul Torres, Single Member District 1
Ray Arrington, Single Member District 2
Jared Salvato, Single Member District 3

James Edge, Single Member District 4
Marca Ewers-Shurtleff, Single Member District 5
Kevin Boriskie, At Large - Place 6

EXECUTIVE SERVICES STAFF

Kean Register, City Manager
Joey Dunn, Deputy City Manager

Hugh Walker, Deputy City Manager

COMMUNITY DEVELOPMENT STAFF, VOLUNTEER, AND STUDENT WORKER

Lindsey Guindi, Director
Bill Crowe
Charles Stilwell
Zyreshia Jackson
Lesley Villafuerte

Art Roach, Manager
Blanca Nava
Shannon Stricker
Gloria Weichert

COMMUNITY DEVELOPMENT ADVISORY COMMITTEE

Bob Bryns
Jaime Cavazos
Rissina Hall
Tonya Driver
Peter McIntyre
Christopher James Reyes

Robbye Elaine Taylor
Lindsay Hackett
Allison Broach Polka
Rebecca Marie Reyes
Carlos Santos-Rivera

SPECIAL THANKS

The Community Development Department expresses sincere appreciation to the numerous agencies, departments, committees, and individuals who participated in the development of the City of Bryan's 2025-29 Consolidated Plan and 2025 Annual Action Plan.

Approved by the Bryan City Council on: **Awaiting City Council approval**
Submitted to the U.S. Department of Housing and Urban Development on: **Not submitted yet**

Table of Contents

City of Bryan 2025-2029 Consolidated Plan & 2025 Annual Action Plan

Executive Summary

ES-05 Executive Summary	1
-------------------------------	---

The Process

PR-05 Lead & Responsible Agencies	8
PR-10 Consultation	9

Needs Assessment

NA-05 Overview	18
NA-10 Housing Needs Assessment	20
NA-15 Disproportionately Greater Need: Housing Problems	29
NA-20 Disproportionately Greater Need: Severe Housing Problems	32
NA-25 Disproportionately Greater Need: Housing Cost Problems	35
NA-30 Disproportionately Greater Need: Discussion	36
NA-40 Homeless Needs Assessment	42
NA-45 Non-Homeless Special Needs Assessment	45
NA-50 Non-Housing Community Development Needs	47

Market Analysis

MA-05 Overview	49
MA-10 Number of Housing Units	50
MA-15 Cost of Housing	53
MA-20 Condition of Housing	57
MA-25 Public and Assisted Housing	62
MA-30 Homeless Facilities	66
MA-35 Special Needs Facilities and Services	69
MA-40 Barriers to Affordable Housing	74
MA-45 Non-Housing Community Development Assets	75
MA-50 Needs and Market Analysis Discussion	83
MA-60 Broadband Needs of Low- and Moderate-Income Households	99
MA-65 Hazard Mitigation	100

Strategic Plan

SP-05 Overview	102
SP-10 Geographic Priorities	103
SP-25 Priority Needs	105
SP-30 Influence of Market Conditions	109
SP-35 Anticipated Resources	110
SP-40 Institutional Delivery Structure	113
SP-45 Goals Summary	118
SP-50 Public Housing Accessibility and Involvement	122
SP-55 Barriers to Affordable Housing	123

SP-60 Homelessness Strategy	124
SP-65 Lead based paint Hazards.....	126
SP-70 Anti-Poverty Strategy	128
SP-80 Monitoring.....	129

Annual Plan

AP-15 Expected Resources	130
AP-20 Annual Goals and Objectives	133
AP-35 Projects	136
AP-38 Project Summary	137
AP-50 Geographic Distribution	143
AP-55 Affordable Housing	145
AP-60 Public Housing	146
AP-65 Homeless and Other Special Needs Activities	147
AP-75 Barriers to Affordable Housing	149
AP-85 Other Actions.....	151
AP-90 Program Specific Requirement.....	154

Attachments / Appendices..... 156

Citizen Participation Plan
Affirmative Marketing Policy
Fair Housing Narrative Statement
Alternate Data Sources

Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Consolidated Plan (CP) for the City of Bryan, Texas, has been prepared in response to a required planning and application process developed by the U.S. Department of Housing and Urban Development (HUD) for the four entitlement grant programs. The Consolidated Plan allows the City to assess affordable housing and community development needs and market conditions, to make data-driven decisions. The Consolidated Plan provides a strategic plan for meeting priority needs that were identified through the consultation process. The analytical parts of the document draw from Census Data, the American Community Survey, and other data provided by HUD. Other data sources include surveys that was used to assist in prioritizing needs as well as public meetings, public hearings, and more. The City of Bryan's 2025-2029 Consolidated Plan serves as the planning document meeting the federal statutory requirements in 24 CFR 91.200-91.230 guiding the use of CDBG funding based on the priorities set forth in the Consolidated Plan.

The CP also includes the first Annual Action Plan (AAP), of the 5-year plan period. The Community Development Block Grant and HOME Grant provide Bryan with annual financial resources to achieve strategies developed in the planning process. The City of Bryan does not receive the HOPWA grant and must compete for ESG funds through the Texas Department of Housing and Community Affairs. The City became a Participating Jurisdiction with HUD in 1995, which allows the City to receive HOME funding on an annual basis. Currently, the City uses CDBG funds to help the homeless, and through working with local partners Project Unity and Twin City Mission who have been recipients of HOPWA and ESG.

The 2025-2029 5-Year Consolidated Plan is a coordinated approach to addressing Bryan's housing and community development needs. The goal of this collaborative planning process is to integrate economic, environmental, physical and human development needs in a comprehensive and coordinated manner so that families, neighborhoods, and community interests can work and continue to improve quality of life for all citizens in the City of Bryan. Ultimately, the Consolidated Plan allows the City of Bryan, its partners, providers, and citizens the opportunity to create a unified vision for the community.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The City identified objectives and outcomes detailed in the Strategic Plan (SP-25 and SP-45) and will address the following HUD objectives:

- Provide decent housing;
- Establish and maintain a suitable living environment, and;
- Provide expanded economic opportunities.

CDBG and HOME funded activities addressing HUD objectives will be assigned one of the following HUD outcomes:

- Availability/Accessibility
- Affordability
- Sustainability

Identified Priority Needs:

- **Housing:** Access to decent, safe, and affordable housing remains one of the most critical needs in Bryan. This priority encompasses a wide range of housing related activities aimed at supporting low- and moderate-income households and vulnerable populations. General objective for this would be providing decent housing and outcomes from housing activities include affordability and sustainability.

The next 5 years, Bryan will continue to fund programs that provide minor home repairs, rehabilitation, and reconstruction programs for low-to-moderate income homeowners, as well as programs that assist first time home buyers. The City will also continue to explore new opportunities to increase affordable housing in the City through community partnerships. As part of its comprehensive housing strategy, Bryan will also remain an active participant in the Brazos Valley Coalition for the Homeless and the Continuum of Care planning process, working collaboratively in an effort to expand homelessness services, shelter, and housing in our community.

- **Economic Development:** One of the key findings from community input and stakeholder engagement was the strong need for increased job opportunities and greater support for small businesses. Economic opportunity is critical to improving quality of life, reducing poverty, and promoting long term stability within the community. By strengthening the local economy, the City can help ensure that all residents have access to meaningful employment and pathways to financial independence. The objective of any economic development activities would be to expand economic opportunities and address the HUD outcomes of availability and accessibility as well as sustainability.

Over the next five years, the City of Bryan will promote economic stability and opportunity by supporting local businesses and job creation initiatives. The City plans to provide technical and financial assistance to small businesses and microenterprises, and other businesses, such as Section 3 businesses. By helping stabilize and grow local businesses, Bryan aims to strengthen mixed-use neighborhoods and foster economic self-sufficiency.

- **Public Services:** Access to health and human services remains a significant need in our community, especially vulnerable populations. Ensuring these services are both accessible and available plays an integral role in supporting resident's wellbeing and stability. Funding public service agencies aligns with the broader objective of creating a suitable living environment and contributes to the overall goal of enhancing quality of life for those most in need.

In the next five years, the City will continue to provide technical and financial assistance to eligible nonprofit service providers through a formal application process. Nonprofits may offer a range of

programs from health services, youth and family programs, job readiness training, financial assistance, and more.

- **Clearance and Demolition:** Substandard and dilapidated structures can pose safety risks and hinder community development efforts. A voluntary demolition program addresses these unsafe conditions. Funding for this activity supports HUD's objective of providing decent housing by creating opportunities for future redevelopment.

Over the next five years, City of Bryan will address slum and blight through our voluntary demolition program. By funding the voluntary demolition of abandoned or uninhabitable structures, the City aims to enhance public safety and create opportunities for future redevelopment.

- **Public Facilities:** The City will provide funding for projects that improve access to quality public facilities, including the rehabilitation of community centers, nonprofit facilities, and other eligible spaces that serve low-to-moderate income residents. These investments are critical to strengthening the infrastructure that supports effective service delivery and ensures accessibility for all community members.

Over the next 5 years, funding opportunities will be made available for eligible public facility projects through a formal application process.

- **Public Infrastructure:** Improving public infrastructure in low- to moderate- income neighborhoods is essential to ensuring health and safety, and overall quality of life for residents.

Over the next 5 years, the City will make program funding available to support infrastructure improvements as needs arise. Eligible projects may include upgrades to streets, sidewalks, and pedestrian pathways that enhance safety, accessibility, and mobility in underserved areas.

3. Evaluation of past performance

Following are the most recent accomplishments reported to HUD:

Administrative

- The City completed and submitted both the 2024–2025 Annual Action Plan and the 2023 Consolidated Annual Performance and Evaluation Report (CAPER). To ensure meaningful community participation, four public hearings were held across two separate advisory committee meetings. Additionally, the Community Development Advisory Committee (CDAC) convened public meetings about once a month to discuss ongoing projects, gather feedback, and guide decision-making.

Housing Programs

- Completed 1 major rehabilitation/reconstruction project to restore safe, quality housing for a low-to-moderate income homeowner.

- Provided housing assistance through the completion of 35 minor repair projects, addressing health and safety deficiencies and preserve the housing stock for low-income homeowners.
- Completed 2 voluntary demolition projects of dilapidated structures.
- Coordinated with and provided HOME Community Housing Development Organization (CHDO) set-aside funding and other available HOME funding for senior housing rental units in partnership with Elder-Aid, a city certified CHDO.

Code Enforcement

- Code enforcement efforts by the City (general funds) resulted in 5,804 code enforcement actions to eliminate slum and blight in the community.

Fair Housing

- The City's Community Development Department participated in 17 activities to promote Fair Housing and Equal Opportunities, to include public hearings, radio and television advertisements, and presentations to groups.

Public Services

These agencies were funded by the City of Bryan in the most recent reporting period and met the objective category of suitable living environment and outcome category of availability/accessibility.

- Unlimited Potential - served 22 clients
- Big Brothers, Big Sisters – served 33 clients
- Brazos Maternal and Child Health Clinic Women's Health Program – served 322 clients
- Family Promise Case Management - 123 clients served

Approximately \$514,045 of other federal, state/local, and private funds were leveraged in delivery of non-housing, public service agency program efforts.

Summary

Overall, the City mostly met or exceeded goals in the latest program year.

4. Summary of citizen participation process and consultation process

The Consolidated Plan (CP) is informed by a range of planning efforts and data sources to guide how the City of Bryan allocates federal funds for housing, human services, and community development. The consultation process demonstrates how HUD funds fit into a broader network of funding and services available in the city.

To develop the CP, AAP, and Analysis of Impediments to Fair Housing Choice, the City used an inclusive approach to gather public input. This outreach included focus groups, meetings, surveys, and online engagement opportunities such as:

- Service Provider Survey
- Community Needs Assessment
- Public Meetings and Hearings
- Medical Needs Focus Group
- One-on-One Consultations

The Service Provider Survey collected data on agencies, client needs, and service gaps. Outreach to health and human service providers was conducted through focus groups, surveys, and direct consultations. Information about these engagement opportunities was shared with approximately 80 agencies through emails to Community Partnership Board members, the Coalition for the Homeless, and the United Way 211 Newsletter.

The Community Needs Assessment was made available both online and through in-person public meetings and hearings, allowing Bryan residents to provide input on housing and community needs. To reach a broad audience, notices were shared through legal ads, radio and television segments, and other public notices in both English and Spanish. Additional outreach included neighborhood associations and local churches.

These efforts gathered feedback from a diverse group of stakeholders including nonprofit organizations, government agencies at all levels, the local school district, civic and religious organizations, the private sector, and local residents. A complete list of participating organizations is available in the “Organizations Consulted” table in the Attachments section.

Between October 2024 and June 2025 (on October 10, December 12, February 13, May 15, and June 5), the Community Development Advisory Committee (CDAC) hosted public forums to discuss the City’s community development programs and gather feedback on local housing and non-housing needs. During public hearings, staff presented information about eligible activities under the CDBG and HOME programs, as well as priorities and proposed funding for the CP and AAP. Presentations also covered topics such as Fair Housing, the Affirmative Marketing Plan, and the Analysis of Impediments.

All community comments were carefully reviewed and considered during the development of the Consolidated Plan’s goals, objectives, and performance outcomes for the next five years.

List of Consulted Service Providers and Private, Educational, and Government Organizations			
City of Bryan Mayor	Bryan City Council	Executive Office (City Manager)	Bryan & College Station Community Development
Planning & Development Services	Public Works Department	Fire Department	Police Department
Parks & Recreation Department	Building Standards Division	Flood Management Division	City of Bryan Emergency Management
Planning & Zoning Commission	AgriLife Extension Service	B/CS Habitat for Humanity	B/CS Homebuilders Association

BCS Together	Big Brothers, Big Sisters	Brazos County	Brazos County Emergency Management
Brazos County Health Department	Brazos County Public Defender's Office	Brazos Interfaith Immigration Network	Brazos Maternal and Child Health Clinic (Prenatal)
Brazos Transit System – The District	Brazos Valley Affordable Housing Corp.	Brazos Valley Cares	Brazos Valley Community Action Programs
Brazos Valley Economic Development Corporation	Brazos Valley Food Bank	Bridge Ministries	Bryan Housing Authority
Bryan Independent School District	Bryan Pregnancy Center	BV Center for Independent Living	BV Coalition for the Homeless
BV Council of Governments	BVCOGNet	BV Rehabilitation Center	BV Small Business Development Center
BV Workforce Development Coalition	BVCAP Energy / Housing Services	Catholic Charities of Central Texas	Chi St. Joseph Hospital
Empower Behavioral Health	Family Promise (Homeless Shelter)	Greater Brazos Partnerships	Healthpoint
Heart of Texas Goodwill	Junction 5-0-5	MHMR Authority of BV	National Alliance on Mental Illness
Peacock Legacy	Project Unity	Prosperity Bank	Salvation Army
Scotty's House Child Advocacy Center	Sexual Assault Resource Center	Summit Pediatrics	Sweet Oak Collaborative
Texas A&M University College of Nursing	Texas A&M University Off Campus Housing	Texas A&M University Real Estate Research Center	Texas A&M University System
Texas Commission on Environmental Quality	Texas Department of Family and Protective Services	Texas Dept. of Housing and Community Development	Texas Workforce Solutions
The Reach Project	Twin City Mission	Unbound Now	United Way of the Brazos Valley
Voices for Children (CASA)	Workforce Board		

5. Summary of public comments

To be completed after public hearing and public comment period.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments will be accepted and used in development of the CP and AAP, particularly regarding program priorities and funding allocations. Only comments outside the scope of the City of CDBG and HOME grant policies were not used in determining priorities.

7. Summary

To be completed after public hearing and public comment period.

DRAFT

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	BRYAN	Community Development Department
HOME Administrator	BRYAN	Community Development Department

Table 1 – Responsible Agencies

Narrative

The City of Bryan is a Home Rule City with a Council/Manager form of government. The lead entity responsible for overseeing the development and process of the Consolidated Plan (CP), annual action plans, the CAPER, and the AI is the City of Bryan Community Development Department. The Director of Community Development reports to the Deputy City Manager. The Deputy City Manager reports directly to the City Manager. The City Manager, or his appointed designee, through Resolution is designated by the City Council as the City's Certifying Officer for Community Development activities. As needed, the CD office coordinates with other various city departments in the process of administering grant funded activities.

Consolidated Plan Public Contact Information

Visit the Community Development Department website for access to reports, documents in public comment periods for archive purposes, and for new and information pertinent to administration of the federal block grants. See <https://www.bryantx.gov/community-development/>

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The City of Bryan Community Development Department used an inclusive approach to gather input for the development of the Consolidated Plan (CP), Annual Action Plan (AAP), and Analysis of Impediments (AI).

Outreach involved local, regional, state, and federal agencies, along with housing, health, and human service providers, elected officials, nonprofit organizations, and community stakeholders. Opportunities for input included online and in-person surveys, public meetings and hearings, workshops, and one-on-one consultations.

Participants provided feedback on priority needs, goals, objectives, and funding allocations for housing and community development programs.

In accordance with HUD requirements, the City also consulted:

- Broadband providers and organizations focused on narrowing the digital divide for low- to moderate-income populations.
- Agencies responsible for flood-prone areas, public land, water resources, and emergency management.

These efforts ensured the planning process was comprehensive, collaborative, and aligned with HUD's guidance.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The City of Bryan Community Development Department actively collaborates with a wide network of public and assisted housing providers, as well as health and human service providers in the planning and implementation of its CP plan process. In this planning cycle, the City consulted local, regional, and state entities involved in housing and supportive services (see: Summary of Citizen Participation Process and Consultation Process). Public outreach efforts included online surveys to gather input on needs and priorities for future HUD funded activities.

The Community Development Department also participates in multiple collaborative networks and coalitions that aim to improve service delivery and reduce duplication, including the Brazos Valley Coalition for the Homeless, where staff serve as active members. The Department also maintains coordination with the local public housing authority through regular reviews of budgets, construction efforts, and certification of consistency aligned with the City's annual and 5-year goals.

Also, the Bryan City Council delegates to the Community Development Advisory Committee (CDAC), the responsibility to review, advise, and recommend funding allocations and program details to Council and staff. The CDAC is an advisory committee comprised of seven council appointees that hold regular

public meetings and required public hearings for federally funded activities. The City of Bryan also partners with the City of College Station to identify shared community needs and enhance regional efforts to improve quality of life.

Finally, city staff remain available to provide technical assistance and support to affordable housing initiatives, when appropriate, including CHDO development projects, Habitat for Humanity programs. Reinforcing the City's commitment to coordinated housing and service strategies.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

Over the past two decades, the City of Bryan, through its Community Development Department, has worked collaboratively with several local agencies to more effectively identify and address the needs of individuals and families experiencing homelessness. The City's Community Development Block Grant (CDBG) funds are made available annually through a competitive application process to support local health and human service programs, including those that specifically target homelessness.

In addition to CDBG funding, the City actively coordinates with key service providers such as Twin City Mission, Project Unity, and Family Promise in support of their applications for federal assistance through programs like the Continuum of Care (CoC) grant, Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). These partnerships enhance the City's ability to meet the complex and evolving needs of people facing homelessness.

Bryan is also an active member of the Brazos Valley Coalition for the Homeless (BVCH), a regional body that fosters collaboration among public and private partners. Through this partnership, the City participates in coordinated outreach efforts aimed at connecting unsheltered individuals with services while reducing unnecessary interactions with law enforcement. City departments are equipped with contact information for outreach professionals who can directly assist individuals experiencing homelessness, helping to divert them from the criminal justice system and toward support services.

As part of its ongoing collaboration with BVCH, the City also supports the annual Point-in-Time (PIT) count, a HUD-mandated effort to estimate the number of individuals experiencing homelessness on a single night. The most recent PIT count was conducted on January 23, 2025, and identified 44 unsheltered and 72 sheltered individuals in Bryan.

Service providers have reported that the most underserved populations include low-income individuals, those with mental health conditions or cognitive disabilities, and people experiencing homelessness. Key needs identified include access to affordable housing, reliable transportation, mental health care, and substance abuse treatment. These challenges are closely tied to the risk factors for homelessness, and addressing them requires a comprehensive, coordinated response. One of the key barriers identified is the limited capacity to screen unsheltered individuals for mental health or substance use issues. Additionally, many shelters lack the resources to provide clinical mental health or addiction counseling. In response, the City of Bryan and BVCH have developed a coordinated outreach strategy designed to better connect individuals to services, improve care continuity, and reduce gaps in the support network for the homeless population.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The City of Bryan actively consults with the Brazos Valley Coalition for the Homeless, the local Continuum of Care (CoC), in determining priorities for ESG funding and in the development of strategies related to homelessness prevention and housing stability. City staff participate in CoC meetings and planning sessions to coordinate on funding decisions, ensure alignment with CoC goals, and avoid duplication of services across agencies.

Through this collaboration, the City works with CoC partners to:

- Allocate ESG Funds: CoC input is integral in identifying service gaps and directing ESG resources to the most effective emergency shelter, homelessness prevention, and rapid re-housing activities. Funding decisions reflect shared priorities developed in consultation with CoC member organizations, including service providers, housing agencies, and advocacy groups.
- Develop Performance Standards and Evaluate Outcomes: The City and CoC collaborate to establish performance benchmarks for ESG-funded programs. These include goals related to housing stability, length of homelessness episodes, and placement in permanent housing. Program outcomes are regularly reviewed by the CoC and City staff to inform future funding decisions and improve service delivery.
- Administer and Expand HMIS: The City supports CoC-led efforts to manage and expand the HMIS. This includes participating in the development of policies and procedures for data quality, privacy, and reporting. ESG subrecipients are required to enter data into HMIS in accordance with CoC standards. The City helps ensure compliance with HUD requirements, including CoC, SuperNOFA, and AHAR submissions.

Additionally, the City supports the CoC's efforts to maintain HEARTH Act compliance, participate in the annual Point-in-Time Count, and evaluate policies and procedures governing the overall CoC system. These collaborative efforts ensure a coordinated, data-driven approach to addressing homelessness in Bryan and the surrounding region.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
Brazos Valley Council of Governments	Housing Services Housing Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Services-Education Services-Employment Service-Fair Housing Regional Organization Planning Organization Civic Leaders	Housing Need Assessment Non- Homeless Special Needs HOPWA Strategy Economic Development Market Analysis Anti- Poverty Strategy Non-housing needs	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.
Bryan	Housing PHA Services Housing Service-Fair Housing Other government Local Planning organization Civic Leaders	Housing Need Assessment Public Housing Needs Economic Development Anti- Poverty Strategy Non- housing needs, public facility / infrastructure needs	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.
Bryan Housing Authority	Housing PHA Services Housing Services-Children Services-Elderly Persons Service-Fair Housing	Housing Need Assessment Public Housing Needs Market Analysis Anti-Poverty Strategy Non-housing needs	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.
Bryan/College Station Metropolitan Planning Organization	Regional organization Planning organization Civic Leaders Multi-entity transportation planning organization	Transportation needs	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.
Brazos County Health District	Services-Persons with HIV/AIDS Services-Health Health Agency Other government - County	Lead-based Paint Strategy Other non- housing needs	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.
The Brazos Transit District	Services-Elderly Persons Services-Persons with Disabilities Regional organization Public Transportation organization	Non-housing needs, specifically transportation	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.

Project Unity (PU)	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Health Services-Education Services - Victims Info and referral on Services, HOPWA, etc.	Housing Need Assessment Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy Non-housing needs	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.
Bryan-College Station Habitat for Humanity	Housing Services Housing Service-Fair Housing Faith Based Organization	Housing Need Assessment Market Analysis Anti-Poverty Strategy Financial Literacy	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.
Brazos Valley Coalition for the Homeless	Services-homeless Regional organization Planning organization	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth HOPWA Strategy	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.
BCS Chamber of Commerce	Services-Employment Regional organization Business Leaders Civic Leaders Business and Civic Leaders	Economic Development	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.
Brazos Valley Community Action Programs	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Services-Education Service-Fair Housing Health Agency Regional organization	Housing Need Assessment Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.
Brazos County	Services-Health Health Agency - Emergency Management Publicly Funded Institution/System of Care Other government - County Planning organization Civic Leaders Veteran Services	Economic Development Non-housing needs to include infrastructure and transportation	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.

Brazos Valley Council of Governments	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Services-Education Service-Fair Housing Health Agency Regional organization	Housing Need Assessment Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy Economic Development Needs - Veterans Homelessness Financial Literacy Other non-housing needs	Personal consultation (in person and/or phone) and/or sent correspondence notifying of opportunities to provide input and comment via surveys, hearings, workshops, etc.
--------------------------------------	---	---	--

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

All agency types were included in consultation during development of the Bryan CP and AAP. Specific agencies and organizations not consulted with in either workshop or one-on-one meetings, were invited to provide input and comment by participation in online survey opportunities and/or by correspondence.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	BV Coalition for the Homeless (BV CoC / Twin City Mission)	The Strategic Plan includes goals developed to address needs identified by both the City and Homeless Coalition.
Comprehensive Economic Development Strategy	Brazos Valley Council of Governments (BVCOG)	As a BVCOG member, the Bryan goals for meeting: affordable housing; transportation; economic, healthcare, and infrastructure needs reflect similar priorities in the BVCOG CEDS plan.
PHA 5-Year Plan	Bryan Housing Authority (BHA)	Goals identified by BHA mirror goals in the BHA Strategic Plan, namely: affordable rental housing; renovation of housing; and energy efficiency.
Texas Low Income Housing Plan and Report	Texas Dept. of Housing and Urban Development (TDHCA)	The Strategic Plan supports TDHCA affordable housing goals to include home-buyer assistance, housing repair, affordable housing development, fair-housing, and other local housing needs.
Comprehensive Plan	City of Bryan	Strategic Plan goals reflect similar priorities outlined in the Bryan Comprehensive Plan, to include: affordable housing; housing rehabilitation; code enforcement; and infrastructure.
Brazos Valley Health Status Assessment	Center of Community Health Development	Priority needs identified in the Strategic Plan are also recognized by the Regional Health Assessment, including: affordable housing, homelessness shelter services, health services, job training, affordable childcare, etc.
Brazos Valley Coordinated Transportation Update	Brazos Valley Council of Governments	Goals identified by the survey confirm needs in the Strategic Plan, namely a need for improved public transportation services for the low and moderate-income citizens.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

The City of Bryan works closely with various public entities at the local, regional, and state levels to support the successful implementation of its Consolidated Plan (CP).

The City maintains a strong working relationship with the City of College Station, collaborating on shared housing and community development goals, coordinating outreach efforts, and aligning strategies to address regional needs. This partnership helps ensure consistency in service delivery and maximizes the impact of HUD resources across both jurisdictions.

At the state level, the City coordinates with the Texas Department of Housing and Community Affairs (TDHCA) and the Texas Health and Human Services Commission, especially in reviewing Housing Tax Credit applications and other housing initiatives to ensure alignment with local priorities outlined in the CP.

The City is an active member of the Brazos Valley Coalition for the Homeless and collaborates with the Brazos Valley Council of Governments (BVCOG) to support regional planning efforts, homelessness services, and affordable housing strategies.

Additionally, the City consults regularly with the local public housing authority, reviewing budgets, planned improvements, and providing Certifications of Consistency with Bryan's housing and community development goals.

This coordinated approach ensures that Bryan's use of federal funds is strategic, efficient, and aligned with broader regional and state efforts to serve low- to moderate-income residents.

Narrative (optional):

To ensure a comprehensive analysis of local needs as well as effective program goals and objectives meeting needs, the City involved all types of health and human service providers, government agencies, and private sector service entities the Consolidated Planning process. Individual consultations, agency workshops, online surveys and, mail-outs, public hearings and review of other available resources allowed the City to prepare strategies that serve both stakeholders and clients. The City of Bryan enjoys good working relations with local providers and fosters those associations by regularly scheduled forums and workshops. These regular meetings ensure goals are being carried out, grant program requirements are being satisfied, and needs are being met according to the Consolidated Plan and Annual Action Plan.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

To be completed at the end of the public comment period.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing					
2	Public Comment Period					
3	Survey					

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The City of Bryan's Needs Assessment was developed through a combination of data analysis and community engagement to identify and prioritize the city's housing and non-housing needs. HUD default data for this section are from the 2000 Census (Base Year); 2016-2020 ACS; and the 2016-2020 CHAS data. Where available, data is updated or supplanted with the 2019 -2023 ACS and CHAS data. All data encompasses the City of Bryan, with some references to the broader Bryan-College Station Area.

Analysis of the data indicates that cost burden, defined as spending more than 30 percent of household income on housing, is the most prevalent housing issue in Bryan. Both renters and homeowners are affected, with the incidence of cost burden exceeding the Texas state average. Low-income elderly households and families with children are particularly vulnerable, often facing cost burden in combination with other challenges such as substandard housing or overcrowding. CHAS/ACS data further shows that multiple, unrelated family households are increasingly common in both renter (105) and owner (180) categories, suggesting some level of housing crowding or shared housing arrangements. This may indicate affordability challenges or a lack of appropriately sized units for extended or non-traditional households. When discussing the disproportionately burdened, the data suggests that 1,475 out of 5,155 (approx. 29%) of Black households pay more than 50% of income toward housing. In contrast, about 20% of White households are in this category.

To help meet affordable housing needs, the Bryan Housing Authority manages 300 units, which are rated by BHA as in good overall condition. Many of these units have been renovated to improve energy efficiency, enhance safety, and provide more modern living conditions. BHA reports adequate accessible units with all of them currently being occupied. Additional rental housing is provided by the Brazos Valley Council of Governments (BVCOG) Housing Choice Voucher Program which makes approximately 1,643 vouchers available. Approximately, 65% of those vouchers are used in Bryan to assist citizens with payment of rent on privately owned residential units. There is a waiting list for the voucher program and BVCOG estimates a multiyear waiting period for those who do not qualify for a priority preference.

Regarding homelessness, numbers from the January 2025 Point-in-Time Count show there were 44 unsheltered individuals and 72 sheltered individuals across 56 households. Sheltered locations included Family Promise, Phoebe's Home, and the Doug Weedon Shelter for Hope. The majority of those experiencing homelessness were adults, with 15 children also reported. Common contributing factors include substance use, mental health issues, and the lack of living wage employment

Input collected on non-housing issues indicates a continued need for all current city programs, particularly making public service agency funding available to local providers. Agencies reported housing, transportation, job training and employment, and mental health and health care as some of the most pressing needs. Several of these also tend to be indicative of a risk of homelessness. Other top

priority needs, as reported by clients and agencies, were affordable housing, health services, job creation and training, enhanced public transportation options, infrastructure / public facility improvements, and code enforcement.

DRAFT

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The most prominent housing problem from the housing needs assessment are housing cost burdens, which impact groups most in need of housing assistance from income levels from 0% to 80% of the Area Median Income (AMI). According to 2025 data from the National Low Income Housing Coalition (NLIHC), 87% of individuals facing cost burdens are classified as extremely low income. Small and large related homes and the elderly were most affected by cost burdens more than 30% of income. Cost burdens over 50% of income affected the elderly.

Single-person households, particularly those led by elderly individuals, face higher rates of housing cost burdens and often experience issues related to poor housing conditions and limited accessibility. Of those in the Housing Choice Voucher Program, 27% are households with an elderly head of household or spouse, highlighting a significant need.

Data from the Comprehensive Housing Affordability Strategy (CHAS) and the American Community Survey (ACS) further highlight the housing needs of vulnerable populations, including people with disabilities and survivors of dating violence and sexual assault. Among the 1,728 families impacted by the BVCOG grant, 56% include a person with a disability. Twin City Mission, a nonprofit organization serving domestic violence survivors, reports that 42 of its clients currently need housing assistance—comprising 16 adults and 26 children across 15 households. These households are predominantly Black and White, and face challenges such as lack of income, single parenthood, and limited self-sufficiency skills.

Similarly, a survey conducted by Bryan's Sexual Assault Resource Center (SARC) identified housing assistance as a primary need from clients. Additional barriers for victims of sexual assault were transportation and limited awareness of services.

Community feedback from Bryan's Consolidated Plan input meetings in February emphasized the need for affordable housing, job training, and employment opportunities. Specific concerns were raised about the lack of emergency homeless shelters, particularly for low-income families with children. Reports and data show that low-income families with children facing housing cost burdens between 30% and 50% of their income, as well as formerly incarcerated individuals, are at heightened risk of homelessness. Reports and data from the National Low Income Housing Coalition (NLIHC) and the Texas Criminal Justice Coalition demonstrate the connection between incarceration and increased risk of homelessness.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	79,410	85,645	8%
Households	28,930	30,650	6%
Median Income	\$40,312.00	\$46,813.00	16%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	5,895	4,400	5,715	3,680	10,960
Small Family Households	1,775	1,560	2,280	1,370	4,955
Large Family Households	755	510	530	505	1,070
Household contains at least one person 62-74 years of age	855	535	970	570	2,220
Household contains at least one person age 75 or older	485	455	610	230	945
Households with one or more children 6 years old or younger	984	1,050	1,120	814	1,155

Table 6 - Total Households Table

Data 2016-2020 CHAS
Source:

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	145	50	15	25	235	70	140	10	0	220
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	280	75	0	45	400	0	25	45	10	80
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	120	60	120	60	360	0	210	35	99	344
Housing cost burden greater than 50% of income (and none of the above problems)	2,940	795	185	0	3,920	765	295	195	20	1,275
Housing cost burden greater than 30% of income (and none of the above problems)	440	1,450	1,235	280	3,405	140	405	580	315	1,440

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Zero/negative Income (and none of the above problems)	495	0	0	0	495	110	0	0	0	110

Table 7 – Housing Problems Table

Data 2016-2020 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	3,485	985	315	130	4,915	835	675	285	129	1,924
Having none of four housing problems	1,175	1,660	2,835	1,690	7,360	395	1,075	2,275	1,730	5,475
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 8 – Housing Problems 2

Data 2016-2020 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,230	860	440	2,530	310	355	295	960
Large Related	580	85	4	669	115	165	115	395
Elderly	825	285	170	1,280	295	225	260	780
Other	1,150	1,160	830	3,140	255	195	105	555

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Total need by income	3,785	2,390	1,444	7,619	975	940	775	2,690

Table 9 – Cost Burden > 30%

Data 2016-2020 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	225	225	275	125	0	400
Large Related	0	0	0	0	115	115	0	230
Elderly	670	150	40	860	205	45	160	410
Other	0	1,100	480	1,580	240	0	0	240
Total need by income	670	1,250	745	2,665	835	285	160	1,280

Table 10 – Cost Burden > 50%

Data 2016-2020 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	330	95	30	130	585	0	120	80	49	249
Multiple, unrelated family households	15	0	90	0	105	0	120	0	60	180
Other, non-family households	55	40	0	0	95	0	0	0	0	0
Total need by income	400	135	120	130	785	0	240	80	109	429

Table 11 – Crowding Information – 1/2

Data 2016-2020 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

Census Reporter statistics from 2023 ACS data states that out of the 33,775 households that are in the Bryan-College Station area, 7,092 (21%) are single person households in Bryan, TX. This number does factor in the amount of single people as those who are attending Texas A&M University or Blinn College. From this number, and from the listed CHAS and ACS data, those in single person households in need of housing assistance are the elderly. The CHAS/ACS data reveal that elderly experience cost burden, housing condition problems, and accessibility issues at higher rates, followed by all racial groups in the lowest income levels 0% to 50% of Area Median Income (AMI). Additionally, individuals with disabilities are significantly represented among those in need, often facing similar or compounded barriers to stable housing. Data from the Brazos Valley Council of Governments (BVCOG) show that individuals with disabilities make up 56% of the 1,728 families impacted by the BVCOG grant, underscoring the high demand for housing assistance within this population. The Brazos Valley Council of Governments (BVCOG) Housing Choice Voucher Program currently serves a significant portion of this population, with 27% of its assistance going to households led by an elderly head or spouse.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

There is no definitive, correlated number on the number of households in need of housing assistance who are victims of domestic violence, dating violence, sexual assault, or stalking. However, these groups are impacted by housing problems, and in need of housing assistance. Those with a disability make up a majority of the families impacted by the BVCOG grant, making up 56% of the 1728 families impacted, showing their need for housing assistance for those who are disabled. Bryan non-profit Twin City Mission's 2024 information from their programs and shelters for domestic violence victims' states that out of their 42 clients for, 16 of them were adults, 26 children, and 15 were in households. These 15 households had a female head of household, and victim demographics were predominately Black (25) and White (17). There were also 6 victims who were Hispanic.

The Sexual Assault Resource Center (SARC) estimates that they serve more than 1,000 residents. It is unclear how many of this number are in need of housing assistance, but the primary need given in the survey from its clients was for safe and affordable housing. filed experiencing housing concerns. Those included in the SARC can also experience domestic violence, which show the need in both categories.

What are the most common housing problems?

The most common housing problem in the City of Bryan is housing cost burden, particularly among renter households with extremely low incomes (0 to 30 percent of Area Median Income or AMI). Data shows that 3,920 renter households are paying more than 50 percent of their income on housing, indicating a severe cost burden. Of these, 2,940 households fall within the 0 to 30 percent AMI range, highlighting the disproportionate impact on the city's most economically vulnerable residents. Owner occupied households also face cost burdens, with 1,275 homeowners spending more than 50 percent of their income on housing costs. A majority of these, 765 households, are also in the lowest income category.

When broader cost burdens are considered, specifically households paying more than 30 percent of their income on housing, 3,405 renters and 1,440 owners are affected. This data illustrates that cost burden is not limited to extremely low-income households but also significantly impacts those earning up to 80 percent of the AMI, particularly in the rental market.

In addition to affordability issues, overcrowding and substandard housing are also significant concerns. Severe overcrowding, defined as more than 1.5 persons per room, impacts 400 renter households and 80 owner households. Moderate overcrowding, between 1.01 and 1.5 persons per room, affects 360 renters and 344 owners. Substandard housing conditions, such as units lacking complete kitchen or plumbing facilities, are experienced by 235 renter households and 220 owner households. Additionally, 495 renter households and 110 owner households report having zero or negative income, placing them at extremely high risk of housing instability and homelessness. A recent survey of approximately 25,000 residential properties by the City using appraisal district data to consider age, quality of construction, lack of maintenance, and observed deterioration, suggested as many as 885 single-family owner-occupied units and 503 renter occupied units would likely be defined as substandard – units in urgent need of repair and/or rehabilitation.

Stakeholder feedback and community engagement sessions further emphasized the complexity of these issues. Residents and service providers highlighted that individuals and families impacted by domestic violence often face additional barriers, such as limited income, single parent households with multiple children, and a lack of self-sufficiency skills. Survivors of sexual assault, according to the Sexual Assault Resource Center, frequently report challenges with securing housing, transportation, and accessing supportive services. These needs were echoed in public input meetings held on February 18 and 20, 2025, where residents consistently identified affordable housing, job training, and redevelopment opportunities as critical needs.

Are any populations/household types more affected than others by these problems?

Analysis of CHAS and ACS data indicates households most affected by the housing cost burden being 30% greater were other forms of households aside from small and large related and the elderly. Out of the listed households, small related households were more affected by the cost burden over 30%. For cost burdens over 50% of income, the households most affected aside from other households are the elderly. Overcrowding, particularly severe overcrowding, was found to impact single family households the most. These conditions often present in lower income neighborhoods and are commonly linked to limited availability of appropriately sized and affordable housing units.

Among victims of domestic violence, the most affected demographic is single parent households. According to the data, 585 single parent households were identified as experiencing housing cost burdens. Other vulnerable populations include women fleeing domestic violence and individuals facing mental health challenges or substance use disorders. These groups often struggle to access stable housing without supportive services and face additional barriers such as limited income, lack of safe shelter options, and insufficient availability of rental assistance or housing vouchers.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Those who are of these groups are low-income individuals and families with children that are experience cost burdens, making less income than the cost burden of living, either 30% or 50% below their incomes. Consolidated plan meeting inputs show that the needs of these groups are an increase in creating emergency homeless shelters in the case of becoming unsheltered, as well as the implementation and building of affordable housing.

The SARC also provides services to address the needs of those who are homeless, providing social services and referrals to other housing programs. A large portion of their needs lie in transportation and housing and job skill training. SARC also has stated they have had to turn away residents due to capacity limitations, showing the urgency to address these issues as there are assistances that are limited in health and social services.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

No estimates provided.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Those who experience cost burdens in their households, and the elderly are characteristics that have an increased risk of homelessness. As both are affected by increased cost burdens and accessibility issues for shelter. Consolidated input meetings highlighted the need for increased elderly housing locations.

The formerly incarcerated, and convicted people are another population that are more affected by cost burdens. The National Low Income Housing Coalition (NLIHC) article “Barriers to Housing for Formerly Incarcerated and Convicted People” states that as those incarcerated go back to their communities, there is a barrier to acquiring housing after being released due to lack of job training and cost burdens. The Texas Criminal Justice Coalition 2019 report “Return to Nowhere” examines and correlates becoming involved with the criminal justice system and homelessness in Travis County.

Discussion

Concluded findings of the following needs assessment report of CHAS and ACS data is that out of the many problems to housing, the most common among households is cost burden, affecting households whose cost burden is within 30-50% of their income. City community input findings from community development meetings and SARC surveys suggest the importance of the continued need for housing assistance and programs that are developed by CDBG and HOME allocations. The City of Bryan will continue to utilize its CDBG and HOME allocations to address housing needs locally. Other resources, public and private, will be used to leverage program efforts in providing housing needs for renters, owners, buyers, the homeless, and non-homeless special needs.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The City of Bryan analyzed CHAS data from the U.S. Census Bureau to identify any instances of Disproportionately Greater Need, as defined by HUD, among racial, ethnic, and income groups. This analysis focused on the four standard housing problems: lack of complete kitchen or plumbing facilities, housing cost burden greater than 30% of income, and overcrowding (defined as more than one person per room).

The following tables present housing problem data by income categories, 0–30%, 30–50%, and 50–80% of Area Median Income (AMI) to help provide insight into how housing problems affect different income levels and helping to identify patterns of disproportionate need across these groups.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,895	995	0
White	1,960	400	0
Black / African American	1,400	335	0
Asian	25	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,260	230	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,515	885	0
White	1,310	330	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	685	155	0
Asian	94	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,325	385	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,420	3,285	0
White	1,130	775	0
Black / African American	400	570	0
Asian	65	120	0
American Indian, Alaska Native	0	0	0
Pacific Islander	4	0	0
Hispanic	825	1,695	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	850	2,820	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	520	1,125	0
Black / African American	30	483	0
Asian	25	29	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	259	1,160	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

An analysis of housing problems by income levels in Bryan reveals that households earning less than 80% of the AMI face significant and disproportionate housing challenges. Across the lowest income group (0 to 30% AMI), approximately 80% of households experience one or more of the four HUD-defined housing problems, which include cost burden, overcrowding, and inadequate kitchen or plumbing facilities. This high level of need is consistent among Black or African American and Hispanic households, who represent a large share of affected households in this income category.

For households earning between 30%-50% AMI, roughly 80% continue to face housing difficulties, with minority groups, particularly Hispanic and Black or African American households, disproportionately impacted. Asian households in this group also report a high incidence of housing problems. While the prevalence of housing problems begins to decline for those earning between 50% - 80% percent AMI, about 42% still experience challenges, with White, Hispanic, and Black or African American populations affected.

Overall, the data highlights persistent disparities in housing stability and affordability among minority populations and lower-income households throughout Bryan. These findings emphasize the importance of targeted housing programs and policies designed to address affordability, improve housing quality, and reduce overcrowding, with a focus on vulnerable populations disproportionately impacted by housing problems.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Review of 2016-20 CHAS data from the U.S. Census Bureau allowed the City of Bryan to explore possible occurrences of Disproportionately Greater Need (as defined by HUD) related to severe housing problems for the various racial, ethnic and income groups. Housing problems include incomplete kitchen or plumbing facilities, cost burden greater than 50%, and overcrowding (more than one person per room). The following tables show data on severe housing problems for income groups of 0-30%, 30-50%, 50-80%, and 80-100% of the area median income, thereby allowing an examination of the likelihood of Disproportionately Greater Need by multiple income categories.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,320	1,570	0
White	1,690	680	0
Black / African American	1,265	465	0
Asian	25	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,115	370	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,660	2,735	0
White	570	1,070	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	255	590	0
Asian	54	40	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	745	960	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	600	5,110	0
White	270	1,635	0
Black / African American	90	880	0
Asian	45	140	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	4	0
Hispanic	195	2,320	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	259	3,420	0
White	94	1,560	0
Black / African American	0	513	0
Asian	25	29	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	140	1,280	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Analysis of severe housing problems in Bryan reveals a clear correlation between income level and housing instability. The most vulnerable households, particularly those earning less than 30% of AMI, experience the highest rates of severe housing issues. Over 4,300 households in this extremely low-income category face challenges such as unaffordable housing costs, overcrowding, or inadequate facilities. These problems diminish as income increases but remain present among moderate-income groups.

Significant disparities also exist among racial and ethnic groups. Black or African American and Hispanic households are disproportionately affected by severe housing problems, especially at lower income levels. For example, in the 0% -30% percent AMI bracket, both groups have thousands of households experiencing severe housing difficulties. White households also face notable challenges, though generally at lower rates compared to minority populations. Asian households show smaller numbers but still experience severe housing issues across income levels.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205

(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Analysis of 2016-20 CHAS data from the U.S. Census Bureau allowed the City of Bryan explored possible occurrences of Disproportionately Greater Need (as defined by HUD) related to two categories: cost burden greater than 30 - 50% of income needed for housing expense; and over 50% of income required for housing costs. The following tables show data for race and ethnicity, thereby allowing an examination of the likelihood of Disproportionally Greater Need by multiple racial and ethnic categories.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	18,555	5,710	5,680	710
White	9,045	2,580	2,515	360
Black / African American	2,475	1,015	1,475	190
Asian	280	60	104	20
American Indian, Alaska Native	0	0	0	0
Pacific Islander	30	4	0	0
Hispanic	6,470	1,865	1,370	130

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS

Discussion:

The housing cost burden data indicates that while a majority of households in Bryan maintain affordable housing costs relative to their income, a substantial portion faces financial stress related to housing expenses. Racial and ethnic disparities in housing cost burden are evident. Black or African American and Hispanic households disproportionately face moderate and severe burdens compared to White households. The number of households with no or negative income, while smaller, is critical to note, as these households are particularly vulnerable to homelessness and housing insecurity.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Review of CHAS/ACS data indicates that all forms of housing problems in Bryan occur at higher percentages for lower-income households than other housing problems in general. Data also reflects disproportionately greater need where severe cost burden and other housing problems affect Black / African Americans and Hispanics at higher proportion of the population, than white households, particularly in the 0-30% and 30-50% AMI income categories.

If they have needs not identified above, what are those needs?

In terms of an adequate supply of affordable housing units, data shows sufficient numbers of housing units for households up to 100% of AMI, but this is not an indication of the condition of affordable housing. The data reviewed indicated that a substantial number of rental units have at least one of the four housing problems, and of owner-occupied units also exhibit a relatively high number of units with condition issues. This review also found that affordable homes for sale to those in the 30-50% AMI income categories is lacking. While the condition and quality of the housing stock represent a pressing need, housing cost burden remains a significant concern for many residents, affecting their ability to maintain stable and sustainable housing. Together, these challenges highlight the need for comprehensive strategies that address both housing affordability and quality.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Reviewing U.S. Census data, the City identified census tracts with 50% or more of any one race or ethnic minority group. For the purposes of this document, an "Area of Racial/Ethnic Minority Concentration" is a U.S. Census Tract with a total population that consists of more than 50% racial or ethnic minority residents. In Bryan, concentrations of racial and ethnic minority citizens are predominately located in the older central and northern neighborhoods. The census tracts containing 50% or more, racial and ethnic minority concentrations, are show in maps following in other sections of this plan, to include the Grantee Unique Appendices. Many of the dwelling units in these neighborhoods were built in the 1970's and earlier, and a substantial percentage of them are in poor condition. During the last 20 years, a very high percentage of the rehabilitation projects sponsored by the City of Bryan Community Development and HUD have been located in these neighborhoods.

NA-35 Public Housing – 91.205(b)

Introduction

The Bryan Housing Authority manages 300 duplex and townhome style units at 5 different locations in Bryan. This is the only public housing available in the area, and is the maximum number of units allowed under the Faircloth Limit. The Brazos Valley Council of Governments (BVCOG) administers the Housing Choice Voucher program for the seven-county region. There are a total of 1,643 housing vouchers available, with 1,073 vouchers in use in the City of Bryan. BHA currently has 97 families on its waitlist. Current occupancy is 96%, with 11 units vacant. All 8 handicap accessible units are occupied.

Totals in Use

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	236	1643	0	0	0	0	0

Table 22 - Public Housing by Program Type

***Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	10,272	0	0	0	0	0	0

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average length of stay	0	0	3	0	0	0	0	0
Average Household size	0	0	3	0	0	0	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	22	0	0	0	0	0
# of Disabled Families	0	0	15	0	0	0	0	0
# of Families requesting accessibility features	0	0	236	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	94	0	0	0	0	0	0
Black/African American	0	0	142	0	0	0	0	0	0

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Asian	0	0	0	0	0	0	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	73	0	0	0	0	0	0
Not Hispanic	0	0	163	0	0	0	0	0	0
*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Bryan Housing Authority (BHA) reported that all residents needing accessible units have such units. BHA reports no residents on waiting lists for Section 504 compliant units.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

BHA has identified funding for renovations as their most immediate need. Additional financial resources would allow them to continue upgrading units and improving overall energy efficiency and livability of units for residents. From a client services perspective, the most pressing needs reported by BHA staff include access to nearby job opportunities and transportation assistance. BHA currently has a number of applicants on their waiting list for housing.

For voucher holders, the most urgent challenge is finding available and affordable housing units. The Housing Choice Voucher Program waiting list, administered by BVCOG, is currently closed and is not expected to reopen until March 2027. In addition to housing, voucher recipients face several related challenges, including access to transportation, medical care and coverage, employment support, financial literacy, social and health services, and child care.

Fortunately, many of these supportive services are available through BVCOG's offices in Bryan, which are located on a bus route. This centralized location provides a "one-stop-shop" model that helps streamline access to resources. At present, there are 2,819 individuals on the voucher waiting list.

How do these needs compare to the housing needs of the population at large

These needs closely align with the broader housing challenges observed throughout the City of Bryan. Across all income levels, housing cost burden remains one of the most prevalent issues citywide. However, for voucher holders and public housing residents, who are often extremely low-income, the cost burden is often more acute. While the HCV program is designed to mitigate rental costs, the limited availability of affordable rental units constrains the program's effectiveness. This mirrors larger market trends in Bryan, where affordable and quality rental housing is in short supply.

Many low- and moderate-income households face barriers to homeownership or stable rental housing due to cost, public housing residents and voucher recipients also frequently lack access to reliable transportation, employment opportunities, and wraparound services, which further jeopardize their housing stability. These issues were also echoed in community input sessions, where residents cited transportation and access to services as top concerns across multiple income groups.

While many homeowners in Bryan experience housing quality concerns, such as substandard or aging homes, public housing units also require regular renovation and modernization. The renovation needs cited by BHA reflect broader concerns over aging housing stock in the city.

Discussion

Clearly, the most pressing need related to public housing and housing voucher assistance is funding, as the voucher program locally has inadequate federal funds to satisfy the applicant list. Also, transportation,

medical coverage and care, employment assistance, and child care are also needs reported by the BVCOG as needs seen in clients. BVCOG provides a self-sufficiency program enabling clients to save toward homeownership. The program also promotes vocational, technical or higher education and is seeking ways to address local needs. The BHA has active internal programs assisting clients with life skills, tutoring for youth, and financial literacy and continues to expand programs to assist BHA resident needs.

DRAFT

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The current Continuum of Care (CoC) includes cities and agencies within the Brazos Valley region. The lead agencies for the CoC are the Brazos Valley Coalition for the Homeless as well as Twin City Mission. The City will continue to align its work with the CoC and Brazos Valley Coalition of the Homeless. The CoC's work benefits persons experiencing homelessness or at risk of homelessness across all populations (single adults, young adults, couples, families, and veterans). Examples of coordination include codeveloping service delivery standards, identifying training needs and delivering training, contributing resources to support HMIS and coordinated entry, and engaging with people with lived experience of homelessness.

At the most recent PIT count was done on January 2025. Numbers from the January 2025 Point-in-Time Count show there were 44 unsheltered individuals and 72 sheltered individuals across 56 households. Sheltered locations included Family Promise, Phoebe's Home, and the Doug Weedon Shelter for Hope. The majority of those experiencing homelessness were adults, with 15 children also reported.

Some of the contributing factors to homelessness include high costs for housing and living expenses, low household incomes, limited support systems, and more. Individuals and families face a variety of personal challenges that can place them at greater risk of housing instability and homelessness, including mental illness, domestic violence, disabling health issues, criminal justice system involvement, lack of education, and more.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
Ethnicity:	Sheltered:	Unsheltered (optional)

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Numbers from the January 2025 Point-in-Time Count show there were 44 unsheltered individuals and 72 sheltered individuals across 56 households. The majority of those experiencing homelessness were adults, with 15 children also reported. The Emmanuel Lighthouse Mission in Bryan, operates a transitional housing shelter for homeless single women with substance abuse and other harmful addictions. The shelter also serves as a transitional housing facility for women being discharged from prison. Women may stay at the shelter for up to one year, and occasionally longer when warranted. Occasionally, ELM serves women expecting babies and serves approximately 15 women annually.

This data, combined with the information in the previous section, would suggest hundreds of individuals are receiving, or in need of housing assistance at any point in time during a calendar year. Likewise, the types of families include all categories: single adults, households with children, veterans, female head-of-household, etc. The only category not often served is unaccompanied children.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Current data on homelessness in the reflects the presence of individuals from a range of racial and ethnic backgrounds experiencing both sheltered and unsheltered homelessness. This is information gathered from the Twin City Mission.

Sheltered Homeless Population by Race:	Sheltered Homeless Population by Ethnicity:
<ul style="list-style-type: none">• White - 253• Black or African American - 237• Asian - 2• American Indian or Alaska Native - 8• Pacific Islander - 2	<ul style="list-style-type: none">• Non-Hispanic - 443• Hispanic - 59
Unsheltered Homeless Population by Race:	Unsheltered Homeless Population by Ethnicity:
<ul style="list-style-type: none">• White - 41• Black or African American - 26	<ul style="list-style-type: none">• Non-Hispanic - 53• Hispanic - 14

While White individuals comprise the largest share of both sheltered and unsheltered populations, the data shows that Black or African American individuals make up a disproportionately high percentage of those experiencing sheltered homelessness compared to their representation in the general population.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The homelessness data in the Bryan-College Station area reflects a range of needs across different populations, with notable disparities in shelter access, duration of homelessness, and service outcomes. The data shows that adult-only households comprise the largest share of the homeless population, with approximately 446 such households experiencing homelessness annually. Families with children represent a smaller but significant group, with around 69 households affected each year.

Chronically homeless individuals and families, though fewer in number, face prolonged homelessness—averaging up to 400 days—and require targeted supportive housing and services. Unaccompanied youth also face homelessness, particularly unsheltered, highlighting the need for youth-specific interventions.

Veterans represent an important population within the Bryan-College Station area. Data shows that around 26 veterans in our area experience homelessness annually. Persons living with HIV, while few, experience extended periods of homelessness at 120 days.

A notable concern is the higher number of people entering homelessness compared to those exiting, especially among single adults and youth, indicating gaps in housing availability and prevention programs.

Overall, while progress exists in sheltering families and some vulnerable groups, persistent challenges remain in addressing the needs of chronically homeless individuals, single adults, and those with complex health needs. Enhanced coordination and resource allocation are critical to improving outcomes.

Discussion:

As a contributing partner to the Brazos Valley Coalition for the Homeless, the City provides support, technical assistance, and funding not only to providers of shelter, but to health and human service agencies who deliver support services to homelessness in our community. As noted in the non-housing priority needs assessment, homeless housing options and supportive services, especially for special needs populations is regarded as a high need in our community.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Non-homeless special needs individuals often live with family members or in supportive housing facilities. This group includes elderly individuals, people with physical or developmental disabilities, those struggling with substance abuse, individuals with mental health conditions, and persons living with HIV/AIDS. Survivors of domestic violence also face similar housing and non-housing challenges, along with unique needs related to their experiences. These populations typically require a broad range of services, such as specialized healthcare, counseling, transportation, food assistance, social and recreational opportunities, employment support, and accessible or adapted housing. While many health and human service agencies provide these supports, families caring for special needs members frequently face significant stress and challenges in meeting these demands.

Describe the characteristics of special needs populations in your community:

Non-homeless special needs populations in Bryan reflect the broader community but face elevated risks of homelessness due to their unique challenges, dependence on others, and limited financial resources. These populations include the elderly, individuals with physical and developmental disabilities, persons dealing with substance abuse or mental illness, survivors of domestic violence, and people living with HIV/AIDS. Many elderly individuals with special needs are widowed and live alone despite physical frailty or disabilities. Physical disabilities affect all demographic groups, including veterans. Substance abuse and mental health issues also span diverse populations. Survivors of domestic violence have specific housing and supportive service needs; data indicates they are primarily female, with approximately half between the ages of 17 and 37.

What are the housing and supportive service needs of these populations and how are these needs determined?

The needs of these special populations align with those experienced by other communities, including access to adequate and affordable housing, health and human services, transportation, and increased supportive housing options for individuals with disabilities. Due to their unique circumstances, these groups often require specialized assistance. Effective collaboration and referrals among service providers are essential to meet these needs. Mental health care is a critical component, as is support in navigating Medicaid and overcoming related access barriers. These needs were identified through community input meetings, consultations with local service providers, and data analysis of vulnerable populations within the city.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Brazos County, which includes the City of Bryan, was identified as one of the top 25 counties in Texas with the highest number of individuals living with HIV in 2021, with over 400 residents reported to be living with the disease. Individuals living with HIV/AIDS and their families often face a range of housing and health-related challenges, including limited income, discrimination, and the need for ongoing medical care and support services.

In the Bryan area, Project Unity plays a key role in supporting this population. The organization partners with agencies such as the Brazos County Health District to ensure coordinated care. Services provided include long-term rental assistance through housing subsidies, as well as short-term financial support to help cover essential needs such as utility and medical bill payments. These efforts help stabilize housing and improve health outcomes for residents living with HIV/AIDS and their families.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Discussion:

In summary, the housing and supportive needs of the non-homeless special needs population is as varied as the various population characteristics themselves. Only with the comprehensive support services provided family members and the local health and human services providers, can these clients be assured of the supportive services and housing they need. The City of Bryan coordinates with those providers through technical assistance, program funding and other development assistance. Every effort is employed to ensure needs are identified and met without gaps or duplication of services.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Input from multiple sources indicates that public facilities for local non-profit agencies are considered important to the public. Additionally, because Bryan is an older community and, as such, has aging infrastructure/facilities, responders to survey questions and persons consulted indicated that a variety of non-housing activities (for example streets/sidewalks/water/sewer), citizen facilities, and park improvements are also important in city planning, regardless of revenue sources.

How were these needs determined?

Identification of needs was accomplished by a variety of consultation, surveys, public hearings and online surveys. Input was obtained through consultations with government entities (such as the Bryan Mayor, County Judge, and council of government Executive Director), City Engineer, Director of Parks and Recreation, general public and others. Government offices, non-profit agencies, and the public were also notified of multiple online survey opportunities for input and public hearings were held at multiple public meetings and online, virtual hearings.

Describe the jurisdiction's need for Public Improvements:

Input gathered through public surveys and hearings consistently indicated strong community support for using grant funding to address public improvements. As an older municipality, the City of Bryan faces ongoing challenges with aging and undersized infrastructure. Comments from residents, as well as input from City staff, including the City Engineer and the Director of Parks and Recreation, identified a broad range of needed improvements. These include upgrades to water and sewer systems, storm drainage, sidewalks, street repairs, and park enhancements. Residents also emphasized the importance of public facilities and general infrastructure as priority needs.

The Parks and Recreation Department maintains an extensive list of potential park maintenance, improvement, and development projects across the city. Both infrastructure and park-related projects may qualify for Community Development Block Grant (CDBG) funding, provided they are located in areas that primarily benefit low-income residents and meet applicable program eligibility criteria. Each year, the City of Bryan conducts a formal application process for public facility projects. This process is managed in accordance with Community Development Department policies and procedures, with funding recommendations reviewed and made by the Community Development Advisory Committee as part of the Annual Action Plan development.

How were these needs determined?

These needs were determined through a comprehensive and inclusive process that involved consultations with key stakeholders, public hearings, and both in-person and online surveys. The City of Bryan actively engaged a broad range of participants to ensure the assessment reflected the diverse needs of the community. Stakeholder consultations included local government officials, city staff, nonprofits, and more. Multiple online survey opportunities were promoted to residents, nonprofit agencies, and public institutions to maximize participation. Public hearings were held at several public meetings and through

virtual platforms to provide accessible options for engagement. All of this guided the development of needs and strategies outlined in the Consolidated Plan.

Describe the jurisdiction's need for Public Services:

Consultation with local officials, service providers, and community members highlighted a significant and ongoing need for a wide range of public services in Bryan. Feedback emphasized the importance of accessible health and social services, particularly in areas such as job creation, youth programming, economic development, job training, and education. Other critical service needs identified included mental health care, substance abuse treatment, domestic violence support, homeless services, and accessible public transportation.

Health and human service providers consistently identified basic needs, such as healthcare access and food security, as top priorities. Given the breadth and complexity of these needs, public service agencies serve as critical partners in delivering resources and support systems that complement the City's efforts and extend the reach of available services to residents most in need.

How were these needs determined?

These needs were determined through a comprehensive and inclusive process that involved consultations with key stakeholders, public hearings, and both in-person and online surveys. The City of Bryan actively engaged a broad range of participants to ensure the assessment reflected the diverse needs of the community. Stakeholder consultations included local government officials, city staff, nonprofits, and more. Multiple online survey opportunities were promoted to residents, nonprofit agencies, and public institutions to maximize participation. Public hearings were held at several public meetings and through virtual platforms to provide accessible options for engagement. All of this guided the development of needs and strategies outlined in the Consolidated Plan.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The City of Bryan, while experiencing steady growth in population and employment during the prior 5-Year planning cycle, continues to significantly lag both the state (62.2%) and the U.S. (65%) homeownership rate. Bryan's homeownership rate is currently 46.6% according to ACS 2023 (1-year) data. This is not unusual in college communities, however, as student rentals compete with homeownership housing, particularly for more affordable homes. Sales data from the Texas Association of Realtors shows that April single-family home sales volume in Bryan has increased year-over-year by 8.8%, and the median sales price has recently increased by 8.0% to a \$289,000 (April 2025). Active listings have increased 42%, and days on the market up slightly by seven days to a total of 102. Available inventory rose 1.6 months year over year to 4.8 months, indicating that the market is becoming more balanced between buyers and sellers. The primary factor affecting rising prices and volume is steady job growth in the MSA. Over the past five years, the number of jobs has increased an average of 3.15% per year, with 4,200 new jobs created in the community since March 2024, according to the Texas Real Estate Center. The ACS-estimated median housing value is now \$210,600, up 76% from the prior plan value of \$119,500.

Housing physical conditions have continued to improve for single family homes, and remained fairly constant for multifamily. Since the most recent physical condition survey in 2021, single family units rated Excellent increased by six percent, while Substandard and Dilapidated units declined slightly. Units rated Good and Conservable decreased by five percent. Apartment conditions saw a seventeen percent increase in units rated Good and Conservable, with no substantial change in units rated Excellent or Dilapidated.

Bryan is primarily renter-occupied, with over half of renter households experiencing a rental cost burden exceeding 30% of household income. A significant number experience severe cost burden exceeding 50% of income. Current median rent is \$1,176 per month, up from \$632 per month in the prior plan, an 86% increase. Although housing costs for both rental and homeownership have increased substantially, the overall vacancy rate has remained fairly constant at 11.5%, suggesting that while there may be sufficient units available in the marketplace, list prices of available units may exceed the capacity of many potential residents.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

According to the most recent 2023 ACS 1-year estimate, there were 33,775 occupied housing units within the City of Bryan, up from 28,925 from the 2019 plan, an increase of 17%. Of the current occupied units, 47% owner-occupied and 53% renter occupied, little changed from the 2019 data for the 2020-24 plan. Current estimated vacancy is 11.5%, up very slightly from the prior plan period. The ACS-estimated median housing value is now \$210,600, up 76% from the prior plan value of \$119,500. Current median rent is \$1,176 per month, up from \$632 per month in the prior plan, an 86% increase. It appears sufficient affordable housing units exist, with 31,025 units affordable for households with income limits up to 100% AMI, up from 24,127 in the prior plan period.

A cost burden analysis of Comprehensive Housing Affordability Strategy (CHAS) data shows over 52% of renters are cost burdened, spending over 30% of household income on housing. Conversely, only just over 21% of homeowner households experience cost burden. There are 3,975 renter households that have monthly costs between 31% and 50% of the household's monthly income (down significantly from 7,285 in the prior plan), and 1,985 owner households in this cost burden range, also down significantly from 2,989 in the prior plan.

Of more concern, there are 4,195 renter occupied units experiencing severe housing cost burden, expending more than 50% of household income on rent (down slightly from 4,285 in the prior plan). There are 1,300 owner households in this category, up slightly from 1,224 in the previous plan period.

CHAS data indicates there are 11,730 renter households below 100% AMI, and 3,935 above 100% AMI, while owners had 6,750 below 100% AMI and 8,610 above. In total there were 18,840 households below 100% AMI and 12,545 above. This is little changed from the 16,900 below and 12,025 above 100% AMI noted in the prior plan.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	18,135	53%
1-unit, attached structure	1,135	3%
2-4 units	4,790	14%
5-19 units	4,165	12%
20 or more units	3,425	10%
Mobile Home, boat, RV, van, etc.	2,505	7%
Total	34,155	100%

Table 26 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	145	1%	830	5%
1 bedroom	270	2%	3,110	20%
2 bedrooms	2,240	15%	7,065	46%
3 or more bedrooms	12,640	83%	4,345	28%
<i>Total</i>	<i>15,295</i>	<i>101%</i>	<i>15,350</i>	<i>99%</i>

Table 27 – Unit Size by Tenure

Data 2016-2020 ACS
Source:

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The Housing Authority of the City of Bryan owns and operates 300 duplex and townhome-style Public Housing rental units targeted to low, very low, and extremely low-income households. This is the maximum number of public housing units possible under the HUD Faircloth limits.

In Bryan, there is one Section 202 Housing Program, Crestview Apartments, for low-income elderly and disabled. These apartments offer a variety of supportive programs. There are 138 one-bedroom apartments and 6 two-bedroom apartments.

The LIHTC program is a federally funded manner of stimulating construction and rehabilitation of affordable housing by reducing federal income tax liability. The Texas Department of Housing and Community Affairs (TDHCA) is responsible for awarding tax credits to qualifying residential developments. Bryan has 764 LIHTC units targeted to low- and moderate-income households. Of these units, 141 units at the Mid Towne Apartments Homes are reserved for elderly residents. The remainder are for the general population. There are an additional 488 LIHTC units in Brazos County that are outside the City of Bryan, but which also serve the community. Of those, 172 are reserved for elderly residents.

Nonprofit CHDO Elder Aid operates 24 HOME-financed single family rental units restricted to elderly low to moderate income occupants in Bryan. Of these, 14 units are still within the affordability period, and one (1) unit is currently under construction, for a total of 15 single family properties with active HOME Land Use Restriction Agreements serving households under 60% of the Area Median Income. Elder Aid also owns and operates 21 rental units in College Station for low-income elderly rentals which serve the community.

The Brazos Valley Council of Governments provides Housing Choice Voucher assistance in the area. There are currently 1,073 Housing Choice Vouchers in use within the City of Bryan, targeting households earning up to 50% of the Area Median Income. A total of 1,643 vouchers are in use in Bryan and the surrounding seven-county area, consisting of Brazos, Burleson, Grimes (excluding the City of Navasota), Leon, Madison, Robertson, and Washington (excluding the City of Brenham).

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Of the 15 Elder Aid HOME units currently under an affordability period, three (3) will expire within the next five years. No other restricted properties are known to have restrictions expiring during the 2025-2029 5-year Consolidated Plan period.

Does the availability of housing units meet the needs of the population?

While the vacancy rate is approximately 11.5%, which may indicate an adequate number of housing units. There is a lack of affordable units for lower-income residents, as shown by the number of cost-burdened and severely cost-burdened renter households. Additionally, a years-long Section 8 housing voucher waiting list indicates that there is still a need for additional affordable rental units. The high vacancy rate and large number of cost burdened households may indicate that many higher income households are occupying a significant number of more affordable units.

Describe the need for specific types of housing:

Consultation with local agencies, government offices, and citizen input indicate the local area is in need of permanent supportive housing for special needs, elderly, and large family (5+ member) rental units. Also, there is a need for new homebuyer developments affordable to homebuyers in the 50-80% AMI range.

Discussion

While the number of available units may be sufficient for the current population based on the number of vacant units, it is apparent from the cost burden data that the price distribution of the available rental units does not meet the needs of the low to moderate income population.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Housing affordability impacts not only decisions related to housing choice, but, if the household spends between 30% and 50% of its income on housing costs, the household may be at increased risk of the impact of being housing cost burdened, being unable to afford other basic necessities, such as food, clothing, transportation, medical, housing maintenance, etc., and are at greater risk for foreclosure, eviction, and Code Enforcement actions. The City's goal is to partner with public and private entities to ensure there are adequate safety net programs and services in place to assist low to moderate income homeowner, buyer, and tenant households to overcome the negative effects of cost burden.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	119,500	158,000	32%
Median Contract Rent	632	766	21%

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	2,440	15.9%
\$500-999	9,399	61.2%
\$1,000-1,499	2,575	16.8%
\$1,500-1,999	405	2.6%
\$2,000 or more	520	3.4%
Total	15,339	99.9%

Table 29 - Rent Paid

Data Source: 2016-2020 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	985	No Data
50% HAMFI	4,100	1,910
80% HAMFI	10,595	4,885
100% HAMFI	No Data	6,814
Total	15,680	13,609

Table 30 – Housing Affordability

Data Source: 2016-2020 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	839	904	1,024	1,455	1,571
High HOME Rent	660	767	911	1,125	1,235
Low HOME Rent	600	642	771	890	993

Table 31 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

The 2023 ACS 1-year estimate shows 33,775 occupied housing units in Bryan (46.6% owner-occupied and 53.4% renter occupied). Estimated vacancy rate is 11.5%. The median housing value is \$210,600 (ACS2019-23), up from \$119,500 in 2019, and the median gross rent is \$1,176. At first impression, there appears to be a sufficient number of available housing units, 36,566 (2023 ACS 1-year), up from 24,127 units in 2019. There are a total 33,775 households (2023 ACS 1-year), indicating excess available units of about 2,791. CHAS shows a total of 29,289 units affordable to households earning up to 100% of the HUD Area Median Family Income (HAMFI). Also based on CHAS data, there were 18,480 households below 100% HAMFI (12,545 above 100% HAMFI). However, CHAS indicates that there is an acute shortage of units available to renters earning below 50% HAMFI. The data indicates there are only 985 units priced to serve renter households earning up to 30% HAMFI, while there are 4,470 renter households earning under 30% HAMFI, a severe deficit of 3,485 units. For the 4,100 renters in the 30% to 50% HAMFI range, CHAS data indicates there is actually a surplus of 1,725 units available, while the 10,595 renters in the 50%-80% HAMFI range have a large surplus of 8,780 affordable units. This pattern is also evident in ownership units, with an acute shortage of 2,115 units available for purchasers under 50% AMFI, with significant surpluses of units for households in the 80%-100% HAMFI (approximately 7,544 total unit surplus).

The high vacancy rate and large number of cost burdened households may indicate that many higher income households are occupying a significant number of more affordable units.

How is affordability of housing likely to change considering changes to home values and/or rents?

Sales data from the Texas Association of Realtors shows that April single-family home sales volume in Bryan has increased year-over-year by 8.8%, and the median sales price has recently increased by 8.0% to a \$289,000 (April 2025). Active listings have increased 42%, and days on the market up slightly by seven days to a total of 102. Available inventory rose 1.6 months year over year to 4.8 months, indicating that the market is becoming more balanced between buyers and sellers. The primary factor affecting rising prices and volume is steady job growth in the MSA. Over the past five years, the number of jobs has increased an average of 3.15% per year, with 4,200 new jobs created in the community since March 2024, according to the Texas Real Estate Center. The ACS-estimated median housing value is now \$210,600, up 76% from the prior plan value of \$119,500. As valuations increase, associated homeownership costs for insurance and property taxes also increase.

One measure of home purchase affordability is the median multiple method, using the ratio between the median house price and the median household income (Demographia International 2024). Ratios under 3.0 are considered affordable, with higher ratios indicating less affordability. Currently the median multiple Housing Affordability Rating in the City of Bryan is calculated by dividing the median home price of \$289,000 by the median household income of \$53,006, resulting in a 5.45 ratio, considered severely unaffordable to most households. By comparison, in 2020, the median home price in Bryan was \$198,200, and the median household income was \$49,181, resulting in a median multiple ratios of 4.03, a .28 per year, or 7% annual increase. This trend is expected to continue, as demand for homes remains high, and property values are high. The supply of homeownership units is not expected to increase more rapidly because of the rising cost of building materials, mortgage interest rates, and homeowner insurance. While many homeowners purchased or refinanced in recent years with very low interest rates below three percent, interest rates are currently over 6.5 percent, which has the effect of discouraging existing owners from selling and further limits the supply of units available. Although there is increasing inventory, home prices continue to rise, and homes are expected to remain unaffordable for most low to moderate income purchasers for the near term.

The current median gross rent of \$1,176 per month is affordable to those earning the median income of \$4,417 per month. The payment ratio is below 30% (26.6%), which is considered affordable. This is attributable to the excess supply of units for households earning above 80% HAMFI. Rental unit supply continues to rise in the community, primarily in the student housing market. Texas A&M University has capped enrollment, however there are many additional planned units expected to come online. This should have the effect of continuing to soften rental rates.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Final FY 2025 & Final FY 2024 FMRs By Unit Bedrooms

Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
High HOME Rent	775	830	996	1,150	1,283
Low HOME Rent	988	1,059	1,206	1,463	1,613
FY 2025 FMR	1,034	1,089	1,206	1,690	1,863
FY 2024 FMR	958	1,015	1,140	1,606	1,710
FY 2020 FMR	682	791	938	1,353	1,647

The current median rent over all bedroom sizes is \$1,176 per month, up from \$632 per month in 2020, an 86% increase, or a 17% per year annual increase. Fair Market Rents and HOME rents have not kept pace with market rents. FMR's increased on average 31% over all bedroom sizes, or 6% annually. High HOME rents increased only 8%, or 2% annually, and Low HOME rents increased 63%, or 13% annually. The failure of subsidized rental rates to keep pace with market rents reduces the likelihood that developers and investors will consider producing new subsidized rental units, and will likely allow rental developments with existing rent restrictions to revert to market rates when current restrictions expire.

Discussion

CHAS data indicates that the primary policy focus should be to increase the housing supply for the lowest income residents experiencing the greatest need. As subsidized rental rates have failed to keep pace with market increases, subsidized developments are less likely to be attractive to developers and investors without significant initial subsidies by governments, such as LIHTC and HOME. Other possible tools to increase the supply of housing include further relaxing of zoning restrictions such as minimum lot sizes and unit density restrictions, as well as incentivizing infrastructure installation in older, low-income neighborhoods where lots were platted but the original developers failed to install streets and utilities. Other opportunities might include making surplus institutional land available for development (city, school districts, universities, etc.), and assisting property owners with demolition and clearance of dilapidated structures, and to clear clouded titles. Additionally, the City will look for opportunities to deploy its HOME and CDBG resources to collaborate with public and private entities to leverage available resources to ensure there are adequate safety net programs and services in place to assist low to moderate income homeowner, buyer, and tenant households to overcome the negative effects of cost burden.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

In September of 2024, the City of Bryan Community Development Department received data from the Brazos Central Appraisal District (BCAD) to assist in analyzing trends in housing conditions across various property types, including traditional single-family homes, apartments, duplexes, triplexes, townhomes, and similar units. Units were analyzed by sorting data based on several BCAD categories: year built, improvement class, depreciation, and adjusted percent-good. The newly collected data was then compared with the 2021 and 2019 data to provide insights to local housing conditions. Manufactured housing was not included in this update, as manufactured homes are no longer allowed by right under the current zoning ordinance, and are no longer considered part of the permanent housing stock of the City.

Data and Sorting

- The 2024 BCAD data included information on 23,829 residential units, compared to 32,470 in 2021 and 31,400 in 2019. It is important to note that manufactured homes were not included in the most current analysis.
- **Single-family units** were analyzed by sorting data based on BCAD categories of year built, improvement class, depreciation, and adjusted percent good.
- **Plex-units (duplex, triplex, etc.), townhomes, condos,** and other comparable units were also sorted using year built, improvement class, depreciation, and adjusted percent good.
- **Apartments** were specifically analyzed using calculations for remaining depreciation.
- Units were classified into four primary condition categories: **excellent, good/conservable, substandard, and dilapidated.**
- While sorting parameters were generally effective, there were some cases where units exhibited factors that warranted a reclassification. In these instances, adjustments were made to ensure appropriate condition category.
- To further ensure accuracy, Building and Standards data was used to verify and validate the classification of homes as substandard or dilapidated.
- To estimate the number of substandard or dilapidated **owner-occupied dwellings**, BCAD data was reviewed for designations commonly associated with owner-occupancy. This included reviewing exemptions and identifying properties where the owner's mailing address matched the property address.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

Definitions

The U.S. Dept. of Housing and Urban Development (HUD) requires that the City define and quantify “Standard” and “Substandard but Suitable for Rehabilitation” with regards to residential housing units. The City’s “Substandard but Suitable for Rehabilitation” rating is used to define units that, while substandard, are suitable for rehabilitation. Properties rated as “Dilapidated” are not suitable for rehabilitation.

For the City's CDBG/HOME grant funded programs, housing units defined as ***Substandard - Suitable for Rehabilitation*** are those requiring significant repair. These units are, with minimal renovation, structurally sound, but due to lack of maintenance and repair, are in jeopardy of falling into a dilapidated state if needed renovations are delayed or ignored. To be considered for rehabilitation assistance, the estimated after-rehab appraisal of the unit must be equal to or greater than 50% of the pre-rehab appraisal added to the rehabilitation costs.

The city's category of ***Substandard - Not Suitable for Rehabilitation*** is not suitable for rehabilitation and is considered dilapidated. These structures often do not provide safe or adequate shelter and may endanger the health, safety and well-being of the occupants. Repair costs could exceed 50% of the value of the dwelling. Such units have one or more critical defects or a combination of a number of deficiencies so as to require considerable repair of the substandard construction. Many of these structures are vacant.

Following are City of Bryan Housing Condition definitions

Standard Condition: Improvements / structures which are determined to be in compliance with the City of Bryan Building Codes.

Substandard Condition: Improvements / structures which are determined to be in non-compliance with the City of Bryan Building Codes.

Substandard - Suitable for Rehabilitation (Rehabable): An improvement/structure which is structurally sound, and for which the cost to address the identified City of Bryan Building Code deficiencies will not cause the total property indebtedness to exceed 90 percent of the after-rehabilitation property value

Substandard - Not Suitable for Rehabilitation (Non-Rehabable, Dilapidated):

(For the purposes of Section 104(d) of the Housing and Community Development Act)

1) Structurally Infeasible for Rehabilitation: An improvement/structure in which the majority of the primary structural components have deteriorated to the extent that the physical integrity is seriously compromised. The structure can only be brought into code compliance through new construction activities.

2) Economically Infeasible for Rehabilitation: An improvement/structure for which the cost required to address the identified City of Bryan Building Code deficiencies will cause the total property indebtedness to exceed the after-rehabilitation property value.

NOTE: By local definitions, Substandard Condition and Not Suitable for Rehab defines dwelling units that are in such poor condition as to be neither structurally nor financially feasible for rehabilitation, and Substandard Condition but Suitable for Rehab defines dwelling units that do not meet standard conditions but are both financially and structurally feasible for rehabilitation. This does not include units that require only cosmetic work, correction of minor livability problems, or maintenance work.

The following definitions were used for the housing condition survey:

- **Excellent:**
 - Typically newer, well-maintained homes with high-quality construction, minimal to no issues in critical areas, and no immediate repair needs.
- **Good/Conservable:**
 - Homes in sound condition that might require minor maintenance. Critical areas of the home like roofing, electrical, and plumbing are functional but may need minor attention.
- **Substandard:**
 - A structure needing significant repairs beyond normal maintenance, with possible Building Code deficiencies, but financially and structurally viable for rehabilitation.
- **Dilapidated:**
 - A structure in severe disrepair, with critical issues that may pose health and safety risks to occupants, often vacant.

Standard Condition homes are considered to be those in the Good/Conservable and Excellent categories. Substandard but Suitable for Rehabilitation are in the Substandard category above.

From 2021 to 2024, for single family residential housing units, there was a 6% increase in units rated Excellent, while units rated Substandard and dilapidated experienced a slight decline of 1%. For

Single Family

20,400 Single Family non-apartment, non-manufactured units were evaluated, as well as 3,429 plex, townhome, and similar units (23,829 total):

Excellent (25%) 6,024 – SF homes, townhomes, plex units, etc. (compared to 4,153 - 19% in 2021, 3,074 - 15% in 2019 and 2,281 - 14% in 2015)

Good/Conservable (71%) 16,920 - SF homes, townhomes, plex units, etc. (compared to 16,634 - 76% in 2021, 16,610 – 80% in 2019 and 12,246 – 75% in 2015)

Substandard (3%) 749 - SF homes, townhomes, plex units, etc. (compared to 829 – 4% in 2021, 883 – 4% in 2019 and 1,664 – 10% in 2015)

Dilapidated (1%) 136 - SF homes, townhomes, plex units, etc. (compared to 141 – 1% in 2021, 167 - 1% in 2019 and 162 – 1% in 2015)

Multifamily

10,713 Multifamily apartment units were evaluated (NOTE: apartments were not reviewed in 2015 so only comparisons between 2019 and 2021 are made):

Excellent (30%) 3,182 - apartment units (compared to 4,412 (41%) in 2019)

Good/Conservable (30%) 3,257 - apartment units (compared to 4,554 (43%) in 2019)

Substandard (35%) 3,771 - apartment units (compared to 928 (9%) in 2019)

Dilapidated (5%) 503 - apartment units (compared to 779 (7%) in 2019)

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,560	23%	8,035	52%
With two selected Conditions	320	2%	645	4%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	11,405	75%	6,685	44%
Total	15,285	100%	15,365	100%

Table 32 - Condition of Units

Data 2016-2020 ACS
Source:

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	4,010	26%	3,960	26%
1980-1999	4,495	29%	6,270	41%
1950-1979	5,679	37%	4,555	30%
Before 1950	1,100	7%	574	4%
Total	15,284	99%	15,359	101%

Table 33 – Year Unit Built

Data 2016-2020 CHAS
Source:

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	6,779	44%	5,129	33%
Housing Units build before 1980 with children present	3,244	21%	1,530	10%

Table 34 – Risk of Lead-Based Paint

Data 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)
Source:

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 35 - Vacant Units

Need for Owner and Rental Rehabilitation

The ACS data above indicates 25% of owner units have reportable conditions and may need repairs, while 56% of renter units have conditions reported (HUD's data source for this document). While the City concentrates CDBG/HOME funds in owner occupied housing programs, staff provides technical assistance and guidance to landlords seeking to upgrade rental properties. The owner demographics also show that households who are low-income and moderate-income may live in housing units that have housing problems in which the owner is unable to repair due to a financial hardship. These circumstances can affect the health and safety of children and the elderly. Many such residents of Bryan have relied on the City for minor home repair assistance (includes immediate health/safety concerns), lead based paint testing, accessibility for disabled residents, and major rehabilitation and reconstruction needs. As noted earlier, BCAD data was analyzed and, based on that analysis, it's estimated that approximately 4,520 Substandard owner and rental structures exist within the city limits of Bryan. It's also estimated that approximately 136 single-family and approximately 503 dilapidated rental structures exist within Bryan.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

The ACS data shows that potential lead-based paint hazards might be found in 44% of all owner housing and 33% of rental housing, as these units were constructed prior to 1980. In all 21% of owner housing units and 10% of rental housing units built prior to 1980 are occupied by families with children present, a total of 4,774 housing units. As housing units and neighborhoods age, they are typically passed down from middle or moderate-income households to lower income households. As a result, it is reasonable to assume that most of the units in Bryan built prior to 1980 are occupied by families with children are also low to moderate-income families.

Discussion

The City of Bryan's collaboration with BCAD allows the City to assess local property conditions, so as to plan and develop effective programs to address local housing needs. The next five-year period will involve partnerships with other local private and public housing providers and will combine federal grant funds with other leveraged resources. The sorting and analysis of these residential properties will allow assessment of the scope of overall property conditions and helps to identify programmatic remedies. Given the demand for services and limitation, on local and federal funding, it appears program and incentive efforts should be directed at conditions that erode neighborhood safety and integrity, specifically for substandard and dilapidated housing units.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			300			1643			
# of accessible units									

***Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

The Bryan Housing Authority manages 300 duplex and townhome style units at 5 different locations in Bryan. This is the only public housing available in the area, and is the maximum number of units allowed under the Faircloth Limit. The Brazos Valley Council of Governments (BVCOG) administers the Housing Choice Voucher program for the seven-county region. There are a total of 1,643 housing vouchers available, with 1,073 vouchers in use in the City of Bryan. BHA currently has 97 families on its waitlist. Current occupancy is 96%, with 11 units vacant. All 8 handicap accessible units are occupied.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Bryan Housing Authority's 300 public housing units are generally in good condition, with many units currently undergoing updates, or which have been updated and renovated over the last few years to include roofs, energy efficiency upgrades, as well as other typical upgrades (appliances, fixtures, flooring, paint). 2021 XRF Lead-based paint testing shows no lead-based paint in any of the properties. 2023 Asbestos testing indicated small amounts of non-friable asbestos in floor mastic, drywall texture and joint compound, exterior door caulk, window glazing, and exterior

window caulk. Asbestos abatement is currently being conducted as units become vacant. Radon testing is currently being performed to ensure that there is no radon risk. BHA has adequate units available to satisfy Section 504 accessibility requirements. In the most recent 2021 HUD inspection, the BHA units scored a 94 out of a possible 100.

DRAFT

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 37 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

BHA plans additional future renovations, to include typical upgrades (appliances, fixtures, flooring, paint, etc.), sanitary sewer improvements, and asbestos abatement. The properties are generally in good condition, with many units updated and renovated over the last few years. Recent renovations included energy efficiency upgrades, as well as other typical upgrades and future asbestos abatement as units become vacant. BHA has adequate units available to satisfy Section 504 accessibility requirements. As noted above, the BHA units scored a 94 in their most recent property inspection.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

BHA is currently utilizing Capital Funds grants for testing, remediation, and improvements. BHA continues to have a Service Coordinator to coordinate services to residents such as budgeting, homeownership training, parenting skills etc. as well as partnering with other agencies to provide training or information meetings. In addition, there are services geared toward youth residents such as 4H, Safe Sitter Classes, and Reading Programs in collaboration with BISD, Learn Eat Grow & Go a nutritional program, and youth gardening. BHA continues to provide affordable, safe and decent housing for low-income residents. The City of Bryan's Community Development Department coordinates regularly with the BHA to share information and provide homebuyer training and to make down-payment assistance available to eligible BHA residents.

Discussion:

Rental assistance provided by the Bryan Housing Authority and the Brazos Valley Council of Governments Housing Choice Voucher Program is critical to those lower-income households that may otherwise be in jeopardy of not being able to afford basic necessities. In addition, the City of Bryan partners with BHA by providing technical assistance on housing, health and social service endeavors whenever possible. Because of the assistance provided by the Bryan Housing Authority, the Brazos Valley Council of Governments, and the City of Bryan, residents otherwise at significant risk of homelessness can afford adequate shelter and resources.

DRAFT

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Twin City Mission (TCM)'s Doug Weedon Shelter of Hope Case Manager/Client Assistance Program (formerly the Bridge), located in Bryan serves the regional homeless. Operated by Twin City Mission (TCM), the Bridge program provides case management services, clothing, and personal care items. TCM also maintains Phoebe's Home, the regional domestic violence services shelter. Shelter and supportive services are provided to homeless women by Emmanuel Lighthouse Mission, a ministry of Emmanuel Baptist Church in Bryan. The program serves women struggling with addiction or other challenges like crisis pregnancies, and is designed to meet their spiritual, emotional, and physical needs. Save Our Streets (SOS) Ministries offers homeless men a 9-to-12-month program that encouraging spiritual and emotional development. Participants are provided housing, life skill counseling, financial literacy training, and employment through the SOS work program. Family Promise of Bryan/College Station maintains a facility to provide shelter and public services for case management for homeless families. The agency attracts local, state, federal, and other charitable funding to operate and provide services. Sweet Oak Collaborative serves the homeless with resource identification, affordable housing units, transitional housing, food pantry services, transportation, and case management. Unlimited Potential (UP)'s – Home Base for Transitioning Foster Youth Program provides case management and other support services to youths in the Texas Foster Care program as they transition out of foster care. Bryan ISD Project Hope is a district program designed to support students facing homelessness and those in foster care by providing resources including educational support, advocacy, and direct assistance to students and families in need.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	63	0	0	0	0
Households with Only Adults	115	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 38 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Local homeless and health and human service providers have programs in place and are equipped to provide a wide variety of services meeting the needs of local homeless persons, to include: shelter and other basic needs (food, clothing, dental and health care), mental health care, drug/alcohol abuse assistance, counseling, employment assistance, transportation, veteran benefits, domestic abuse assistance, and information and referral to other needed services.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Twin City Mission (TCM)'s Doug Weedon Shelter of Hope Program (The Bridge) provides an emergency shelter for homeless men, women, and families and supportive services. Services include transportation, nutritious meals, daily needs (clothing, toiletries) and case management. The Mainstream Bridge Program includes additional case management and educational training classes with the goal of preparing and equipping clients to leave the shelter for permanent housing and self-sufficiency. The Bridge typically serves approximately 500 unduplicated clients during each program year.

TCM's facility is a 24,000 square foot homeless shelter and is 15 years old. It is located south of downtown on South Randolph Street near 30th Street. The design is configured with a central hub reception area with radiating wings like the spokes of a wheel, which allows staff to monitor and view each corridor. This shelter has a bed capacity of 128 beds for individuals; including 56 beds for men and 28 beds for women. Twelve (12) additional beds have been designated for chronically homeless men, and 8 for chronically homeless women needing permanent supportive housing. Additionally, seven units (24 beds) are designated for families and several rooms are designated for the disabled. Total beds equal 128.

The Haven is a Low Income Housing Tax Credit development in College Station that provides 24 units of transitional housing specifically to homeless. This project expands the existing Housing Services program and provides increased services to assist in self-sufficiency. Outreach and assessment are handled by a variety of local social service providers. As homeless and potentially homeless individuals are identified, they are referred to TCM. A full-time case manager at The Bridge facility assists in needs identification and delivery of appropriate services. A list of facilities and services available to the homeless persons includes:

Twin City Mission The Bridge Shelter - Emergency housing for men, women, or families. Provides food, clothing, laundry supplies, and personal hygiene products. Clients may access case management services.

Twin City Mission Housing Services - A transitional housing program provides Rapid Rehousing of up to 24 months of rental assistance, case management, food, referrals to mainstream services, budgeting, job

training, and life skills. The Rapid Re-Housing program provides 100% rental assistance for 8 months, including other supportive services. This program serves approximately 150 people per year.

Family Promise of Bryan-College Station - Provides a day facility and overnight shelter, meals, transportation, job search assistance, and case management services to homeless families with children under the age of 18 (transitional housing)

Emmanuel Lighthouse Mission - Transitional housing for homeless women, offering budgeting, life skills, job search assistance, and faith-based peer counseling

Save Our Streets (SOS) Ministries - Provides a 9-to-12-month men's program providing housing, life skills counseling on relationships, financial literacy, and employment opportunities.

Brazos Valley Council of Governments - Provides prioritization of homeless applicants on BVCOG's Housing Choice Voucher Program.

Unlimited Potential (UP) Provides case management and other support services to youth aged 18-25 leaving the Texas Foster Care program. UP is in the process of building transition housing at their new facility at 1115 Anderson Street in College Station.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Special needs populations in Bryan include: the elderly; frail elderly; persons with mental, physical, or development disabilities; persons with HIV/AIDS; and persons struggling with substance abuse. Many in these populations rely on health and human service providers, and/or family members for support and services. The City of Bryan assists and supports the community in these efforts, providing funding and technical assistance to local for- and not-for profit entities that serve these populations. A variety of entities like the local Community Partnership Board, consisting of approximately 80 agencies, coupled with charitable housing providers, for-profit developers, state funded agencies, and subsidized housing developments, helps to identify, prioritize and deliver needed services to special needs clients.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Consultation with local agencies, surveys, and focus groups indicated that supportive housing needs include the developmentally disabled, physically disabled, single persons and large families, Section-8 tenants, domestic violence victims, those with substance abuse disorders, the mentally and physically disabled, and elderly. Agencies reported the need for rental assistance, emergency food, rent, utility, and security deposit assistance, affordable child care, financial literacy training, reliable medical needs transportation, workforce development/job training, mental health services, addressing Spanish language barriers, resource coordination, and counseling are also needed. Additionally, geographic displacement was identified as a concern, as those seeking mental health and substance abuse counseling often exit these services with no means to return to their home community and support group. In terms of provider collaboration, agencies reported often sharing referrals and replicating services. They also often or always refer clients to United Way's 2-1-1 for further assistance.

Housing providers for the elderly and disabled include the following:

Crestview Terrace
Crestview Place
Crestview Unity
Highland Villas
Mid Towne Apartments
Sandy Creek Apartments
Saddlewood Club Apartments
Hudson Creek Alzheimer's Special Care Center
Isle at Watercrest
Waldenbrooke Estates
Arbor Oaks at Crestview
St Joseph Manor Assisted Living

Millican House
Dansby House
Park Place
Carriage Inn
Bryan Housing Authority

Supportive services are provided by the following agencies:

Frail elderly

Brazos Valley Aging and Disability Resource Center
Brazos Valley Community Action Agency

Elderly

Elder-Aid
CHI St. Joseph Health System
Brazos Valley Council of Governments
Brazos County Senior Citizens Association

Mentally Ill

Brazos Valley Mental Health and Intellectual Disabilities Services
MHMR of the Brazos Valley
National Alliance on Mental Illness of Brazos Valley
Brazos Valley Community Action Agency

Disabled

MHMR of the Brazos Valley
Brazos Valley Center for Independent Living
Brazos Valley Council of Governments
Brazos Valley Rehabilitation Center
Junction Five-O-Five
TAMU Center on Disability and Development
TAMUS Courtney Cares Equine Assisted Services
The Arc of Bryan-College Station
Down Syndrome Association of the Brazos Valley
Magical Muzzles and Manes

Substance abuse/addiction

Brazos Valley Council on Alcohol and Substance Abuse
 Narcotics Anonymous
 Brazos Valley Intergroup
 A&M Church of Christ
 Everyday Life, Inc.
 CrossCentral Church and Recovery Center:
 Brazos Valley Community Action Agency

Persons with HIV/AIDS

Project Unity

Bryan Affordable Housing Properties				
Name	Type of Housing/Assistance	Target Population	Number of LMI Units	Number of Disabled Units
Midtown Manor (fka Emerald Park) Apts	LIHTC/Rental Assistance	Low/Mod Income	47	
Saddlewood Club	LIHTC/Housing Choice Vouchers	Low/Mod Income/Disabled	232	1
Forest Park Apts	LIHTC/Housing Choice Vouchers	Low/Mod Income/Disabled	119	9
Mid Towne Apts	LIHTC/Rental Assistance	Low/Mod Income/Disabled/Elderly	80	15
Highland Villas	LIHTC/Rental Assistance	Low/Mod Income/Disabled	180	13
Crestview Terrace	Section 202	Elderly	100	
Crestview Place	Section 202	Elderly	44	
Crestview Unity	Section 202	Elderly	63	
Elder Aid	HOME	Low/Mod Income/Disabled/Elderly	14	14

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Hospitals and healthcare facilities in Bryan and College Station have policies in place ensuring persons discharged will receive assistance from their appointed case management staff in obtaining appropriate placement to fit the patient's individualized needs. Those facilities consult with the Brazos Valley Coalition for the Homeless regarding discharge policies, which assure that, to the best of the ability of the discharging entity, released patients will not be discharged into homelessness but to a state, federal, emergency or

transitional facility. Local homeless service providers and other social service agencies regularly collaborate with discharge staff from these facilities to identify placements for patients that are most suited for their needs and that do not result in the patient becoming homeless.

The State of Texas contracts with Mental Health Mental Retardation Authority of Brazos Valley (MHMR) to ensure newly discharged patients have a place to go or reside, thereby minimizing the potential of patients being discharged onto the street and into a state of homelessness. MHMR developed a comprehensive plan for patients to be discharged, networking with existing family, state-funded community agencies and with the patient. This plan includes where the patient will live, whether with family, in a basic care facility, adult foster care facility, and an independent living facility or in a nursing home. The plan also coordinates with supporting people, entities and agencies (like local, state or governmental agencies) to provide ongoing stability and support services. This synergy of efforts help ensures the patient is transitioned into a supportive system that takes their well-being into account.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Through its public service agency partners, the City will assist special needs populations, including the elderly, persons with disabilities and persons with alcohol /drug addictions with housing and supportive services by evaluating needs and provided avenues to address needs by:

1. Provide funding and technical assistance through the City's Community Development Housing Assistance programs, including the minor repair program, major rehabilitation/reconstruction program, housing development program and coordination of efforts with nonprofit housing developments and organizations for safe affordable housing.
2. Provide funding and/or technical assistance to Public Service agencies that provide supportive services to special needs populations including the elderly, disabled (mental/physical/adult/children and developmental) HIV/Aids, alcohol/drug addiction for social and health services.
3. Coordinate efforts to address housing and supportive services needs for special needs populations with community agencies.
4. Assist public housing residents through technical assistance and coordinating with public service providers to address housing and supportive service needs to achieve self-sufficiency and reduce dependency on federally assisted public housing.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The priority housing and supportive service needs of persons who are not homeless but who may or may not require supportive housing (i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents) will be addressed via providing HOME funding and technical assistance through the City's Community Development Housing Assistance programs, including the major rehabilitation/reconstruction program, housing development program, and coordination of efforts with nonprofit housing developments, CHDO's and other organizations for safe affordable HOME-assisted housing in these sub-populations. The City does not intend to utilize Tenant Based Rental Assistance.

DRAFT

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Bryan has reviewed its own policies including property tax policies, land use controls, zoning ordinances, building codes, fees and charges. No policies were identified that would negatively affect residential investment. Development regulations are intended to protect the health, safety, and welfare of the public. The City of Bryan works to carefully balance public welfare and safety with cost-reasonable policies which encourage investment in the community. The City has no impact fees, parkland dedication fees are reasonable, and has adopted building codes which balance safety and development costs. Permitting has been simplified and approvals accelerated by implementation of new permit automation software through Citizen serve. By ordinance, the City routinely waives permit, inspection, and application fees for its HOME and CDBG program projects, and for nonprofit housing providers as well. By resolution, the City has the ability to waive any City liens (code enforcement demotion, cleanup, mowing, etc.) at the request of a nonprofit housing provider intending to purchase a property for affordable housing development.

Also, the City Council has directed additional efforts to encourage affordable housing development for infill in established subdivisions through property tax foreclosure auctions with general funds, and to use tax-foreclosed properties as incentives for affordable housing development. Additionally, the City's federal HOME program funds are utilized to develop and incentivize affordable housing directly, and through its nonprofit housing development partners, including Elder Aid and Habitat for Humanity. Additionally, the City works in partnership with local banks and developers to encourage affordable housing development throughout the City by leveraging federal funds, technical assistance, and donated surplus land, such as the recently-completed 54-home development at Hopes Crossing.

Local efforts strongly encourage development and preservation of affordable housing. Property taxes are kept at as low a rate as possible, while maintaining quality basic services to residents. Grant funds are utilized to preserve existing affordable homes through the minor repair and major rehabilitation/reconstruction programs. CDBG funds are also utilized to provide Spot Slum/Blight clearance for low-income property owners so that lots can be cleared without liens that would hinder redevelopment. Primary barriers to affordable housing development are rising construction material, insurance, and labor costs, in addition to clouded or fragmented title to properties. The City has recently sponsored educational workshops for residents and low-income housing assistance recipients to encourage the use of wills and other estate planning tools to reduce the possibility of fractured titles.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

Bryan offers a positive, growing economic climate. Located adjacent to Texas A&M University and the TAMU System's RELLIS campus and within the Texas Triangle between Austin, Houston, and Dallas, Bryan has a trade area with a population of approximately 226,000 within a 45-minute drive, and just over a million within a 60-mile radius. The City has cultivated economic development assets such as Texas Triangle Park, a 1,000-acre plus rail-served industrial property in northeast Bryan which is designated a Foreign Trade Zone, the Lake Walk master-planned corporate campus development at Lake Walk Town Center, and benefits greatly from the collaborative ecosystem of the RELLIS Campus which provides research technology development, and hands-on career training. Also, the City has invested heavily in its vibrant downtown area, including a railroad quiet zone. These factors create a highly positive environment for employment, and anchor opportunities in the City for a robust housing market, healthcare, retail, and other human needs. The following analysis details opportunities and needs related to jobs, education, job training and higher education in the local community. This information allows the City to determine if gaps in employment or employment services exist and how those needs may be addressed. The City of Bryan Community Development Department works closely with the Economic Development staff to assist in facilitating economic opportunities through agencies such as the Research Valley Partnership, Bryan Commerce and Development, the Bryan Business Council. The City also provides funding and assistance to local private businesses, agencies, and educational entities that provide education, job training, or those that generate job creation and economic activity.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	874	1,320	3	4	1
Arts, Entertainment, Accommodations	4,926	3,863	18	12	-6
Construction	2,228	1,263	8	4	-4
Education and Health Care Services	4,427	8,203	17	26	10
Finance, Insurance, and Real Estate	1,346	1,491	5	5	0
Information	436	680	2	2	1
Manufacturing	2,724	3,917	10	12	2
Other Services	875	1,160	3	4	0
Professional, Scientific, Management Services	1,724	1,515	6	5	-2

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Public Administration	0	0	0	0	0
Retail Trade	3,431	4,141	13	13	0
Transportation and Warehousing	723	496	3	2	-1
Wholesale Trade	1,110	1,241	4	4	0
Total	24,824	29,290	--	--	--

Table 39 - Business Activity

Data 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)
Source:

Labor Force

Total Population in the Civilian Labor Force	42,149
Civilian Employed Population 16 years and over	40,215
Unemployment Rate	4.63
Unemployment Rate for Ages 16-24	15.94
Unemployment Rate for Ages 25-65	2.83

Table 40 - Labor Force

Data 2016-2020 ACS
Source:

Occupations by Sector	Number of People
Management, business and financial	8,100
Farming, fisheries and forestry occupations	1,345
Service	5,005
Sales and office	8,475
Construction, extraction, maintenance and repair	5,225
Production, transportation and material moving	2,480

Table 41 – Occupations by Sector

Data 2016-2020 ACS
Source:

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	33,666	88%
30-59 Minutes	3,900	10%
60 or More Minutes	827	2%
<i>Total</i>	<i>38,393</i>	<i>100%</i>

Table 42 - Travel Time

Data 2016-2020 ACS
Source:

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate			
High school graduate (includes equivalency)			
Some college or Associate's degree			
Bachelor's degree or higher			

Table 43 - Educational Attainment by Employment Status

Data 2016-2020 ACS
Source:

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade					
9th to 12th grade, no diploma					
High school graduate, GED, or alternative					
Some college, no degree					
Associate's degree					
Bachelor's degree					
Graduate or professional degree					

Table 44 - Educational Attainment by Age

Data 2016-2020 ACS
Source:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	
High school graduate (includes equivalency)	
Some college or Associate's degree	
Bachelor's degree	
Graduate or professional degree	

Table 45 – Median Earnings in the Past 12 Months

Data 2016-2020 ACS
Source:

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on jobs available, education and health care services are the top business activities, followed by Arts/Entertainment/Accommodations. Construction also continues to be dependable provider of local job opportunities. With Texas A&M University, the TAMUS RELLIS campus, Blinn College and the Bryan and College Station Independent Schools, education is clearly the top employer. Arts, entertainment and accommodations are logically large employers due to the number of conferences, sporting events, and other related events. The local MSA has also become a regional health care destination with two large hospital systems, CHI St. Joseph, and Baylor Scott and White continuing to expand in the community. Over the recent few years, various manufacturing ventures have either relocated to, or been launched in Bryan.

Describe the workforce and infrastructure needs of the business community:

Bryan is a well-educated community, given its proximity to excellent educational institutions. Well over half the local population has some college or a college degree or higher education levels. Consultation and public input during the Consolidated Plan process indicated that other training and education for skilled labor jobs is a need. This need is being addressed in part by the local public school technical training programs, Blinn College, and the new Texas A&M University System's RELLIS Campus. However, many employers have to provide "in-house" training, as reported by the local Workforce Commission. Infrastructure, transportation investments, and continued job training are current needs. As Bryan grows, transportation infrastructure improvements are also needed. Consultations noted that public bus routes are long and inefficient. Improved public transit options would benefit low-wage workers commuting to newly created employment opportunities across the community.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The City of Bryan has worked to cultivate economic development assets such as Texas Triangle Park, a 1,000-acre plus rail-served industrial property in northeast Bryan which is designated a Foreign Trade Zone, the Lake Walk Town Center master-planned corporate campus development, and has invested heavily in its vibrant downtown area, including a new railroad quiet zone that has spurred significant planned new development in the central city, including a planned 130-room hotel. These factors create a highly positive environment for employment. The largest job driver in the area is Texas A&M University. In fiscal year 2021-22, Texas A&M's overall economic impact of \$20.8 billion statewide, supported approximately one in every four jobs locally. The Texas A&M University's RELLIS (Research, Education, Learning, Logistics, Innovation, and Security) began as Bryan Army Air Field in 1942 as a 2,300-acre pilot training facility in the cotton fields adjacent to the Brazos River. Now, this repurposed facility is a job training, education, and testing ground for technology, from drones and autonomous vehicles to a planned hypersonic wind tunnel, data center, and up to five package nuclear reactors. A new semiconductor manufacturing and research facility is in the planning stages. These projects will ensure RELLIS will be a significant catalyst for additional investment and draw skilled workers to the area. Also, the Texas A&M Health Science Center (Now Texas A&M Health) was established on the west side of Bryan in 1999, and has become a hub for training healthcare providers, caregivers, and researchers with schools of medicine,

nursing, dentistry, pharmacy, public health, and biomedical science. Graduates of these programs help to fill jobs in the region's growing healthcare industry.

Blinn College is a significant job training provider partnering with the Texas A&M University System's RELIS Agricultural and Workforce Education Complex, educating Blinn students in: electrical, plumbing, HVAC, welding, phlebotomy, and CNC machining.

Bryan ISD also provides academic and technical training. BISD's Health Sciences Academy offers certifications in EMT, EKG as well as Medical Office Technology and Medical Coding and Billing. These continued enhancements support continued economic opportunities in Bryan.

Opportunity Zones were established in the 2017 Tax Cuts and Jobs Act which provide significant benefits to investors. Brazos County is home to ten Opportunity Zones, with five located in low-income census tracts in the City of Bryan.

A major threat to attracting future businesses and job growth is the availability of groundwater resources. There is significant recent concern of over-pumping from the area's Simsboro Aquifer, as the local region faces pressure from outside entities seeking to extract, pipe, and sell up to a hundred thousand acre-feet annually to other regions of the state experiencing drought and water insecurity from failing existing resources. The City of Bryan has undertaken legal action with other stakeholders in the area to protect the aquifer. Over-pumping could result in higher drilling costs and utility rates, cause environmental issues such as salt intrusion and reduced discharge to rivers, and limit future economic development.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

According to the jobs data, the current workforce is well-fitted to employment opportunities in Bryan and the surrounding community, although consultations and public input indicate a need for additional technical skills training and education, with many local jobs requiring technical skills certifications or post-secondary education.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Blinn College is a significant job training provider partnering with the Texas A&M University System's RELIS Agricultural and Workforce Education Complex, educating Blinn students in: electrical, plumbing, HVAC, welding, phlebotomy, and CNC machining.

Bryan ISD also provides academic and technical training. BISD's Health Sciences Academy offers certifications in EMT, EKG as well as Medical Office Technology and Medical Coding and Billing. These continued enhancements support continued economic opportunities in Bryan.

Workforce Solutions of the Brazos Valley (WSBV) hosts a variety of programs and services to facilitate workforce training, including:

- Adult Education & Literacy: WSBV became the grantee for the local adult education and literacy funding. GED, English language acquisition, and English language civics are provided in each county to various populations 17 years and older. Classes are provided in Certified Nurse Aid, Intuit Staff Accountant, GED, ESL, Workforce/Job Training, and Math Help, and career training programs for adults that equip them with skills that lead to jobs paying a family-sustaining wage.
- Apprenticeship Training combines supervised on-the-job training with job-related, classroom instruction and paid on-the-job training.
- Child Care Services assistance in identifying affordable child care and scholarships for low-income parents or guardians seeking employment or working at least 25 hours a week.
- Choices, an employment services program associated with the Temporary Assistance to Needy Families (TANF) program
- SNAP E&T to help SNAP recipients in obtaining employment through participation in allowable job search, training, education, or workfare activities that promote self-sufficiency.
- Texas Internship Challenge linking student interns with employers.
- Trade Adjustment Act program for workers negatively impacted by production shifts or imports.
- Unemployment Insurance for those who lost employment
- Veteran Services, including career planning, case management, and job search assistance
- Workforce Innovation & Opportunity Act provides workforce development to low-income adults, youth, and dislocated workers.
- Helping Youth Prepare for Employment (HYPE) career expo event for high school juniors and seniors to connect with potential employers after high school.

These workforce training initiatives support the City's Consolidated Plan through the development of a well-educated and skilled workforce. This provides suitable living environments through increased business activity and increased household incomes locally. These efforts support opportunities for increased homeownership.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes. The Brazos Valley Council of Governments (BVCOG) 2021-26 Comprehensive Economic Development Strategy is a long-term economic development strategy that is regionally-driven and locally-based. It utilizes an analysis of the 7-county region's strengths and weaknesses to guide future economic growth, spur development, increase jobs and diversify the economy.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Bryan has many small businesses which employ a significant number of residents in fields such as retail, hospitality, administrative services, and skilled trades. Many employees of small businesses are low to moderate income. Toward that end, the City of Bryan has proposed a small business CDBG Economic Development program to create and retain LMI jobs. Additionally, the City has partnered with the Small Business Development Center (SBDC) to provide a series of educational workshops designed to provide

small business training, advising, and resources to help small businesses in Bryan start, grow, expand and succeed.

Discussion

The City of Bryan, through its Economic and Community Development Departments, coordinates efforts with the Bryan Business Council to expand economic opportunities and job creation in Bryan. Utilizing performance-based Chapter 380 Economic Development Agreements and coordination with the Research Valley Partnership, business have located and created a growing number of jobs locally, including CertainTeed, Top Golf, Schulman's Movie Bowl Grille, Strategic Armory Corps, Capital farm Credit, Fujifilm Diosynth Biotechnologies, Axis Pipe and Tube, and many others providing needed services and jobs in the community. The City has cultivated economic development assets such as Texas Triangle Park, a 1,000-acre plus rail-served industrial property, the Lake Walk Town Center master-planned corporate campus, downtown property assembly and infrastructure, and collaborates closely with the TAMUS RELLIS Campus and Texas A&M Health. These investments and collaborations catalyze a thriving employment environment with countless benefits to the local area which are particularly reflected in the housing and job markets.

Availability of groundwater resources is seen as a major future threat to attracting future businesses and job growth. There is significant recent concern of over-pumping from the area's Simsboro Aquifer, as the local region faces pressure from outside entities seeking to extract, pipe, and sell up to a hundred thousand acre-feet annually to other regions of the state experiencing drought and water insecurity from failing existing resources. The City of Bryan has undertaken legal action with other stakeholders in the area to protect the aquifer. Over-pumping could result in higher drilling costs and utility rates, cause environmental issues such as salt intrusion and reduced discharge to rivers, and limit future economic development.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Housing problems, as defined by the U.S. Census Bureau's CHAS data, are dispersed throughout Bryan. An area with a housing problem concentration is defined as a census tract where the number of households with any of the four severe housing problems exceeds 51 percent of the total number of households in the census tract. Following are maps, by household income, that identify census tracts with concentrations of households experiencing severe housing problems for low-income and extremely low-income households.

As indicated in the Needs Assessment, housing cost burden is the most frequent cause of housing problems in Bryan. While higher numbers of substandard units do occur in the lower-income census tracts the 2020 Housing Condition Survey demonstrated that substandard housing is found citywide. Because of this wide disbursement of substandard units, the City has determined to make its various housing programs available citywide. See the following Housing Cost Burden and Substandard Housing Distribution maps.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

The definition of "Area of Minority Concentration" (AMC) according to HUD is a census tract, where the percentage of minority residents is significantly higher than the overall percentage of minorities in the broader housing market area (HMA). Specifically, it is defined as a census tract where the percentage of persons of a particular racial or ethnic minority is at least 20 percentage points higher than the percentage of that minority group in the HMA. Alternatively, it can be defined as a census tract where the total percentage of minority residents is 20 percentage points higher than the total percentage of minorities in the HMA. The HMA is the geographic region from which residents are likely to be drawn for a particular housing project, usually the MSA. The purpose of this definition to understand patterns of residential segregation and to promote fair housing. HUD considers whether proposed housing projects are located in AMCs and whether they will lead to more inclusive and integrated housing. In the 2020 Census, the City of Bryan had overall race/ethnic concentrations of 37% white alone, 16% black, 40% Hispanic, 2% Asian, and 5% two or more races.

Census Tract 2.03 is designated an AMC. According to the 2020 Census, there are 26.84% Hispanic or Latino, and a total minority concentration of 46.2%. This tract is located in west Bryan along Harvey Mitchel Parkway.

Census Tract 2.04 is designated an AMC. According to the 2020 Census, there are 29.33% Black or African American (alone), non-Hispanic and 37.31% Hispanic or Latino, and a total minority concentration of 74.2%. This tract is located in central Bryan, and is bisected by Villa Maria Road.

Census Tract 2.06 is designated an AMC. According to the 2020 Census, there is a total minority concentration of 54.77%. This tract is located in west Bryan along John Sharp Parkway.

Census Tract 3.01 is designated an AMC. According to the 2020 Census, there are 28.29% Black or African American (alone), non-Hispanic and 52.33% Hispanic or Latino, and a total minority concentration of 80.72%. This tract is located in north Bryan at the northernmost city limit.

Census Tract 3.02 is designated an AMC. According to the 2020 Census, there are 55.24% Hispanic or Latino, and a total minority concentration of 65.72%. This tract is located in north east Bryan just south of tract 3.01.

Census Tract 4.01 is designated an AMC. According to the 2020 Census, there are 39.1% Black or African American (alone), non-Hispanic and 40.75% Hispanic or Latino, and a total minority concentration of 82.2%. This tract is located in east central Bryan just south of tract 3.02, and is bisected by East Martin Luther King Street.

Census Tract 4.02 is designated an AMC. According to the 2020 Census, there are 23.45 Black or African American (alone), non-Hispanic and 42.01% Hispanic or Latino, and a total minority concentration of 67.47%. This tract is located in east Bryan just south of tract 4.01.

Census Tract 5.01 is designated an AMC. According to the 2020 Census, there are 42.51 Black or African American (alone), non-Hispanic 43.78% Hispanic or Latino, and a total minority concentration of 91.14%. This tract is located in central Bryan just north of central downtown.

Census Tract 5.2 is designated an AMC. According to the 2020 Census, there are 82.18% Hispanic or Latino, and a total minority concentration of 98.31%. This tract is located in central Bryan just north of central downtown.

Census Tract 6.03 is designated an AMC. According to the 2020 Census, there are 64.37% Hispanic or Latino, and a total minority concentration of 86.07%. This tract is located in west central Bryan.

Census Tract 6.05 is designated an AMC. According to the 2020 Census, there are 68.19% Hispanic or Latino, and a total minority concentration of 89.03%. This tract is located in west Bryan, west of tract 6.06

Census Tract 6.06 is designated an AMC. According to the 2020 Census, there are 82.56% Hispanic or Latino, and a total minority concentration of 91%. This tract is located in central Bryan, bisected by Groesbeck Street.

Census Tract 7.0 is designated an AMC. According to the 2020 Census, there are 55.24% Hispanic or Latino, and a total minority concentration of 69.92%. This tract is located in central Bryan north of Highway 21.

See the following HUD CPD maps for areas of low to moderate income concentration.

What are the characteristics of the market in these areas/neighborhoods?

Residential dwellings in these areas typically consist of older homes developed in the 1940s and 1950s. They are generally more modest quality of construction and often less well maintained, leading to

deteriorating conditions which affect the health and safety of families residing in the homes. Newer developed homes are scattered throughout these neighborhoods, sometimes developed by local CHDOs, or other non-profit developers like Habitat for Humanity and now more frequently for-profit developers of infill housing. Other new affordable homes are sometimes built by the City's grant funded housing programs.

Are there any community assets in these areas/neighborhoods?

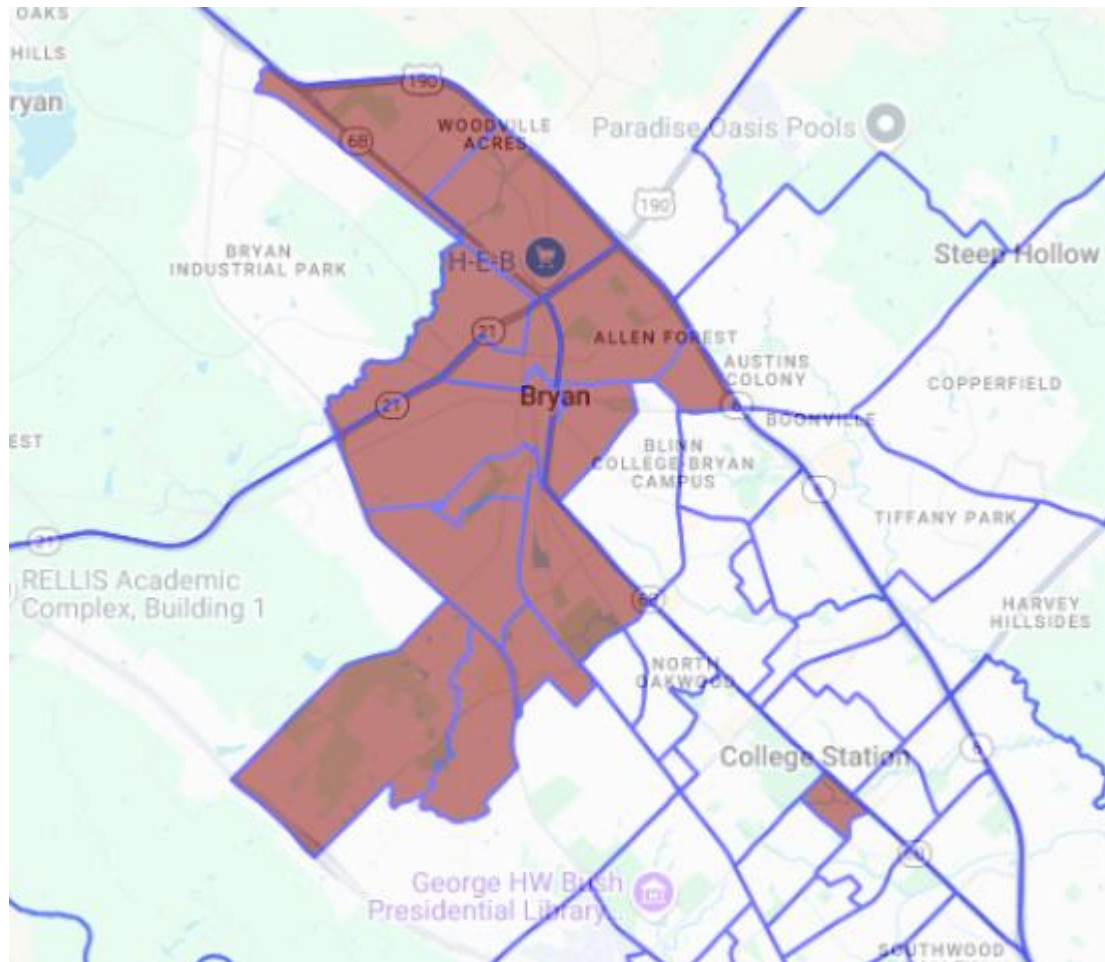
There are many very active neighborhood associations that are involved in community issues and concerns. As mentioned above, affordable, accessible and energy efficient homes are developed by local CHDOs, other non-profit developers, Habitat for Humanity, and by the City's housing programs. These developments have also encouraged other for-profit developers to invest in these neighborhoods. The City is also actively involved in upgrades and improvements to infrastructure in these neighborhoods, and also prioritizes code enforcement activities so as to address slum and blighting influences. Other community assets include 51 parks and 40 miles of walking trails, and facilities ranging from archery ranges to skateboard parks. Collectively, these proactive efforts have promoted redevelopment, resulting in an improved quality of life for citizens.

Are there other strategic opportunities in any of these areas?

In addition to the above mentioned CDBG, HOME, and private sector enhancements in these areas, the City and local private sector investments are revitalizing Bryan's lower income neighborhoods utilizing local, federal, public and private resources. The City actively looks for infill development opportunities to acquire tax-foreclosed properties and make them available for housing development. the City's federal program funds are utilized to develop and incentivize affordable housing directly, and through its nonprofit housing development partners, including Elder Aid and Habitat for Humanity. Additionally, the City works in partnership with local banks and developers to encourage affordable housing development throughout the City by leveraging federal funds, down payment assistance, technical assistance, and donated surplus land, such as the recently-completed 54-home development at Hope's Crossing.

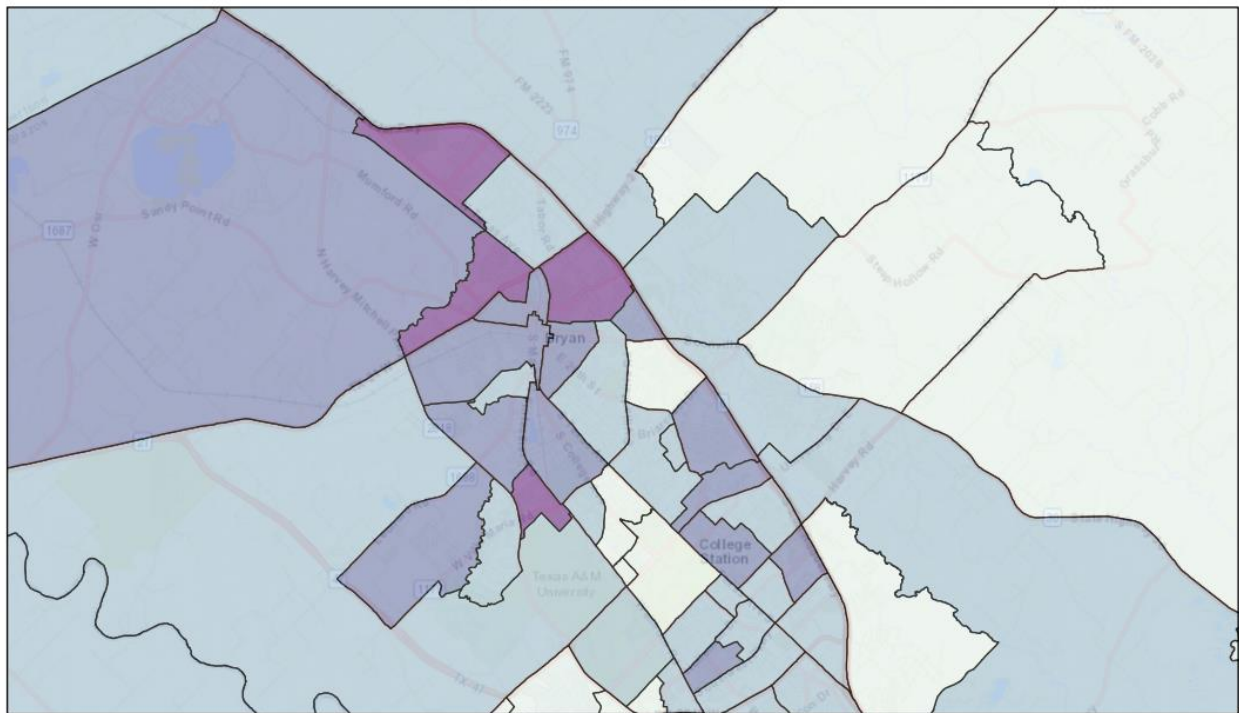
Maps:

Areas of Minority Concentration



Source: HUD Mapping Application, <https://www.huduser.gov/portal/maps/rad/home.html>

Black Alone Non-Hispanic -

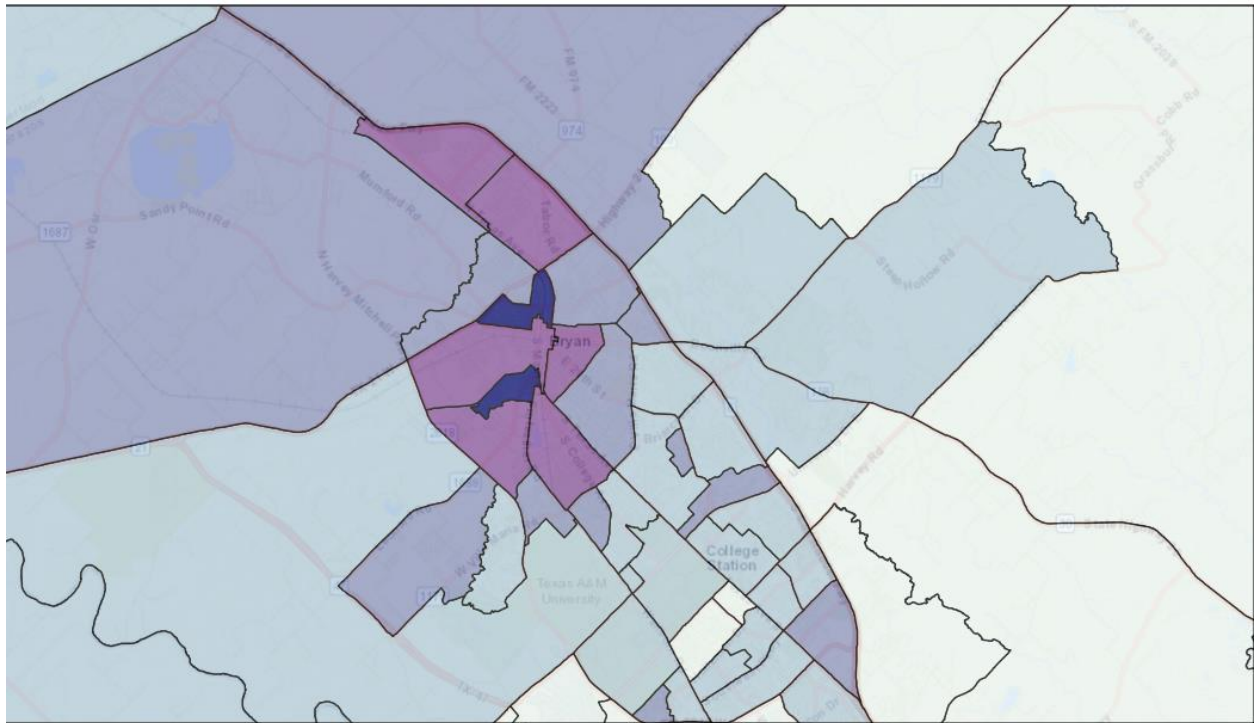


June 1, 2025

BlackAfricanAmericanAlone 4.89-13.33% 27.82-53.08%
0-4.89% 13.33-27.82%

1:131,015
0 1 2 4 mi
0 1.5 3 6 km
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Hispanic Origin -



June 1, 2025

HispanicOrigin

13.22-28.18%	47.80-71.50%
0-13.22%	28.18-47.80%
	>71.50%

1:131,015

0 1 2 4 mi

0 1.5 3 6 km

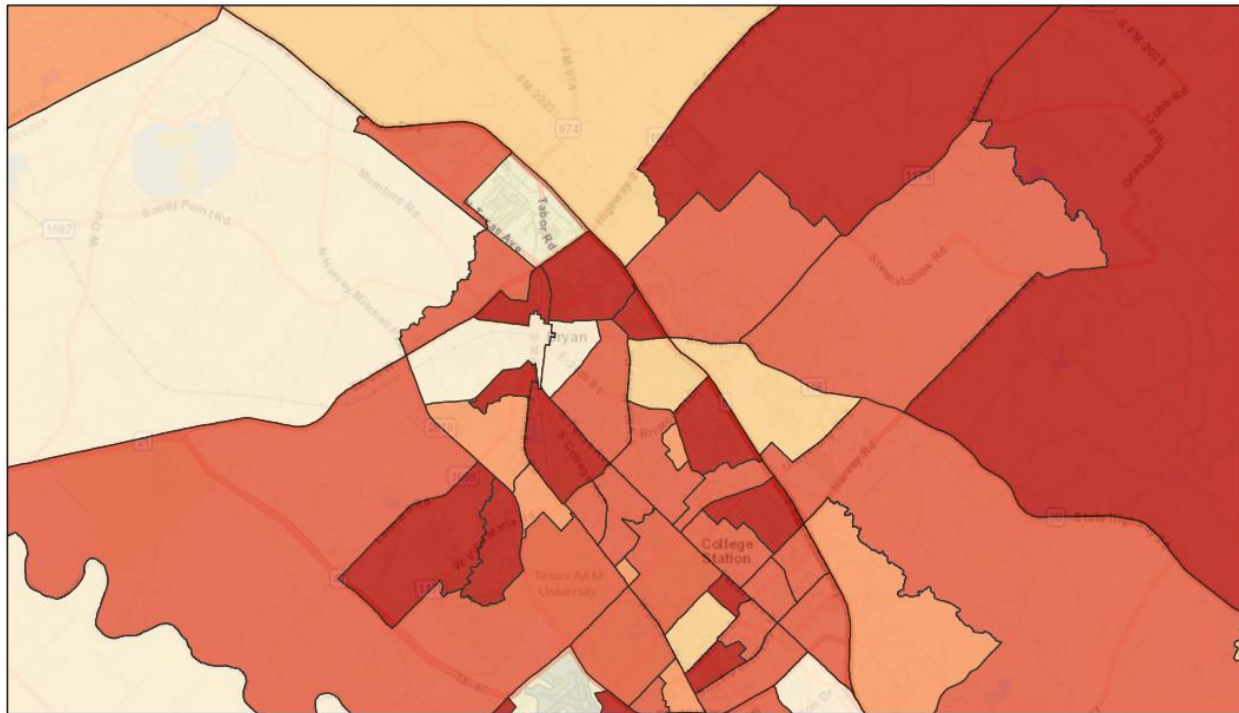
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

The map displays the proposed 11th Congressional District in yellow. Key features include Sandy Point Rd, W. Oglethorpe Rd, and the Texas A&M University area. The district is surrounded by areas colored in shades of purple and blue, representing other districts. Major roads like I-75 and I-40 are visible, along with landmarks like the Texas A&M University campus.

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

OMB Control No: 2506-0117 (exp. 09/30/2021)

ELI HH with Any of 4 Severe Housing Problems -



June 1, 2025

ELIHHWithHousingProblems

0-39.29%	39.29-57.46%	57.46-72.31%	72.31-86.84%	>86.84%
----------	--------------	--------------	--------------	---------

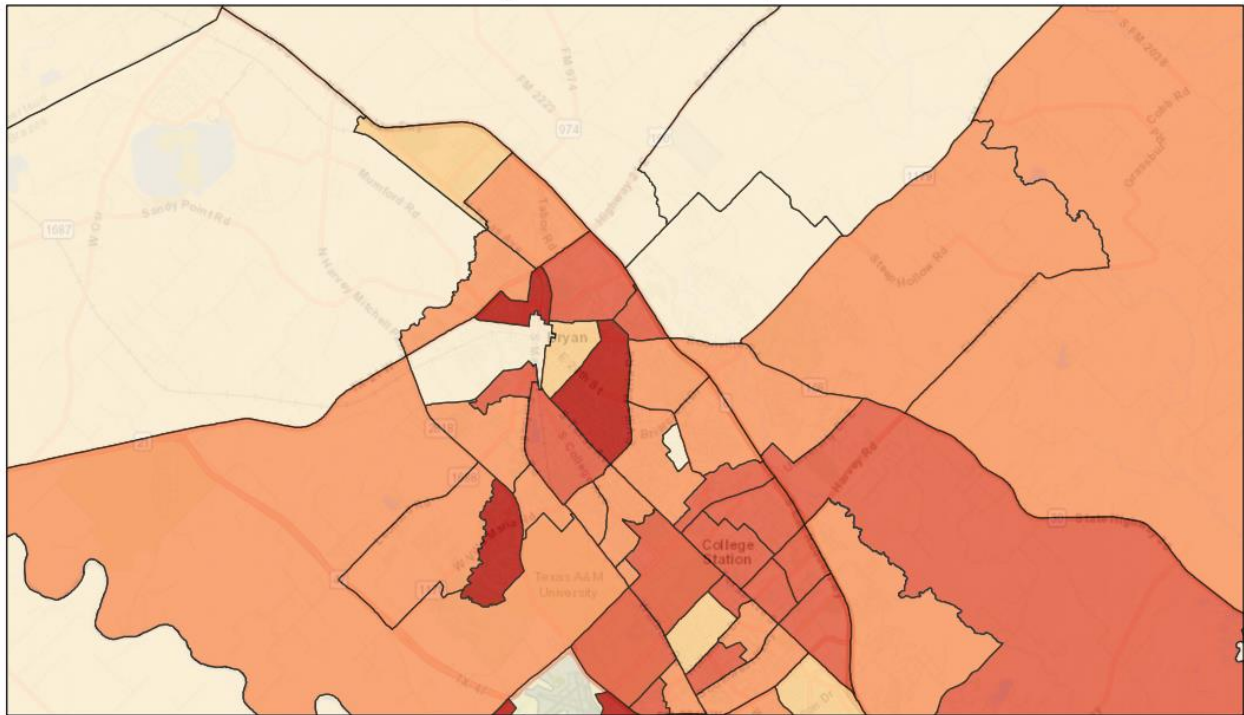
1:131,015

0 1 2 4 mi

0 1.5 3 6 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Pct of LI HH Any of 4 Severe Housing Problems -



June 1, 2025

LIHHWithHousingProblems

38.54-53.93%	67.07-80.70%
0-38.54%	53.93-67.07%
	>80.70%

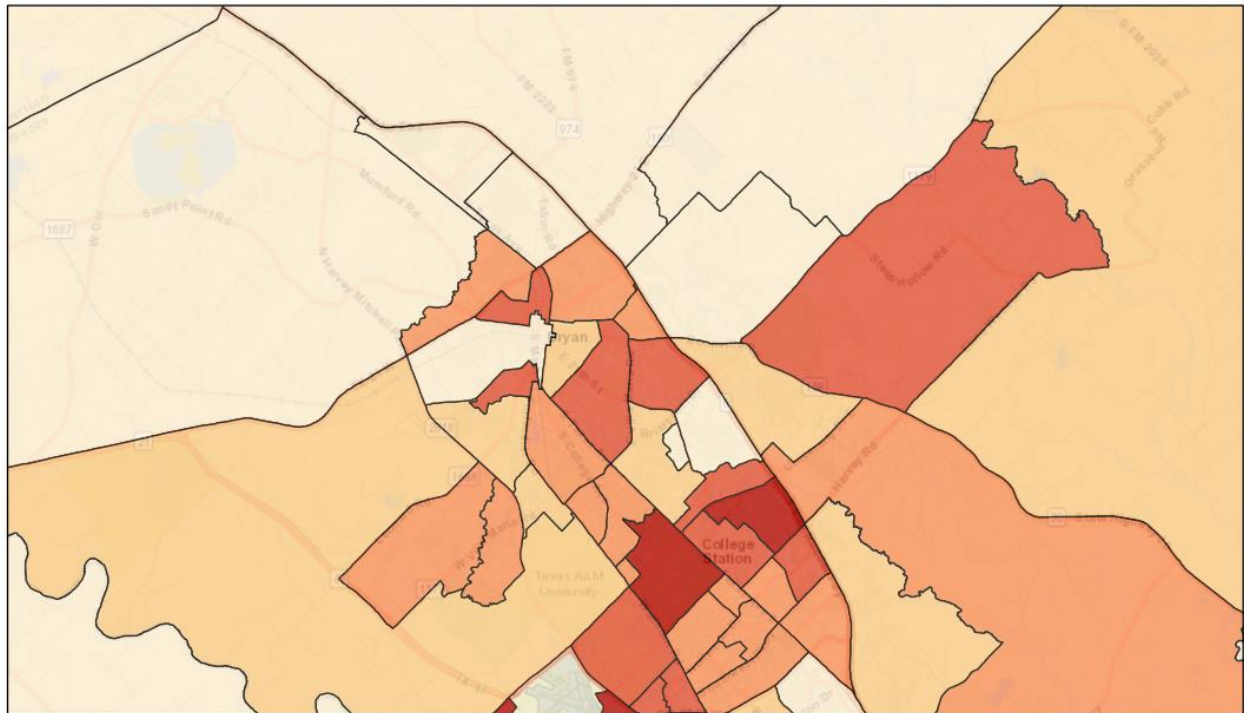
1:131,015

0 1 2 4 mi

0 1.5 3 6 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

MI HH with Any of 4 Severe Housing Problems -



June 1, 2025

MIHHWithHousingProblems

0-30.19%	30.19-43.14%	43.14-54.70%	54.70-67.39%	>67.39%
----------	--------------	--------------	--------------	---------

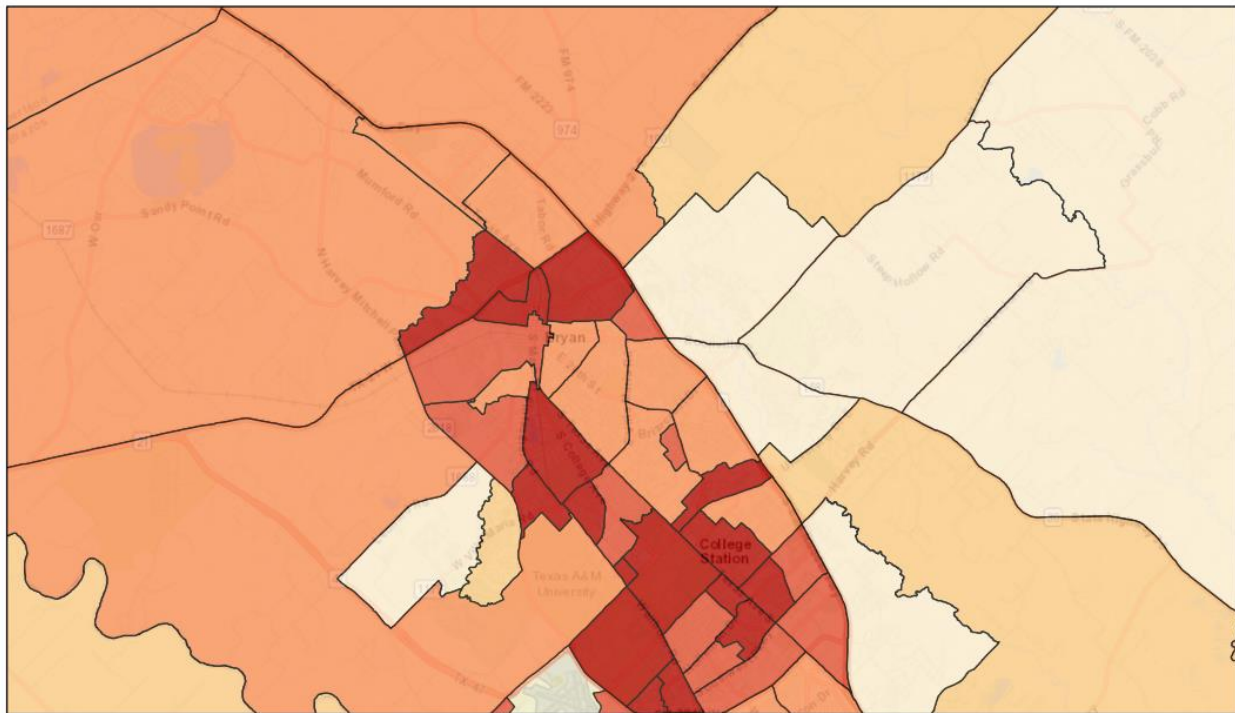
1:131,015

0 1 2 4 mi

0 1.5 3 6 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Pct Moderate Income Households -



June 1, 2025

ModIncomeHouseholds

0-25.37%	25.37-39.40%	53.82-70.16%
	39.40-53.82%	>70.16%

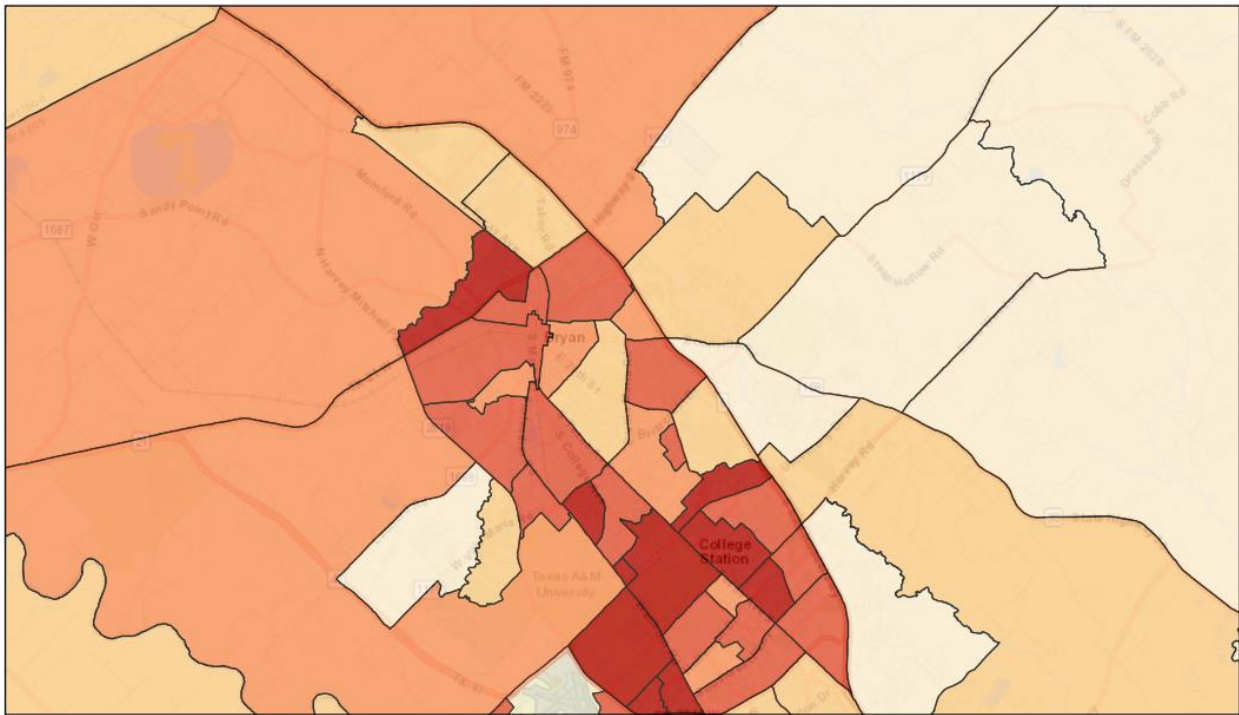
1:131,015

0 1 2 4 mi

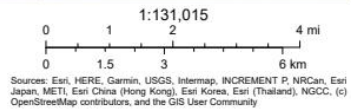
0 1.5 3 6 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

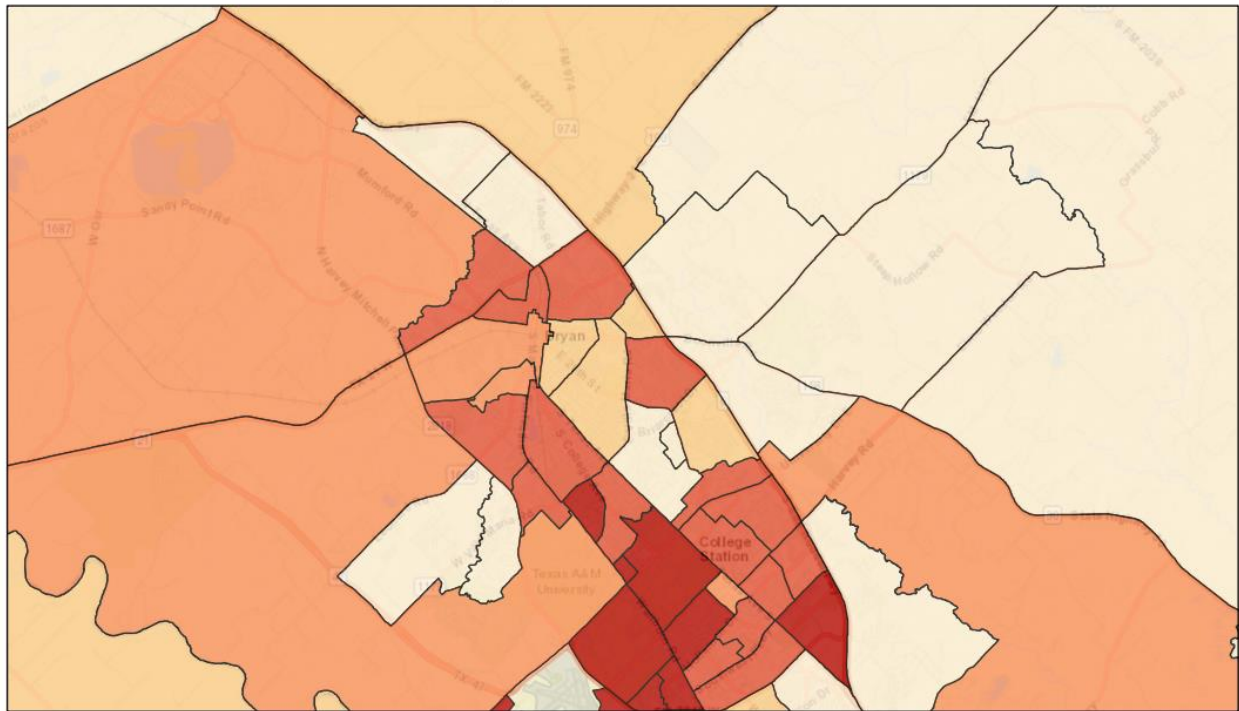
Pct Low Income Households -



June 1, 2025



Extremely Low Income Households -



June 1, 2025

ExtremelyLowIncomeHouseholds

0-8.47%	8.47-15.77%	25.18-38.75%
	15.77-25.18%	>38.75%

1:131,015

0 1 2 4 mi

0 1.5 3 6 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Poverty Rate -



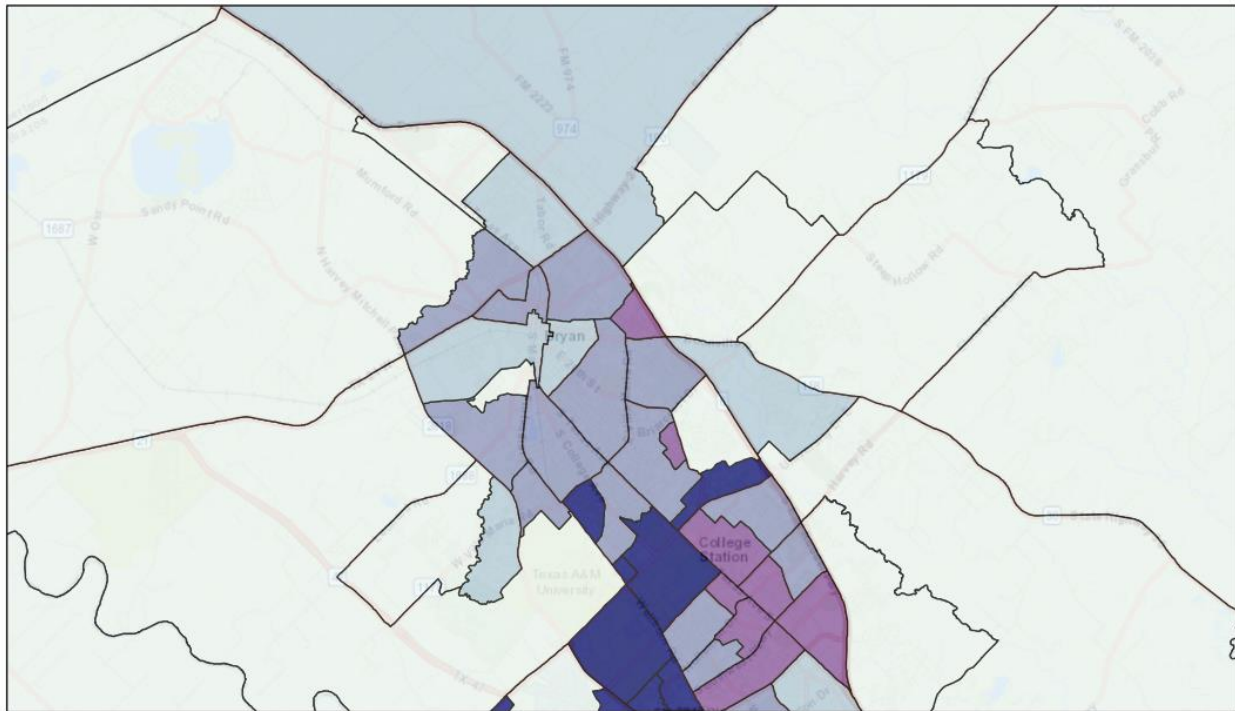
June 1, 2025

PovertyRate

0-9.21% Poverty 9.21-17.64% Poverty 17.64-28.17% Poverty 28.17-43.06% Poverty >43.06% Poverty

1:131,015
0 1 2 4 mi
0 1.5 3 6 km
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Housing Cost Burden -



June 1, 2025

HousingCostBurden

0-29.28% Paying>30%

29.28-38.78% Paying>30%

38.78-47.69% Paying>30%

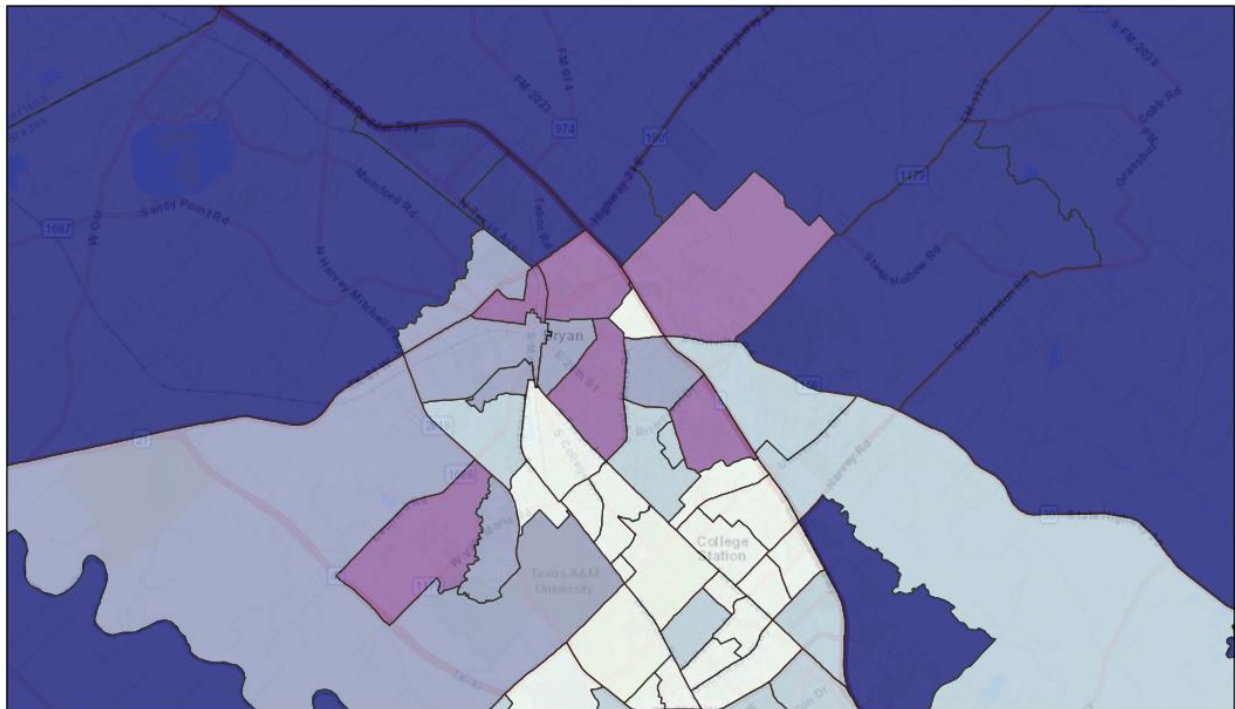
47.69-58.44% Paying>30%

>58.44% Paying>30%

1:131,015
0 1 2 4 mi
0 1.5 3 6 km

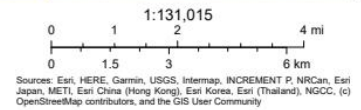
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Pct Owner Occupied Housing -



June 1, 2025

OwnerOccupiedHousing



MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The City of Bryan has multiple broadband providers. The FCC National Broadband Map indicates 100% coverage in the City of Bryan. With regards to connectivity, particularly for lower-income households in Bryan, it is noted that while some lower-income households may not have internet service connection to a dwelling, the majority have cell phones and data plans allowing to access the internet. Those households generally have the ability to use cell phones as “mobile-hotspots” to access the internet using a laptop or other device. Based on a *Pew Research Center* study, interaction with clients, and other industry data, it’s presumed that many of the low-income households lacking internet service or cellphones are senior citizens who are not interested in utilizing computers for internet service. To further assist households with students, the Bryan Independent School District (BISD) provides WIFI service for those near their various campuses. BISD has also acquired mobile-hotspot locations throughout Bryan and are in the process of partnering on the implementation of LTE towers to further increase their broadband access throughout the community. A local public service agency, *Project Unity*, also assists with households, particularly those with children, who are unable to pay monthly internet bills. Due to its many college students, Bryan has numerous diners and coffee shops that also provide internet access to their customers. Through its public library system, the City also ensures internet access to residents by providing personal computers connected to internet service.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

According to *BroadbandNow*, there are 15 internet providers in Bryan, with plans starting at \$29.99 per month, affordable to most households. The Federal Communications Commission map shows internet coverage for Texas. Bryan is located, is shown to have the one of the highest coverage rates for its citizens, confirming high service coverage for those with home broadband connections. Alternatively, access is available through Bryan ISD provided WIFI service, Bryan Library computer and internet access, local beverage or food shops, or by local public service agencies provided assistance in paying for home internet access. Online and public meeting surveys received in preparation for the 2025-29 Consolidated Plan showed approximately 84.62% of respondents had broadband service at their residence, and 38.46% reported that internet service in their neighborhoods was sometimes a problem. As data show high levels of local availability and affordable internet plans, it’s presumed that reports of service being problematic is related to quality of service.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The most likely natural hazard threatening the jurisdiction, particularly lower-income households, is flooding due to storms, mainly from tropical systems originating in Caribbean and/or Gulf of Mexico. The City of Bryan has many flood-prone areas, and has invested considerably in stormwater management infrastructure. If the frequency or intensity of such tropical weather were to increase, flooding and loss of power would affect the entire region and would be particularly impactful to lower-income households. Such weather events have typically caused flooding, loss of power, fallen trees, damage to structures, resource depletion from evacuations of coastal residents, and other effects that threaten the public, to include food and water supply shortages and difficulty navigating streets due to flooding, downed power lines, and other debris.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

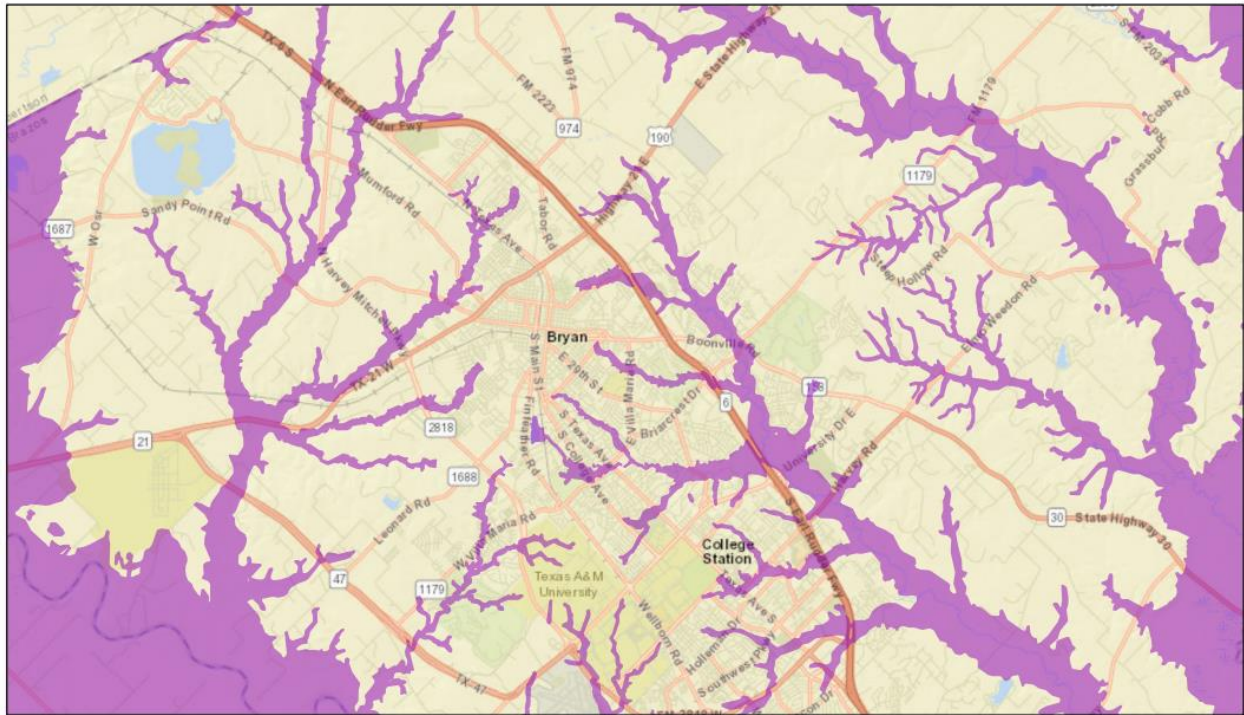
Because lower-income households have fewer financial resources, often live in marginal housing, and are more likely to live in structures in flood prone areas, they are more vulnerable to the effects of natural disasters. These households often reside in older, poorly built and maintained structures. The City's CDBG and HOME housing program staff often find that grant program applicants residing in or near flood zones have limited opportunities for flood hazard mitigation.

Lower-income households in several areas of Bryan are more likely to be at risk of flooding during heavy tropical storms or other severe weather events. Those census tracts with more than 50% of low- and moderate-income households, and near flood prone areas are: northeast Bryan near the Coulter Field Airport and along Carters Creek.; Briar, Burton, and Carter Creeks in southeastern Bryan; north of downtown and along Still Creek and its tributary; west and southwest Bryan along Turkey Creek and its tributary, west of downtown Bryan and along Cottonwood Creek and its tributary; and north and northwest Bryan along Thompson Creek, Thompson Branch, and their tributaries.

As noted above, such weather events have occurred in Bryan in the past resulting in power outages, downed trees, building damage, and street closures due to flooding and debris.

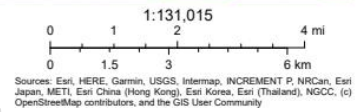
Following is a City of Bryan FEMA Flood Zone and Topography Map illustrating the flood prone locations noted above:

FEMA 100-Year Flood Zones -



June 1, 2025

100 Year Q3 flood zone



Source: HUD CPD Maps <https://egis.hud.gov/cpdmaps/>

Strategic Plan

SP-05 Overview

Strategic Plan Overview

This section provides the framework for the goals to be addressed using federal grant funds and other resources over the next five years through the 2025-2029 Consolidated Plan. It explains the various factors considered in setting these goals, including geographic priorities (SP-10), priority needs identified through HUD's Assessment of Fair Housing contributing factors (SP-25), and market influences on housing development (SP-30).

Additionally, the section outlines the City's and its partners' responsibilities to comply with federal statutes affecting grant-funded projects, such as lead-based paint mitigation (SP-65), removing barriers to housing under the Fair Housing Act (SP-55), and ensuring proper monitoring for responsible stewardship of federal, state, and local funds (SP-65).

The Plan also connects grant-funded or leveraged projects to broader initiatives, including the City's homelessness strategies (SP-60) and poverty reduction programs (SP-70). Overall, the Strategic Plan serves as a guide for what the City aims to accomplish with federal grants over five years, while annual Action Plans provide detailed, year-by-year outlines of specific activities and funding allocations aligned with these long-term goals.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

1	Area Name:	City Wide
	Area Type:	All inclusive types within city limits.
	Other Target Area Description:	All inclusive types within city limits.
	HUD Approval Date:	
	% of Low/Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	There are no designated target areas within the City. CDBG / HOME projects and investments are allocated on a city-wide basis addressing housing, facilities, services, and infrastructure based on individual income eligibility and/or LMI area characteristics.
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

Table 46 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Bryan does not allocate investments geographically, but instead, makes all housing activities available on a citywide basis and allocates public facility, park, and infrastructure improvements based on

LMI areas and service boundary areas. CDBG and HOME funds are distributed throughout the community based on need. Because low-income, elderly, disabled, and special needs homeowners and renters reside throughout the city, housing assistance is available citywide. Homeless persons and those facing potential homelessness also reside throughout the city making the need for shelter and housing a citywide activity. Services provided for the homeless population are located citywide to provide maximum accessibility.

In an effort to promote livability - public services, public facilities and housing projects are generally located so as to be accessible by various modes of transportation (walking, biking, driving) and are typically on or near public bus routes provided by the local transit authority as well as Texas A&M University's off-campus bus service. Major employment assistance providers like Blinn College and the Workforce Commission are located on both, the Transit District's and Texas A&M University's off-campus bus routes (see attached maps).

Assistance for special needs populations (elderly people, disabled persons, persons with drug/alcohol addictions, persons with AIDS/HIV) is provided citywide, as these populations exist throughout the city. Public services are also not limited geographically. These services are expected to be readily available and accessible to targeted clients.

Public facilities and infrastructure improvements such as park improvements, will be considered in areas of the city where 51% or more of the population meets low and moderate-income guidelines (within defined service boundary area) or where an organization's clients are at least 51% low to moderate income as defined by HUD. Community Development staff are also involved in the City of Bryan's Infill Development initiatives and are involved in the CIP projects to ensure livability issues are being considered. Economic development activities are provided citywide (unless designated a spot slum/blighted location), recognizing that low-income individuals live throughout the city and that business location is often critical to its potential success.

The City of Bryan does not receive HOPWA or ESG funds.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

DRAFT

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents
	Geographic Areas Affected	All inclusive types within city limits.
	Associated Goals	Affordable homeownership Preserve and expanding affordable housing units Production of affordable units
	Description	This priority focuses on expanding affordable housing opportunities by supporting both homeownership and housing rehabilitation for low- and moderate-income residents. Efforts include providing technical and financial assistance to help homeowners rehabilitate and maintain their properties to safe and standard conditions, along with homebuyer education and down payment assistance to increase the number of stable homeowners. Additionally, technical support and funding may be provided to nonprofit and for-profit owners and developers to increase the overall supply of safe and affordable housing, addressing the needs of diverse populations across the community. Continue partners with existing Community Housing Development Organizations (CHDO) by providing technical assistance and/or funding to provide for the development of new affordable single-family homes to low- and moderate-income residents.
	Basis for Relative Priority	Priority based on surveys, consultations, stakeholder interviews, public hearing input, focus group meetings, and secondary data (i.e., housing market analysis and census data cost burden data).
2	Priority Need Name	Public Services
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	All inclusive types within city limits.
	Associated Goals	Expand and enhance public service programs that improve supportive services for vulnerable and low-income populations.
	Description	

	Basis for Relative Priority	Priority based on surveys, consultations, stakeholder interviews, public hearing input, focus group meetings, and secondary data (i.e., housing market analysis and census data cost burden data).
3	Priority Need Name	Economic Development
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	All inclusive types within city limits.
	Associated Goals	Support small business development to create and retain jobs, fostering economic growth.
	Description	
	Basis for Relative Priority	Priority based on surveys, consultations, stakeholder interviews, public hearing input, focus group meetings, and secondary data (i.e., housing market analysis and census data cost burden data).
4	Priority Need Name	Clearance & Demolition
	Priority Level	Low
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	All inclusive types within city limits.
	Associated Goals	Remove substandard and unsafe structures to eliminate blight, improve neighborhood safety, and support future redevelopment opportunities.
	Description	Provide technical and/or funding assistance for projects and programs addressing and eliminating slum and blight influences, to include: dangerous and dilapidated vacant structures, health and safety violations, and other local code violations that cause blighting and/or public health concerns.
	Basis for Relative Priority	Priority based on surveys, consultations, stakeholder interviews, public hearing input, focus group meetings, and secondary data (i.e., housing market analysis and census data cost burden data).
5	Priority Need Name	Public Facilities
	Priority Level	Low
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	All inclusive types within city limits.
	Associated Goals	Support the development, rehabilitation, and accessibility of public facilities that serve low- and moderate-income residents
	Description	
	Basis for Relative Priority	Priority based on surveys, consultations, stakeholder's interviews, public meetings, homeless coalition meetings, provider focus groups, client focus groups, and secondary data (including housing analysis, Housing Point in Time Count/Analysis, American Community Survey, United Way 211 data, Texas A&M Rural Public Health survey).
	Basis for Relative Priority	
6	Priority Need Name	Public Infrastructure
	Priority Level	Low

	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	All inclusive types within city limits.
	Associated Goals	Invest in infrastructure improvements such as streets, sidewalks, drainage, water and sewer lines to enhance safety, accessibility, and quality of life in low- and moderate-income neighborhoods.
	Description	
	Basis for Relative Priority	Priority based on surveys, consultations, stakeholder's interviews, public meetings, homeless coalition meetings, provider focus groups, client focus groups, and secondary data (including housing analysis, Housing Point in Time Count/Analysis, American Community Survey, United Way 211 data, Texas A&M Rural Public Health survey).
7	Priority Need Name	Program Administration
	Priority Level	High
	Population	Other
	Geographic Areas Affected	All inclusive types within city limits.
	Associated Goals	Program Administration, Grant compliance
	Description	
	Basis for Relative Priority	Priority based on surveys, consultations, stakeholder's interviews, public meetings, homeless coalition meetings, provider focus groups, client focus groups, and secondary data (Brazos Valley Coalition for the Homeless, Point in Time Count, City's Housing Analysis, American Community Survey, United Way 211 data, Texas A&M Rural Public Health survey).

Table 47 – Priority Needs Summary

Narrative (Optional)

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
New Unit Production	New affordable housing construction is influenced by several market conditions, including: availability and cost of land; construction costs; competition for higher-end developments; interest rates; and lending requirements. While interest rates remain at historic lows, newly enacted lending requirements tightened mortgage underwriting, resulting in added difficulty for lower-income buyers. Additionally, high demand locally for land and construction resources hampers development of more affordable units. Continued involvement of the City, CHDOs, the States LIHTC program, and other entities like Habitat for Humanity and other non-profit developers, will be key to ensuring the production of new affordable units.
Rehabilitation	Rehabilitation of units is also impacted by demands on construction resources and material costs. It is also influenced by property condition, title ownership, and available resources, both from the owner and agencies providing assistance. Often, units are not feasible to rehabilitate due to significant structural and/or mechanical failures. Likewise, defects in title may also preclude rehabilitation. Tax liens and other liens against a property may also make rehabilitation difficult.
Acquisition, including preservation	The current high demand for property, unimproved and improved, will drive up the cost of affordable housing development. Government and non-profit agency programs often target more difficult to develop properties - those with liens, title problems, vacant dilapidated structures so as to help eliminate slum and blight and to promote redevelopment. While development timelines are longer using these type properties, city and non-profit involvement and resources can be leveraged to make an otherwise unlikely projects feasible.

Table 48 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City of Bryan anticipates receiving Community Development Block Grant (CDBG - \$919,611) and HOME Investment Partnerships Program (HOME - \$347,844.46) grant funding from the U.S. Department of Housing and Urban Development (HUD) on an annual basis through the duration of the 2025-29 Consolidated Plan period. Annual allocations are based on a HUD-established formula. These resources, along with those from other public, private, and nonprofit partners, establish a multi-faceted approach to addressing the goals and objectives identified in this Strategic Plan.

The CDBG program provides communities with resources to address a wide range of unique community development needs by providing decent housing, a suitable living environment, and expanding economic opportunities for low- and moderate-income persons. Activities may include affordable housing services, homeownership assistance, acquisition, public facility/infrastructure improvements, clearance and demolition, public services, economic development assistance, and other grant eligible activities.

The HOME program is dedicated solely to development of affordable housing opportunities for low-income households. The City of Bryan anticipates partnering with local non-profit and for-profit entities, to promote affordable housing for low-income persons locally. At least 15% of the grant must be set-aside to fund housing to be owned, developed, or sponsored by experienced, community-driven nonprofit groups designated as Community Housing Development Organizations (CHDOs), unless the City chooses to utilize applicable waivers lifting this requirement for the 2025-26 program year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$919,611	\$40,000	0	\$959,611	\$3,838,444	Expected amount for rest of Con Plan is Year 1 x 4.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership	\$347,844.46	\$70,000	0	\$417,844.46	\$1,671,377.84	Expected amount for rest of Con Plan is Year 1 x 4.

Table 49 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal grant funds will be used to leverage additional resources through various means, including property donations from the City or other entities, contributions from nonprofit organizations such as Habitat for Humanity, and other nonprofit developers involved in the rehabilitation or construction of affordable housing. Leveraging also includes support through sweat equity, private fundraising, and in-kind resources.

The City's down payment assistance program leverages resources from local financial institutions that provide permanent mortgage financing to homebuyers. Public service agencies receiving CDBG funding also contribute private and nonprofit dollars toward service delivery, further enhancing the impact of federal investments.

Although the City has historically received a waiver for the HOME Program match requirement, no waiver has been granted yet for the current period. However, the City anticipates receiving one based on past precedent. Regardless, the City continues to monitor match requirements closely and maintains funds set aside to fulfill the match obligation, equivalent to 12.5 cents for every HOME dollar expended.

Additionally, the City contributes general funds toward improvements in parks, public facilities, and infrastructure in low- and moderate-income neighborhoods. These efforts are coordinated with the Community Development Department when appropriate, further leveraging CDBG resources to maximize community benefit.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City does not currently have available publically owned property for use of affordable housing, but the City does periodically have property donated that stipulates the property be used for affordable housing.

Discussion

The City will receive \$919,611 of CDBG (plus anticipated program income of \$40,000) and \$347,844.46 of HOME (plus anticipated program income of \$70,000). The City continues existing partnerships and seeks new ones to create additional momentum in reaching goals. Partnerships include non-profit and for-profit developers, the Home Builders Association, local housing committees, public service agencies, and the Brazos Valley Coalition for the Homeless.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Bryan	Government	Economic Development Non-homeless special needs Ownership Planning neighborhood improvements public facilities public services	Jurisdiction
Brazos Council of Governments	Regional organization	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public services	Region
Bryan Housing Authority	Public Housing	Public Housing	Jurisdiction
Brazos Valley Coalition for the Homeless	Continuum of Care	Homelessness	Region
Brazos County	Government	Economic Development Non-homeless special needs Planning Public services	Jurisdiction
BCS Habitat for Humanity	Nonprofit	Ownership	Jurisdiction
Texas A&M University	Public institution	Planning Public Services	State
BCS Chamber of Commerce	Nonprofit	Economic Development	Jurisdiction
Twin City Mission	Nonprofit	Homelessness	Jurisdiction
Elder-Aid	CHDO	Non-homeless special needs Ownership Rental	Jurisdiction
The Brazos Transit District	Regional Organization	Public Services - Transportation	Region
Brazos Valley Community Action Program	Regional Organization	Non-homeless special needs Planning public services	Region
United Way of the Brazos Valley	Regional Organization, nonprofit	Non-homeless special needs Planning public services	Region

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Bryan's Community Development Department works collaboratively with a range of public and private organizations to assess and address local housing, homelessness, and non-housing community development needs. The institutional delivery system in Bryan is well-coordinated, with strong partnerships that support service delivery across various sectors, including homeless services, housing, and special needs populations.

Key partners include public agencies, nonprofit organizations, and other community stakeholders that work with the City to conduct needs assessments, identify gaps in services, and implement programs that improve community outcomes. For instance, the City is an active member of the Community Partnership Board, a collaborative coalition of approximately 80 health and human service agencies serving the Bryan–College Station area. This network enhances coordination among service providers and strengthens the overall service delivery system.

Bryan–College Station benefits from strong public-private partnerships and active cooperation among various sectors, which enhances efforts to support low-income individuals and families on their path to stability and self-sufficiency.

Strengths of the local institutional delivery system include:

- A healthy and active real estate market
- Strong, dedicated nonprofit service providers
- Effective collaboration between city governments and public/private organizations

Identified gaps in the system include:

- A limited number of nonprofit housing developers
- Aging infrastructure in older neighborhoods
- Limited capacity of the local public transportation network
- CDBG public service funding cap, which restricts the ability to fully meet service needs
- Administrative challenges faced by some nonprofit partners in managing grant-funded programs

These strengths and gaps inform the City's strategy to enhance service coordination, support capacity building among partners, and ensure the efficient use of limited resources.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X		X
Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services	X	X	X

Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X		X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
Other			
Other			

Table 51 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The City of Bryan is an active member of the Brazos Valley Coalition for the Homeless (BVCH) and plays a significant role in the Continuum of Care (CoC) process, supporting coordinated efforts to address homelessness in the region. The City provides technical assistance to BVCH, particularly in the administration of the CoC application, compliance with the Homeless Management Information System (HMIS), annual reporting, and support for the Point in Time Count.

BVCH collaborates with a wide range of agencies, including those represented on the Community Partnership Board, a coalition of more than 80 local service organizations. These partnerships help establish and maintain referral and outreach systems for individuals experiencing or at risk of homelessness. Special attention is given to individuals transitioning from foster care, healthcare facilities, mental health institutions, and the criminal justice system, with a focus on developing discharge policies that prevent exits into homelessness.

To address employment barriers for individuals experiencing homelessness, BVCH partners with the local Workforce Board to improve access to employment programs and job readiness resources. The City of Bryan and BVCH continue to work with key housing and service providers, including Brazos Valley Community Action Programs, Project Unity, BCS Habitat for Humanity, Bryan Housing Authority, Twin City Mission, Elder Aid, Family Promise, and the Brazos Valley Council of Governments—to expand housing opportunities and supportive services for people in need.

Twin City Mission operates several important programs in the local homeless services system. The Doug Weedon Shelter of Hope provides emergency shelter and case management to approximately 1,500 clients each year. Additional beds are dedicated to permanent supportive housing for individuals who are chronically homeless, and some units are accessible for people with disabilities or families.

Twin City Mission also manages HAVEN, a 24-unit apartment complex offering rental assistance to individuals and families who have previously experienced homelessness. Phoebe's Home, part of the

Domestic Violence Services program, provides emergency shelter and nonresidential counseling to women and children affected by domestic violence.

The organization maintains a Coordinated Access System to connect individuals and families to appropriate community services. In addition, its Youth and Family Services division operates the STAR (Services to At Risk Youth) program, which offers free family support services, summer activities, and child abuse prevention education.

Together, these programs reflect a well-organized local system that addresses the complex needs of individuals and families experiencing homelessness in Bryan and the surrounding Brazos Valley area.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The City of Bryan benefits from a strong and coordinated institutional delivery system that includes experienced housing organizations, nonprofit service providers, and emerging community-based organizations. This network is supported by collaborative partnerships with public, private, and additional entities that leverage federal, state, and local resources to address housing, community development, and social service needs.

A notable strength of the delivery system is its ongoing collaboration among local agencies and its strong base of community support. Civic leaders and service providers work together to maximize impact and avoid duplication of services. Additionally, efforts to engage residents and consumers of public services in identifying needs and improving service delivery remain central to the City's approach.

Despite these strengths, resource limitations continue to pose challenges. Funding constraints are the primary factor limiting service capacity. Gaps remain in the availability of nonprofit housing developers, aging public infrastructure, and access to public transportation. Additionally, CDBG public service funding caps restrict the extent to which the City can support agencies meeting critical needs.

The special needs population in particular requires significant and sustained investments. Their complex needs, including housing, mental health care, substance use treatment, and employment services, demand intensive case management and coordination. Addressing these needs will require continued collaboration and leveraging of available resources.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Continued education and collaboration among BVCH members will help to provide better public awareness on the myriad of needs facing homeless and special needs persons is the key to addressing these important needs. Bryan-College Station is a giving community and regularly demonstrates its generosity during fundraisers and through individual donation of time and money. Local charitable efforts, coupled with continued state and federal resources, will allow the community to continue to provide for the needs of our most disadvantaged citizens. The city's Community Development staff will:

- Continue to coordinate with other city departments on efforts to upgrade and improve infrastructure in older, lower-income neighborhoods.
- Through rehabilitation/reconstruction, continue to improve housing conditions for low-income homeowners.
- Continue outreach to non-profit service groups like UM Army to further assist Bryan's low-income residents.
- Continue outreach to home-builders and developers to encourage investment in older Bryan neighborhoods.
- Continue to seek additional funding resources for City and non-profit agency program efforts.

DRAFT

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve and expand affordable housing units	2025	2029	Affordable Housing	City Wide	Affordable Housing		
2	Affordable Homeownership options	2025	2029	Affordable Housing	City Wide	Affordable Housing		
3	Production of affordable units	2025	2029	Affordable Housing	City Wide	Affordable Housing		
4	Expand and enhance public service programs that improve supportive services for vulnerable and low-income populations	2025	2029	Non-Housing Community Development	City Wide	Public Services		
5	Support small business development to create and retain jobs, fostering economic growth.	2025	2029	Non-Housing Community Development	City Wide	Economic Development		
6	Remove substandard and unsafe structures to eliminate blight, improve neighborhood safety, and support future redevelopment opportunities.	2025	2029		City Wide	Clearance & Demolition		
7	Support the development, rehabilitation, and accessibility of public facilities that serve low- and moderate-income residents	2025	2029	Non-Housing Community Development	City Wide	Public Facilities		
8	Invest in infrastructure improvements to enhance safety, accessibility, and quality of life in low- and moderate-income neighborhoods.	2025	2029	Non-Housing Community Development	City Wide	Public Infrastructure		
9	Program Administration, Grant compliance	2025	2029	Program Administration, Grant Compliance	City Wide	Program Administration		

Table 52 – Goals Summary

Goal Descriptions

DRAFT

Goal Name	Goal Description
Preserve and expand affordable housing units	Provide technical and/or financial support to low- and moderate-income homeowners to rehabilitate their property to standard condition and provide maintenance education to low- and moderate-income homeowners.
Affordable Homeownership options	Provide home buyer's counseling and down payment assistance to eligible persons including extremely low, low, moderate income and special needs populations.
Production of affordable units	Support the production of affordable housing units through partnerships with Community Housing Development Organizations (CHDOs) and other qualified developers. This includes leveraging HOME funds to increase the availability of decent, safe, and affordable housing for low- and moderate-income households.
Expand and enhance public service programs that improve supportive services for vulnerable and low-income populations	Provide technical assistance and/or funding for programs through an annual application process, to non-profit agencies providing essential or expanded direct services to low- and moderate-income persons including, but not limited to: transportation, health and dental services, housing and shelter, food support, counseling/case-management, and other health and social services.
Support small business development to create and retain jobs, fostering economic growth.	Provide stabilization assistance to small businesses, micro-enterprise programs, and other businesses, such as Section 3 businesses to stabilize and enhance mixed use neighborhoods and create or retain job opportunities.
Remove substandard and unsafe structures to eliminate blight, improve neighborhood safety, and support future redevelopment opportunities.	Provide technical and/or funding assistance for projects and/or programs addressing and eliminating slum and blight influences, to include: dangerous and dilapidated vacant structures, health and safety violations, and other local code violations that cause blighting and/or public health concerns. Only if needed, funding available, and application received.
Support the development, rehabilitation, and accessibility of public facilities that serve low- and moderate-income residents	Provide technical assistance and/or funding, when available, through an annual grant application process to increase/improve access to municipal public facilities (i.e., parks) or non-profit facilities (i.e., health and human service facilities) for low- and moderate-income persons or special needs populations. 1 project if funds available and application submitted.

Invest in infrastructure improvements to enhance safety, accessibility, and quality of life in low- and moderate-income neighborhoods.	Provide technical assistance and/or funding, when available through an annual application process, to increase pedestrian mobility and safety by expanding and improving sidewalks to provide better accessibility through neighborhoods, to amenities to schools and public transportation, or to extend or improve public utility access to low- and moderate-income neighborhoods, or to increase vehicular mobility and safety by expanding or improving streets to provide better accessibility to or through low- and moderate-income neighborhoods. 1 project if funds available and application submitted to improve quality of life in lower-income areas, serving at least 51% low- and moderate-income persons.
Program Administration, Grant compliance	On behalf of the City, provide administration and technical assistance to ensure the continued receipt and proper use of available local, state and/or federal funding to benefit the citizens of Bryan by promoting the U.S. Dept. of HUD's objectives of: decent Housing, suitable living environment, and expand economic opportunities, and ensuring the outcomes of: availability/accessibility; affordability; or sustainability.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not applicable.

Activities to Increase Resident Involvements

The Bryan Housing Authority continues to provide a variety of services to residents, to include: parenting Skills, dropout prevention, domestic violence and substance abuse prevention, health fairs and healthcare assistance, pregnancy outreach, budgeting, homeownership training, GED and higher education assistance, youth leadership development and computer classes. BHA is also initiating character building sessions during the summer for neighborhood youth, and fitness program for adults. BHA is currently working to initiate a neighbor association and involves residents by hosting appreciation dinners, facilitating support groups, and encouraging local service groups to mentor BHA youth.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the ‘troubled’ designation

Not applicable

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The City of Bryan has conducted a thorough review of its policies and procedures to identify any potential barriers to the development, maintenance, or improvement of affordable housing. While development regulations are designed to protect public health, safety, and welfare, the City strives to balance these goals with the need for affordable housing. This analysis found no significant local barriers currently impeding affordable housing in Bryan. However, potential future challenges could arise from factors such as developer fees, impact fees, code requirements, zoning, and other land use regulations.

Barriers to affordable housing often originate from development standards like large minimum lot sizes and restrictive zoning, which can increase costs and limit housing density. These issues are common across many Texas communities and are being actively considered within Bryan's local context. For example, in 2019, the City amended its zoning by converting the Mixed Use-1 (MU-1) Residential district—which allowed manufactured homes by right—into the Residential District 5000 (RD-5), which generally prohibits manufactured homes except for limited state law allowances. This change affected approximately 2,600 properties.

Recognizing the potential impact of this zoning change, the City has taken steps to provide resources and guidance to affected manufactured home owners to help them navigate these new regulations. This proactive approach reflects Bryan's commitment to balancing regulatory requirements with the needs of its residents and maintaining affordable housing opportunities.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Construction of new housing or renovation of existing units is inexpensive in terms of development and inspection fees, meaning that costs do not inhibit development of affordable units. Development standards facilitate the development of both market and affordable residential units. The city will regularly analyze its development standards to identify potential barriers to the production or maintenance of affordable housing. The city avoids duplication between local jurisdictions and ordinances are enforced solely by the City, eliminating redundant, steps that add to costs. Zoning allows for minimally sized lots to accommodate development of affordable housing.

Building fees are kept as reasonable as possible. Those collected are generally less than those recommended by national advisory boards. In example, model codes recommend a plan review fee AND a permit fee, but the City has chosen NOT to collect plan review fees or building impact fees. The City continues to assess fees and processes to ensure affordable housing is not hindered and allows flexibility in building requirements when appropriate. Bryan uses a single fee based on square footage. Building, plumbing, mechanical, and electrical permit cost are added together for a new home. In Bryan, the valuation is simply \$66 per square foot with one permit cost. Further, permit fees for City-sponsored developments are waived for participating non-profit developers. Outstanding city liens are also waived for nonprofit developers acquiring property with liens for code enforcement actions. Development expenses are minimal in terms of housing construction and renovation costs. Goals include collaborative efforts with private and public entities so that resources can be leveraged.

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Bryan actively consults with the Brazos Valley Coalition for the Homeless, the local Continuum of Care (CoC), in determining priorities for ESG funding and in the development of strategies related to homelessness prevention and housing stability. City staff participate in CoC meetings and planning sessions to coordinate on funding decisions, ensure alignment with CoC goals, and avoid duplication of services across agencies.

Through this collaboration, the City works with CoC partners to:

- Allocate ESG Funds: CoC input is integral in identifying service gaps and directing ESG resources to the most effective emergency shelter, homelessness prevention, and rapid re-housing activities. Funding decisions reflect shared priorities developed in consultation with CoC member organizations, including service providers, housing agencies, and advocacy groups.
- Develop Performance Standards and Evaluate Outcomes: The City and CoC collaborate to establish performance benchmarks for ESG-funded programs. These include goals related to housing stability, length of homelessness episodes, and placement in permanent housing. Program outcomes are regularly reviewed by the CoC and City staff to inform future funding decisions and improve service delivery.
- Administer and Expand HMIS: The City supports CoC-led efforts to manage and expand the HMIS. This includes participating in the development of policies and procedures for data quality, privacy, and reporting. ESG subrecipients are required to enter data into HMIS in accordance with CoC standards. The City helps ensure compliance with HUD requirements, including CoC, SuperNOFA, and AHAR submissions.

Additionally, the City supports the CoC's efforts to maintain HEARTH Act compliance, participate in the annual Point-in-Time Count, and evaluate policies and procedures governing the overall CoC system. These collaborative efforts ensure a coordinated, data-driven approach to addressing homelessness in Bryan and the surrounding region.

Addressing the emergency and transitional housing needs of homeless persons

The City of Bryan's Strategic Plan supports Twin City Mission and Project Unity as they apply for and administer Emergency Shelter Grant (ESG) and Housing for People with AIDS (HOPWA) grant funded programs to support local homeless populations. Other local entities provide emergency and/or transitional housing and supportive services, to include: Bryan Public Housing Authority, Emanuel Baptist Church, Family Promise, the Brazos Valley Council of Governments (Housing Choice Vouchers), Mental Health Mental Retardation Authority of Brazos Valley, and the Salvation Army.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of

time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Strategic Plan goals in the City of Bryan's Strategic Plan support the many local agencies that provide supportive services to local homeless populations that assist individuals and families in transitioning from emergency shelter to permanent housing. Through the City's participation in the Brazos Valley Coalition for the Homeless and CoC efforts, and its Public Service Agency funding, local agencies serving the unique needs of homeless persons can apply for grant funding of eligible programs helping homeless families, individuals, veterans and unaccompanied youth. Local partnering agencies providing services and counseling to help persons avoid or shorten homelessness, and avoid repeat homelessness, include:

Twin City Mission, Project Unity, Bryan Public Housing Authority, Emanuel Baptist Church, Family Promise, the Brazos Valley Council of Governments, Mental Health Mental Retardation Authority of Brazos Valley, Salvation Army, and others.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The City of Bryan's Consolidated Plan includes goals encouraging inter-agency coordination to help low-income individuals and families avoid homelessness resulting from discharge from various programs and/or institutions. Local healthcare facilities maintain policies to ensure that persons discharged will receive case management assistance in obtaining appropriate housing placement. Facilities consult with the Brazos Valley Coalition for the Homeless to avoid having released patients discharged into homelessness but rather, to a state, federal, emergency or transitional facility. Local homeless service providers and other social service agencies regularly collaborate with discharge staff from these facilities to identify placements for patients that are most suited for their needs and that do not result in the patient becoming homeless.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Bryan has emphasized lead-based paint (LBP) counseling and awareness in all its programs. All Down-payment and Closing Cost assistance for pre-1978 properties in the homebuyer program requires LBP counseling as well as testing and remediation. The City also maintains a continued focus on the hazards of lead-based paint and the need for lead-based paint testing of potential rehabilitation projects.

Additionally, the City has continued to work with public service agencies caring for or providing services to children to reduce lead-based hazards in the community. The city's Community Development Department has staff members with years of experience and training related to the identification, planning, and remediation of lead-based paint hazards. Housing program activities have policies and procedures in place to, not only remediate lead-based paint hazards in existing structures, but to also promote and facilitate the development of new, affordable and safe housing units that will benefit the lower-income community for decades to follow.

The following lead-based paint strategies related to City of Bryan Community Development programs and projects are ongoing:

- Provide officials and citizens information and education about lead-based paint.
- Integrate lead hazard evaluation and reduction activities into program housing activities.
- Provide training opportunities for staff to manage lead-based paint impacted projects.
- Make information on childhood lead blood levels available to local officials and citizens.
- Continue to promote the development of new, affordable, and safe housing locally.

How are the actions listed above related to the extent of lead poisoning and hazards?

The actions outlined by the City of Bryan directly address the risks identified through local data on lead poisoning and demonstrate a proactive response to mitigating lead-based paint (LBP) hazards in the community. According to the Texas Department of State Health Services, 19 out of 1,388 children under age 15 in Bryan were found to have elevated blood lead levels (≥ 5 micrograms per deciliter). While this percentage is relatively low, it still signals an ongoing need for awareness and prevention—particularly in communities with older housing stock.

The City's policies, such as mandatory LBP counseling, testing, and remediation for pre-1978 properties, are designed to reduce these risks, especially for low- and moderate-income households. By integrating lead hazard evaluation into all housing program activities and promoting new, lead-safe housing development, Bryan is reducing the likelihood of future lead exposure. Ongoing staff training, coordination with public service agencies, and public education further reinforce these efforts.

Overall, these strategies reflect a comprehensive and preventive approach that aligns with local data and public health recommendations, targeting the root causes of lead exposure and protecting the most vulnerable populations, particularly children, from long-term harm.



TEXAS
Health and Human
Services

**Texas Department of State
Health Services**

Blood Lead Surveillance Branch

**Year 2022 Counts for Children Tested and Children with Blood Lead Levels
≥5 µg/dL, by Zip Code, for Brazos County, City of Bryan, and City of College
Station***

Brazos County, Texas			City of Bryan, Texas			City of College		
ZIP Code	Children Tested	Children with a Blood Lead Level ≥5µg/dL	Zip Code	Children Tested	Children with a Blood Lead Level ≥5µg/dL	Zip Code	Children Tested	Children with a Blood Lead Level ≥5µg/dL
77801	224	<5	77801	223	<5	77840	408	<5
77802	268	<5	77802	255	<5	77841	0	0
77803	550	11	77803	530	10	77842	11	0
77805	8	0	77805	8	0	77843	<5	0
77806	<5	0	77806	<5	0	77845	548	<5
77807	208	<5	77807	<5	<5	Total	968	<5
77808	175	<5	77808	200	<5			
77840	414	<5	77842	166	0			
77841	0	0	Total	1,388	19			
77842	11	0						
77843	<5	0						
77845	577	<5						
77862	<5	0						
77866	0	0						
77881	<5	0						
Total	2,442	24						

Counts based on an unduplicated child's highest blood lead level in 2021 for age 0-14 years old.
Counts between 1 - 4 are expressed as "<5" to protect identity of children.

How are the actions listed above integrated into housing policies and procedures?

Housing program activities have policies and procedures in place to, not only remediate lead-based paint hazards in existing structures, but to also promote and facilitate the development of new, affordable and safe housing units that will benefit the lower-income community for decades to follow.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City of Bryan continues to implement the antipoverty strategy established in the previous Consolidated Plan, with ongoing efforts to reduce poverty and promote economic stability for low-income residents. Key components of this strategy include:

- Increasing the availability of safe, decent, and affordable housing for low-income households.
- Supporting public service programs that improve quality of life and promote self-sufficiency.
- Ensuring access to shelter and supportive services to prevent and end homelessness, helping individuals maintain stable housing.
- Encouraging job creation through technical assistance to businesses, particularly those offering living wage employment to low-income individuals.
- Investing in programs that support the development and long-term success of children, helping break the cycle of poverty.

In alignment with HUD's objectives—providing decent housing, creating a suitable living environment, and expanding economic opportunities—the 2025–2029 Consolidated Plan addresses a range of housing, homelessness, and non-housing community development needs. Each funded activity is designed to achieve one or more outcomes: accessibility, affordability, or sustainability.

The Needs Assessment conducted for this Plan highlights the ongoing challenges faced by Bryan's low-income and vulnerable populations. In response, the City will continue to collaborate with partners to prevent homelessness, increase access to affordable housing, and support programs that empower residents through employment and education opportunities.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The city's goals to reduce poverty directly link to its Housing Plan. Affordable, accessible, safe and efficient housing is important for household financial stability. Rehabilitation program efforts ensure that low-income households are not financially burdened by costly repairs, high utility bills and health risks associated with substandard housing. Likewise, housing voucher and utility assistance can help low-income households avoid being driven further into poverty, and provides opportunities to strengthen their financial situations and become more self-reliant. Similarly, by providing counseling and down-payment assistance, homebuyer programs help those ready to become homeowners do so, without jeopardizing their financial health.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City of Bryan maintains policies and procedures for all CDBG and HOME funded program activities. Additionally, Bryan actively encourages Historically Under-utilized Businesses (HUBs) to participate in bid submittals for grant funded projects and actively seeks out minority businesses by affirmatively soliciting HUBs. The City Monitoring Plan consists of three reviews:

Internal Review of City Programs:

Record keeping and forms used for program implementation constitute legal instruments. The City Attorney, prior to their use, approves contracts. All other forms necessary for program use are developed and approved by CD staff. Staff is responsible for maintaining accurate and complete files as required by HUD on each program participant. In addition, staff conducts reviews to determine compliance with program requirements. Annual monitoring ensures long term compliance, including but not limited to, ensuring clients have hazard insurance and verifying that homes are owner occupied. Housing assistance activities are monitored for compliance with the Fair Housing and Equal Opportunities (FHEO) laws. Bryan consistently updates strategies to monitor efforts to affirmatively further Fair Housing. Bryan will seek technical assistance from FHEO staff in the strategy development to use in monitoring sub-recipients. On-site inspections are done at the beginning of each housing project to ensure code compliance.

Bryan shall meet all requirements set forth by OMB and documentation shall conform to HUD 24 CFR parts 84 and 85 as described in 24 CFR Section 570.502, the City accounting practices and applicable Federal Office of Management and Budget Circular 2 Part 200. An independent audit is conducted annually to ensure that grant funds are used in accordance with program requirements. The City monitors internal benchmarks for goals on a quarterly basis. Additional financial reconciliation is done monthly.

Sub-recipient Monitoring:

Monitoring provides a basis for assessing a program and identifying concerns. A secondary goal is to obtain data assess achievement. Evaluations summarize monitoring findings and program goals, and measure progress towards goals during program efforts. All sub-recipients are monitored at least once quarterly on-site (when feasible unless precluded by social distancing during pandemics) and quarterly in-house, with a final onsite (after year-end), to ensure compliance before contract close-out. Bryan has responsibility for overall CDBG performance and Consolidated Plan compliance, including sub-recipient performance. Clear record keeping of sub-recipients is essential to grant accountability. Responsibility for maintaining many of the records is assigned to the sub-recipient, including documenting activities with special requirements. Bryan serves as the grantee and contracts with sub-recipient organizations to provide services to low-income citizens. The contract details the services provided and a concise statement of conditions, requirements, and performance criteria. The City Attorney, prior to execution, shall approve the contract.

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City of Bryan anticipates receiving Community Development Block Grant (CDBG - \$919,611) and HOME Investment Partnerships Program (HOME - \$347,844.46) grant funding from the U.S. Department of Housing and Urban Development (HUD) on an annual basis through the duration of the 2025-29 Consolidated Plan period. Annual allocations are based on a HUD-established formula. These resources, along with those from other public, private, and nonprofit partners, establish a multi-faceted approach to addressing the goals and objectives identified in this Strategic Plan.

The CDBG program provides communities with resources to address a wide range of unique community development needs by providing decent housing, a suitable living environment, and expanding economic opportunities for low- and moderate-income persons. Activities may include affordable housing services, homeownership assistance, acquisition, public facility/infrastructure improvements, clearance and demolition, public services, economic development assistance, and other grant eligible activities.

The HOME program is dedicated solely to development of affordable housing opportunities for low-income households. The City of Bryan anticipates partnering with local non-profit and for-profit entities, to promote affordable housing for low-income persons locally. At least 15% of the grant must be set-aside to fund housing to be owned, developed, or sponsored by experienced, community-driven nonprofit groups designated as Community Housing Development Organizations (CHDOs), unless the City chooses to utilize applicable waivers lifting this requirement for the 2025-26 program year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$919,611	\$40,000	0	\$959,611	\$3,838,444	Expected amount for rest of Con Plan is Year 1 x 4.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership	\$347,844.46	\$70,000	0	\$417,844.46	\$1,671,377.84	Expected amount for rest of Con Plan is Year 1 x 4.

Table 53 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal grant funds will be used to leverage additional resources through various means, including property donations from the City or other entities, contributions from nonprofit organizations such as Habitat for Humanity, and other nonprofit developers involved in the rehabilitation or construction of affordable housing. Leveraging also includes support through sweat equity, private fundraising, and in-kind resources.

The City's down payment assistance program leverages resources from local financial institutions that provide permanent mortgage financing to homebuyers. Public service agencies receiving CDBG funding also contribute private and nonprofit dollars toward service delivery, further enhancing the impact of federal investments.

Although the City has historically received a waiver for the HOME Program match requirement, no waiver has been granted yet for the current period. However, the City anticipates receiving one based on past precedent. Regardless, the City continues to monitor match requirements closely and maintains funds set aside to fulfill the match obligation, equivalent to 12.5 cents for every HOME dollar expended.

Additionally, the City contributes general funds toward improvements in parks, public facilities, and infrastructure in low- and moderate-income neighborhoods. These efforts are coordinated with the Community Development Department when appropriate, further leveraging CDBG resources to maximize community benefit.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City does not currently have available publically owned property for use of affordable housing, but the City does periodically have property donated that stipulates the property be used for affordable housing.

Discussion

The City will receive \$919,611 of CDBG (plus anticipated program income of \$40,000) and \$347,844.46 of HOME (plus anticipated program income of \$70,000). The City continues existing partnerships and seeks new ones to create additional momentum in reaching goals. Partnerships include non-profit and for-profit developers, the Home Builders Association, local housing committees, public service agencies, and the Brazos Valley Coalition for the Homeless.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve and expand affordable housing units	2025	2029	Affordable Housing	City Wide	Affordable Housing		
2	Affordable Homeownership options	2025	2029	Affordable Housing	City Wide	Affordable Housing		
3	Production of affordable units	2025	2029	Affordable Housing	City Wide	Affordable Housing		
4	Expand and enhance public service programs that improve supportive services for vulnerable and low-income populations	2025	2029	Non-Housing Community Development	City Wide	Public Services		
5	Support small business development to create and retain jobs, fostering economic growth.	2025	2029	Non-Housing Community Development	City Wide	Economic Development		
6	Remove substandard and unsafe structures to eliminate blight, improve neighborhood safety, and support future redevelopment opportunities.	2025	2029		City Wide	Clearance & Demolition		
7	Support the development, rehabilitation, and accessibility of public facilities that serve low- and moderate-income residents	2025	2029	Non-Housing Community Development	City Wide	Public Facilities		
8	Invest in infrastructure improvements to enhance safety, accessibility, and quality of life in low- and moderate-income neighborhoods.	2025	2029	Non-Housing Community Development	City Wide	Public Infrastructure		
9	Program Administration, Grant compliance	2025	2029	Program Administration, Grant Compliance	City Wide	Program Administration		

Table 54 – Goals Summary

Goal Name	Goal Description
Preserve and expand affordable housing units	Provide technical and/or financial support to low- and moderate-income homeowners to rehabilitate their property to standard condition and provide maintenance education to low- and moderate-income homeowners.
Affordable Homeownership options	Provide home buyer's counseling and down payment assistance to eligible persons including extremely low, low, moderate income and special needs populations.
Production of affordable units	Support the production of affordable housing units through partnerships with Community Housing Development Organizations (CHDOs) and other qualified developers. This includes leveraging HOME funds to increase the availability of decent, safe, and affordable housing for low- and moderate-income households.
Expand and enhance public service programs that improve supportive services for vulnerable and low-income populations	Provide technical assistance and/or funding for programs through an annual application process, to non-profit agencies providing essential or expanded direct services to low- and moderate-income persons including, but not limited to: transportation, health and dental services, housing and shelter, food support, counseling/case-management, and other health and social services.
Support small business development to create and retain jobs, fostering economic growth.	Provide stabilization assistance to small businesses, micro-enterprise programs, and other businesses, such as Section 3 businesses to stabilize and enhance mixed use neighborhoods and create or retain job opportunities.
Remove substandard and unsafe structures to eliminate blight, improve neighborhood safety, and support future redevelopment opportunities.	Provide technical and/or funding assistance for projects and/or programs addressing and eliminating slum and blight influences, to include: dangerous and dilapidated vacant structures, health and safety violations, and other local code violations that cause blighting and/or public health concerns. Only if needed, funding available, and application received.

Support the development, rehabilitation, and accessibility of public facilities that serve low- and moderate-income residents	Provide technical assistance and/or funding, when available, through an annual grant application process to increase/improve access to municipal public facilities (i.e., parks) or non-profit facilities (i.e., health and human service facilities) for low- and moderate-income persons or special needs populations. 1 project if funds available and application submitted.
Invest in infrastructure improvements to enhance safety, accessibility, and quality of life in low- and moderate-income neighborhoods.	Provide technical assistance and/or funding, when available through an annual application process, to increase pedestrian mobility and safety by expanding and improving sidewalks to provide better accessibility through neighborhoods, to amenities to schools and public transportation, or to extend or improve public utility access to low- and moderate-income neighborhoods, or to increase vehicular mobility and safety by expanding or improving streets to provide better accessibility to or through low- and moderate-income neighborhoods. 1 project if funds available and application submitted to improve quality of life in lower-income areas, serving at least 51% low- and moderate-income persons.
Program Administration, Grant compliance	On behalf of the City, provide administration and technical assistance to ensure the continued receipt and proper use of available local, state and/or federal funding to benefit the citizens of Bryan by promoting the U.S. Dept. of HUD's objectives of: decent Housing, suitable living environment, and expand economic opportunities, and ensuring the outcomes of: availability/accessibility; affordability; or sustainability.

Projects

AP-35 Projects – 91.220(d)

Introduction

During the PY2025-26, the City of Bryan will administer approximately \$1,377,455.46 in federal grant funds and anticipated program income. The \$919,611 CDBG grant funding, coupled with approximately \$40,000 of program income, will be allocated for a variety of local health and human service program activities promoting a suitable living environment, and enhancing availability/accessibility of services.

Those activities include: funding for a student support program for homeless youth or those in foster care; a support program for kinship caregiver; a medical care program for prenatal care and health education; and financial stability program that provides families in crisis with financial assistance and case management.

In addition, some of the CDBG funding allocation and program income will be used to promote decent and affordable housing, including: major rehabilitation/reconstruction; new affordable housing construction; minor repair; and down-payment assistance, volunteer demolition, acquisition, economic development, and staff program delivery. The HOME grant funds, totaling \$347,844.46 plus approximately \$70,000 of projected program income, will also be allocated to several housing assistance activities promoting decent and affordable housing. Those activities include: major rehabilitation/reconstruction; new affordable housing construction; minor repair; and down-payment assistance. CHDOs will participate in the promotion of decent and affordable housing locally.

Projects

#	Project Name
1	Owner Housing Assistance – Rehab/Demo - CDBG
2	Rehabilitation of Existing Units: Owner-occupied - HOME
3	Acquisition of Existing Units: Homebuyer Down-payment
4	Production of Affordable Units: Rental Housing - CHDO
5	Public Services - CDBG
6	Economic Development: Job Creation and Retention
7	Program Administration: Grant Compliance - CDBG
8	Program Administration: Grant Compliance - HOME

Table 55 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Allocations were determined based on needs as determined by the various input received through: public hearings, surveys, focus groups, consultation, and data research and analysis. Obstacles remain those typical in previous program years, to include: eligibility determination (i.e., clients producing documents necessary to prove clear title to properties, income eligibility, or some other statutory requirement). Additionally, the numbers and types of programs and services needed in the community during the Coronavirus pandemic have also stretch available non-profit and governmental capacity, to include staffing and funding.

AP-38 Project Summary
Project Summary Information

DRAFT

1	Project Name:	Owner Housing Assistance – Rehab/Demo - CDBG
	Target Area:	City Wide
	Goals Supported	Preserve & expand affordable housing units Remove substandard and unsafe structures to eliminate blight, improve neighborhood safety, and support future redevelopment opportunities.
	Needs Addressed	Affordable Housing Clearance & Demolition
	Funding	CDBG: \$562,748
	Description	
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	30 households
	Location Description	To be determined.
2	Planned Activities	Activities will provide up to 30 households housing assistance in the form of: infrastructure, new development, rehabilitation/replacement, handicap accessibility, minor repair, and staff and other related costs necessary to carry out CDBG program activities for housing activities.
	Project Name:	Rehabilitation of Existing Units: Owner-occupied - HOME
	Target Area:	City Wide
	Goals Supported	Preserve & expand affordable housing units
	Needs Addressed	Affordable Housing
	Funding	HOME: \$258,883.34
	Description	
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	2 major rehab/reconstruction
	Location Description	To be determined.

	Planned Activities	Activities will provide up to 2 households housing assistance in the form of: infrastructure, new development, rehabilitation/replacement, handicap accessibility, minor repair, down payment assistance, acquisition, or demolition, and staff and other related costs necessary to carry out CDBG program activities for housing activities.
3	Project Name:	Acquisition of Existing Units: Homebuyer Down-payment
	Target Area:	City Wide
	Goals Supported	Affordable homeownership options
	Needs Addressed	Affordable Housing
	Funding	HOME: \$72,000
	Description	
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	3 first time homebuyers
	Location Description	To be determined.
	Planned Activities	It is estimated that 3 households will be provided down-payment assistance.
4	Project Name:	Production of Affordable Units: Rental Housing - CHDO
	Target Area:	City Wide
	Goals Supported	Production of Affordable Units
	Needs Addressed	Affordable Housing
	Funding	HOME: \$52,176.67
	Description	
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	One eligible very-low, low- or moderate -income households and/or special needs client will benefit from this activity.
	Location Description	To be determined.

	Planned Activities	CHDO activities will be provided funding through a request for proposal project not less than every two years. Current CHDO's will be monitored for oversight of programmatic and administrative requirements. Activity addresses production of affordable units, and program delivery. Development of 1 unit is expected.
5	Project Name:	Public Services - CDBG
	Target Area:	City Wide
	Goals Supported	Expand and enhance public service programs that improve supportive services for vulnerable and low-income populations.
	Needs Addressed	Public Services
	Funding	CDBG: \$137,941
	Description	
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	1,352 unduplicated clients from 4 PSA
	Location Description	
6	Planned Activities	This activity will serve 1,352 unduplicated low- and moderate-income household.
	Project Name:	Economic Development: Job Creation and Retention
	Target Area:	City Wide
	Goals Supported	Support small business development to create and retain jobs, fostering economic growth.
	Needs Addressed	Economic Development
	Funding	CDBG: \$75,000
	Description	
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	2 LMI businesses helped
	Location Description	To be determined

	Planned Activities	Economic Development program providing business support to promote job creation and/or retention. Assistance will be provided to stabilize business, thereby allowing them to create or retain available jobs for low- to moderate-income employee due to local economic slow-down, pandemics, or declared disasters. It's expected that 2 lower-income persons will retain, or gain employment. The program provides for program delivery of staff oversight of the activity.
7	Project Name:	Program Administration: Grant Compliance - CDBG
	Target Area:	City Wide
	Goals Supported	Program Administration, Grant Compliance
	Needs Addressed	Program Administration
	Funding	CDBG: \$183,922
	Description	
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable, see program activity estimates.
	Location Description	1803 Greenfield Plaza, Bryan, TX 77802
8	Planned Activities	Administrative activities and expenditures related to the management of CDBG funded projects including, but not limited to, public service activities, housing assistance programs, public facility or infrastructure activities, urgent need actions (declared economic or natural disasters), other special projects, as well as program reporting, plan development, public outreach, and other necessary efforts in support of grant goals and objectives.
	Project Name:	Program Administration: Grant Compliance - HOME
	Target Area:	City Wide
	Goals Supported	Programs Administration, Grant Compliance
	Needs Addressed	Program Administration
	Funding	HOME: \$34,784.45
	Description	
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable, see program activity estimates.

	Location Description	1803 Greenfield Plaza, Bryan, TX 77802
	Planned Activities	Administrative activities and expenditures related to the management of CDBG funded projects including, but not limited to, public service activities, housing assistance programs, public facility or infrastructure activities, urgent need actions (declared economic or natural disasters), other special projects, as well as program reporting, plan development, public outreach, and other necessary efforts in support of grant goals and objectives.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

CDBG and HOME funds are not allocated based on geographic areas. Funds are distributed throughout the community based on need. Because low-income, elderly, disabled, and special needs homeowners and renters reside throughout the city, housing assistance is available citywide. Homeless persons and those facing potential homelessness also reside throughout the city making the need for shelter and housing a citywide activity. Services provided for the homeless population are located city-wide to provide maximum accessibility.

In an effort to promote livability, public services, public facilities and housing projects are generally located so as to be accessible by various modes of transportation (walking, biking, driving) and are typically on or near public bus routes provided by the local transit authority (the district) as well as Texas A&M University's off-campus bus service. Major employment assistance providers like Blinn College and the Workforce Commission are located on both, the District's and Texas A&M University's off-campus bus routes.

Assistance for special needs populations (elderly people, disabled persons, persons with drug/alcohol addictions, persons with AIDS/HIV) is provided citywide, as these populations exist throughout the city. Public services (such as Phoebe's Home, the Food Bank, and Elder-Aid) are also not limited geographically. These services are expected to be readily available and accessible to targeted audiences.

Public facilities and infrastructure improvements, such as park or sidewalk improvements, will be considered in areas of the city where 51% or more of the population meets low and moderate-income guidelines or where an organization's clients are at least 51% low to moderate income as defined by HUD. Bryan's CDAC committee members and Community Development staff will work to ensure that priority is assigned to livability issues when projects are being considered.

Economic development activities are provided citywide (unless designated a spot slum/blighted location), recognizing that low-income individuals live throughout the city with business location critical to its potential success, and that business vitality and job stability are needed for employment opportunities to be available for local citizens.

Geographic Distribution

Target Area	Percentage of Funds
City Wide	100

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Allocations for priority needs are not made on a geographical basis. See discussion above.

Discussion

Because housing, employment, and health and human service needs are found throughout the community, allocation of program funds are available citywide. As noted above, low-income, elderly, disabled, and special needs homeowners and renters reside throughout the city, therefore housing assistance is available citywide. Likewise, homeless persons and those facing potential homelessness also reside throughout the city making the need for shelter and housing a citywide activity and services provided for the homeless populations are located city-wide to provide maximum accessibility. Similarly, job opportunities are also needed throughout the community, and therefore program promoting job creation for lower-income persons is available citywide.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

In the 2025-26 Program Year, the City of Bryan will provide rehabilitation/reconstruction assistance to 3 homeowners through the Home Owner Housing Assistance Program and minor repair assistance to another 30 low-income owner-occupied dwellings. The City also anticipates that one of its CHDOs will construct 1 new affordable single-family rental home. Also anticipated is that 3 lower-income, eligible applicants will purchase homes using the City of Bryan's Down-Payment Assistant Program. It is expected that 14 of the 33 homeowners will be elderly and/or disabled.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	23
Special-Needs	14
Total	37

Table 57 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
The Production of New Units	1
Rehab of Existing Units	33
Acquisition of Existing Units	3
Total	37

Table 58 - One Year Goals for Affordable Housing by Support Type

Discussion

The above noted affordable housing activities are targeted toward low-income home owners, special needs renters, home buyers. While the City does not directly provide housing assistance to homeless populations, City of Bryan Community Development Services Department staff serve on the area CoC organization – Brazos Valley Coalition for the Homeless (BVCH), which addresses local homeless issues, apply for federal funds, and coordinates among local public services providers and other non-profit and governmental agencies to ensure that the needs of area homeless populations are identified and addressed.

AP-60 Public Housing – 91.220(h)

Introduction

While no CDBG or HOME funds will be allocated to the local public housing authority, the Bryan Housing Authority (BHA), plans continued improvements to its 300 duplex and townhome style subsidized rental units. A variety of support services are made available to the residents to promote a healthy affordable living environment for all tenants, young and old. The Brazos Valley Community Action Agency will also make 10,000 to 12,000 Housing Choice Vouchers available throughout the Bryan-College Station community and, likewise, provide various support programs for person applying for and utilizing rental assistance vouchers.

Actions planned during the next year to address the needs to public housing

It is our goal to continue to provide affordable, safe and decent housing for residents in our area. The City will continue to provide technical assistance to BHA and support their initiatives.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

BHA also continues to provide a variety of services to residents, to include: homeownership training, parenting Skills, dropout prevention, domestic violence and substance abuse prevention, health fairs and healthcare assistance, pregnancy outreach, budgeting, GED and higher education assistance, youth leadership development and computer classes. BHA is also initiated a character-building session during the summer for youth, and fitness program for adults as well as an association of BHA residents.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable.

Discussion

Upon request, the City of Bryan reviews BHA grant applications and provides the required Certification of Consistency for the U.S. Dept. of HUD. The BHA is an important partner in the delivery of affordable housing and related support services. BHA rental units and other program assistance provide the support and encouragement needed by residents wanting to achieve self-sufficiency. With BHA support and assistance from other programs and agencies, BHA tenants have the opportunity to achieve increased self-sufficiency for themselves and their families.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

In support of homeless and special needs activities, the City supports Twin City Mission and Project Unity on applications for ESG and HOPWA funds to meet homeless needs, and is also a member of the Brazos Valley Coalition for the Homeless (BVCH). BVCH will conduct regular homeless surveys to gather information on needs with which to do regular gaps analysis updates and to complete funds for CoC activities by service agencies meeting needs of the local homeless population.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City will coordinate with BVCH in service delivery to ensure needs are addressed. Agencies will include: Bryan Public Housing Authority, B/CS United Way, The Brazos Valley Community Action Programs, Project Unity, BCS Habitat for Humanity, Bryan Housing Authority, Twin City Mission, Elder-Aid, Emanuel Baptist Church, Family Promise, the Brazos Valley Council of Governments, Mental Health Mental Retardation Authority of Brazos Valley, the Salvation Army, and the Texas Department of Housing and Community Affairs.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City will address emergency shelter and transitional housing needs by allocating public service funds to agencies that assist individuals and families at risk of homelessness, aiming to keep them housed and reduce reliance on shelters. For example, the City supports programs like Project Hope, which assists homeless youth and those in foster care. Through partnerships with such agencies, the City seeks to indirectly meet emergency shelter and transitional housing needs.

Additionally, the City will continue participating in the annual Point-in-Time (PIT) Count, support the Brazos Valley Coalition for the Homeless (BVCH), and engage in coordinated outreach efforts to expand available shelter beds, particularly for individuals experiencing chronic homelessness.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City will continue supporting information and referral services, case management, and public service connections for individuals in permanent housing, as well as for sheltered and unsheltered homeless individuals through local providers. In partnership with the Brazos Valley Coalition for the Homeless (BVCH), the City will work to ensure quality case management services that help individuals secure and maintain housing. To support long-term stability, the City and BVCH will also coordinate with the

Workforce Board to address employment and job training needs.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

To increase permanent housing options, the City will support agencies in seeking additional funding to preserve and expand affordable housing opportunities. This includes reviewing Bryan Housing Authority (BHA) applications and providing Certificates of Consistency when requested. The City will also work with local providers to identify and reduce obstacles within assistance delivery systems. In collaboration with the Brazos Valley Coalition for the Homeless (BVCH), the City will promote housing opportunities for homeless families with children and ensure that quality case management services are in place to help individuals and families avoid homelessness and secure stable housing. Additionally, the City will assist agencies in evaluating temporary housing programs and encourage the continuation of effective practices.

Discussion

The City's collaboration with the BVCH member agencies ensures a comprehensive approach to identifying and meeting CoC needs locally. Many of the health and human service providers locally provide assistance directly addressing homelessness, or other services and support addressing the ancillary issues and needs of homeless individuals and families. Collectively, homeless clients have the means to receive shelter and services, and to be counseled as they plan their transition from homelessness to permanent affordable housing and increased self-reliance.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City of Bryan has conducted a thorough review of its policies and procedures to identify any potential barriers to the development, maintenance, or improvement of affordable housing. While development regulations are designed to protect public health, safety, and welfare, the City strives to balance these goals with the need for affordable housing. This analysis found no significant local barriers currently impeding affordable housing in Bryan. However, potential future challenges could arise from factors such as developer fees, impact fees, code requirements, zoning, and other land use regulations.

Barriers to affordable housing often originate from development standards like large minimum lot sizes and restrictive zoning, which can increase costs and limit housing density. These issues are common across many Texas communities and are being actively considered within Bryan's local context. For example, in 2019, the City amended its zoning by converting the Mixed Use-1 (MU-1) Residential district—which allowed manufactured homes by right—into the Residential District 5000 (RD-5), which generally prohibits manufactured homes except for limited state law allowances. This change affected approximately 2,600 properties.

Recognizing the potential impact of this zoning change, the City has taken steps to provide resources and guidance to affected manufactured home owners to help them navigate these new regulations. This proactive approach reflects Bryan's commitment to balancing regulatory requirements with the needs of its residents and maintaining affordable housing opportunities.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Construction of new housing or renovation of existing units is inexpensive in terms of development and inspection fees, meaning that costs do not inhibit development of affordable units. Development standards facilitate the development of both market and affordable residential units. The city will regularly analyze its development standards to identify potential barriers to the production or maintenance of affordable housing. The city avoids duplication between local jurisdictions and ordinances are enforced solely by the City, eliminating redundant, steps that add to costs. Zoning allows for minimally sized lots to accommodate development of affordable housing.

Building fees are kept as reasonable as possible. Those collected are generally less than those recommended by national advisory boards. In example, model codes recommend a plan review fee AND a permit fee, but the City has chosen NOT to collect plan review fees or building impact fees. The City continues to assess fees and processes to ensure affordable housing is not hindered and allows flexibility in building requirements when appropriate. Bryan uses a single fee based on square footage. Building, plumbing, mechanical, and electrical permit cost are added together for a new home. In Bryan, the valuation is simply \$66 per square foot with one permit cost. Further, permit fees for City-sponsored developments are waived for participating non-profit developers. Outstanding city liens are also waived for nonprofit developers acquiring property with liens for code enforcement actions. Development

expenses are minimal in terms of housing construction and renovation costs. Goals include collaborative efforts with private and public entities so that resources can be leveraged.

Discussion:

The City of Bryan has carefully evaluated its policies and procedures to identify any barriers to affordable housing development, maintenance, or improvement. While the City found no significant local obstacles, it acknowledged that potential future challenges could include developer fees, impact fees, zoning, and land use regulations. Like many Texas communities, Bryan recognizes that restrictive zoning and large minimum lot sizes can limit housing affordability and is actively monitoring such issues. A notable example was the 2019 rezoning of the Mixed Use-1 (MU-1) district to Residential District 5000 (RD-5), which restricted manufactured housing. In response, the City provided support to affected residents to ease the transition.

To reduce barriers, Bryan has implemented cost-conscious development practices, such as maintaining minimal building and permit fees, waiving fees for nonprofit developers, and streamlining inspection processes. The City also ensures zoning accommodates small lot development, avoids duplicative regulations, and continuously reviews standards for affordability impacts. These efforts support the City's broader goal of partnering with public and private entities to leverage resources and maintain housing affordability while meeting community safety and quality standards.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Bryan has partnered with multiple public and private organizations to enhance the effectiveness of programs and activities that deliver housing and social service assistance. A comprehensive network of planning entities and providers has ensured that needed and attainable goals are established, and that partnering agency capabilities and resources are leveraged in meeting goals. Duplication of services is avoided by the City's lead on certain assessment and planning efforts. Examples include the City's participation in the Joint Relief Funding Review Committee, which serves both the cities of Bryan and College Station. Likewise, the City's participation in the Community Partnership Board – representing approximately 80 agencies, the Brazos Valley Coalition for the Homeless, and United Way, all demonstrate the high level of coordination within the local housing and social service community.

Actions planned to address obstacles to meeting underserved needs

To address obstacles to meeting underserved needs, the City of Bryan will continue collaborating with local agencies, nonprofits, and community partners to expand access to critical services and housing resources. Efforts include allocating grant funding to public service agencies that support low-income, homeless, and special needs populations, providing technical assistance to strengthen local service delivery, and supporting programs that enhance self-sufficiency through case management, job training, and education. The City will also identify service gaps through ongoing consultation and adjust funding priorities to better serve underserved populations.

Actions planned to foster and maintain affordable housing

To foster and maintain affordable housing, the City of Bryan will continue to implement strategies that promote long-term housing stability for low- and moderate-income residents. This includes providing financial assistance for homebuyers through down payment support and offering opportunities for homebuyer education to prepare residents for successful homeownership. The City will also invest in the rehabilitation of existing homes to preserve the aging housing stock and ensure safe, decent living conditions for current homeowners.

Additionally, Bryan will collaborate with nonprofit and for-profit developers to increase the availability of affordable housing units, offering technical assistance and leveraging local, state, and federal resources. The City will regularly review its development policies and procedures to identify and eliminate barriers that may hinder affordable housing production, such as restrictive zoning or excessive fees. Through these coordinated efforts, the City aims to create a balanced housing environment that supports both preservation and new development to meet the evolving needs of its community.

Actions planned to reduce lead-based paint hazards

The City's policies, such as mandatory LBP counseling, testing, and remediation for pre-1978 properties, are designed to reduce these risks, especially for low- and moderate-income households. By integrating lead hazard evaluation into all housing program activities and promoting new, lead-safe housing

development, Bryan is reducing the likelihood of future lead exposure. Ongoing staff training, coordination with public service agencies, and public education further reinforce these efforts.

Overall, these strategies reflect a comprehensive and preventive approach that aligns with local data and public health recommendations, targeting the root causes of lead exposure and protecting the most vulnerable populations, particularly children, from long-term harm.

Actions planned to reduce the number of poverty-level families

The City of Bryan continues to implement the antipoverty strategy established in the previous Consolidated Plan, with ongoing efforts to reduce poverty and promote economic stability for low-income residents. Key components of this strategy include:

- Increasing the availability of safe, decent, and affordable housing for low-income households.
- Supporting public service programs that improve quality of life and promote self-sufficiency.
- Ensuring access to shelter and supportive services to prevent and end homelessness, helping individuals maintain stable housing.
- Encouraging job creation through technical assistance to businesses, particularly those offering living wage employment to low-income individuals.
- Investing in programs that support the development and long-term success of children, helping break the cycle of poverty.

In alignment with HUD's objectives—providing decent housing, creating a suitable living environment, and expanding economic opportunities—the 2025–2029 Consolidated Plan addresses a range of housing, homelessness, and non-housing community development needs. Each funded activity is designed to achieve one or more outcomes: accessibility, affordability, or sustainability.

The Needs Assessment conducted for this Plan highlights the ongoing challenges faced by Bryan's low-income and vulnerable populations. In response, the City will continue to collaborate with partners to prevent homelessness, increase access to affordable housing, and support programs that empower residents through employment and education opportunities.

Actions planned to develop institutional structure

The City will continue its partnerships, developed over years, to enhance the identification of needs and delivery of services. The City's Community Development Services Department partners with multiple organizations in assessing and meeting local needs. The local institutional delivery system is well coordinated to address homeless, housing, non-housing and special needs. The private and public organizations listed in section SP-40 coordinate with the City, and other entities, in the identification, needs assessments and delivery of program assistance. The City also is member of the Community Partnership Board, a coalition of approximately 80 agencies service the health and human services needs of Bryan-College Station. Collectively, the local institutional delivery system is well coordinated and very effective in addressing local needs, providing information and referral services, and minimizing

duplication of services

Actions planned to enhance coordination between public and private housing and social service agencies

The City of Bryan Community Development Department actively collaborates with a wide network of public and assisted housing providers, as well as health and human service providers in the planning and implementation of its CP plan process. In this planning cycle, the City consulted local, regional, and state entities involved in housing and supportive services (see: Summary of Citizen Participation Process and Consultation Process). Public outreach efforts included online surveys to gather input on needs and priorities for future HUD funded activities.

The Community Development Department also participates in multiple collaborative networks and coalitions that aim to improve service delivery and reduce duplication, including the Brazos Valley Coalition for the Homeless, where staff serve as active members. The Department also maintains coordination with the local public housing authority through regular reviews of budgets, construction efforts, and certification of consistency aligned with the City's annual and 5-year goals.

Also, the Bryan City Council delegates to the Community Development Advisory Committee (CDAC), the responsibility to review, advise, and recommend funding allocations and program details to Council and staff. The CDAC is an advisory committee comprised of seven council appointees that hold regular public meetings and required public hearings for federally funded activities. The City of Bryan also partners with the City of College Station to identify shared community needs and enhance regional efforts to improve quality of life.

Finally, city staff remain available to provide technical assistance and support to affordable housing initiatives, when appropriate, including CHDO development projects, Habitat for Humanity programs. Reinforcing the City's commitment to coordinated housing and service strategies.

Discussion:

Meeting obstacles, foster and maintaining affordable housing, reducing lead-based paint hazards, developing institutional structure, and enhancing coordination between local public and private housing and social service agencies are all advanced by the City's comprehensive network of partnering agencies. Agency resources are leveraged and duplication of services is avoided through a high level of coordination within the local housing and social service community. By these partnerships, 2020-24 Consolidated Plan priorities and 2020-21 Action Plan goals will be achieved.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

The following information provides details regarding the CDBG and HOME grant requirements. Information related to program income, percentage of LMI persons assisted, other investments, and information related to resale and recapture provisions of the city's housing programs. Any recent revisions, new programs, and other updates regarding clients, properties, and/or program guidelines have been reviewed and determined consistent with CDBG and HOME regulations and approved by City Council. Full program requirements are found and maintained in the City's Community Development Department's Policies and Procedures Manual, kept in the CD office location.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

- | | |
|---|---|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 0 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan. | 0 |
| 5. The amount of income from float-funded activities | 0 |
| Total Program Income: | 0 |

Other CDBG Requirements

1. The amount of urgent need activities	
2 The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit – A consecutive period of one, two, or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	95.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

- A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:
No other forms of investment are contemplated for the use of the HOME funds except as identified in Section 92.205.
- A description of the guidelines that will be used for resale or recapture of HOME funds when used for

homebuyer activities as required in 92.254, is as follows:

Corresponding with HOME funded Homebuyers Assistance of up to \$24,999 or less per purchase/client, the City will require a deferred loan with a 5-year owner-occupancy requirement and secured by a note and recorded deed of trust. Recapture of the amount of assistance provided with HOME funds will be required upon resale, failure to maintain as homestead, or transfer of ownership during the affordability period; to the extent proceeds are available from any sale. The HOME investment subject to recapture is based on the amount of HOME assistance that enabled the homebuyer to buy the dwelling unit. This is also the amount upon which the affordability period is based. This includes any HOME assistance that reduced the purchase price from fair market value to an affordable price, but excludes the difference between the total actual cost plus the market cost of producing the unit and the market value of the property (i.e., the development subsidy). The recaptured funds must be used to carry out HOME eligible activities.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Where acquisition is used in support of program efforts to develop new affordable housing for future homebuyers, the resale/recapture and affordability guidelines listed above will govern. For non-down-payment activities where acquisition is involved, resale provisions restricting rents to affordable levels and occupancy to eligible households will be required through a recorded Land Use Restriction Agreement (LURA). Likewise, HOME Program required resale/recapture requirements for new developments will have a term of twenty years, and rehabilitated rental developments will have a term of five to fifteen years based upon the amount of the HOME subsidy in the development – all enforced by a recorded LURA.

Additionally, the City acknowledges the most recent HOME Final Rule and has current policies and procedures in place to address any new requirements.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City does not plan to use HOME funds to refinance existing debt on multi-family housing.

Appendix - Alternate/Local Data Sources

1	Data Source Name Housing Condition Survey and Analysis
	List the name of the organization or individual who originated the data set. City of Bryan Community Development Department in partnership with the Brazos County Appraisal District.
	Provide a brief summary of the data set. Brazos County Appraisal District (BCAD) data sets sorted to determine number and locations of substandard residential units. Sorting was accomplished using a variety of available property characteristics from BCAD data, to include: quality of construction, year built, depreciation factors and maintenance or upgrade adjustments.
	What was the purpose for developing this data set? To determine number and locations of substandard residential units so as to more accurately identify needs and create strategies for the 2025-29 Consolidated Plan.
	Provide the year (and optionally month, or month and day) for when the data was collected. September 2024.
	Briefly describe the methodology for the data collection. Brazos County Appraisal District (BCAD) data sets were sorted using applicable property characteristics (e.g., quality of construction, year built, depreciation factors and maintenance or upgrade adjustments). A determination was made as to the categories and values assigned to properties and, based on those results, which properties were likely substandard. Results were then calculated and tested to ensure accuracy
	Describe the total population from which the sample was taken. Single family residential and residential rental properties within the Bryan city limits.
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. Approximately 25,000 single family and multi-family residential units located within the Bryan city limits.
2	Data Source Name Community Needs Assessment (Client Questionnaire)
	List the name of the organization or individual who originated the data set. The survey was made available to the public in public meetings and online by the City of Bryan Community Development Department staff.

	<p>Provide a brief summary of the data set.</p> <p>Bryan CD staff conducted a needs assessment survey of residents to help identify needs and to set priorities for the use of CDBG and HOME funds. The 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.</p>
	<p>What was the purpose for developing this data set?</p> <p>Development of the data provides the CD staff, Community Development Advisory Committee, and Bryan City Council public input to complement other available data in the development of the 2025-29 Consolidated Plan and 2025 Annual Action Plan.</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>Data was collected during February and March of 2025.</p>
	<p>Briefly describe the methodology for the data collection.</p> <p>The Community Needs Assessment (Client Questionnaire) available in public meetings and also available online on the City of Bryan's website. Various types of notices and announcement methods were employed to raise public awareness of the survey (public service announcements, radio and television advertisements, etc.)</p>
	<p>Describe the total population from which the sample was taken.</p> <p>All Bryan citizens were encouraged to participate in the survey.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>The Community Needs Assessment Survey received approximately 160 responses. Demographics were not collected on the questionnaire.</p>
3	<p>Data Source Name</p> <p>Service Provider Survey</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>The survey was made available to local public service assistance providers in an online survey.</p>
	<p>Provide a brief summary of the data set.</p> <p>Bryan staff conducted a priority needs assessment survey of local service providers to help identify needs of agency clients and to set priorities for the use of CDBG and HOME funds. The survey asked questions regarding primary, personal, health, and family needs.</p>
	<p>What was the purpose for developing this data set?</p> <p>Development of the data provides the CD staff, Community Development Advisory Committee, and Bryan City Council public input to complement other available data in the development of the 2025-29 Consolidated Plan and 2025 Annual Action Plan.</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>Data was collected in March and April 2025.</p>

	<p>Briefly describe the methodology for the data collection.</p> <p>The Service Provider Survey was collected through online surveys.</p>
	<p>Describe the total population from which the sample was taken.</p> <p>Approximately 20 local public service assistance providers representatives.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>The Service Provider Survey had approximately 20 agency representatives filled out the online survey. Demographics were not collected on the attendees.</p>
4	<p>Data Source Name</p> <p>Medical Needs Focus Group</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>This workshop was made available to medical providers in the Bryan-College Station area. Was hosted jointly by the City of Bryan Community Development Department and College Station Community Development staff.</p>
	<p>Provide a brief summary of the data set.</p> <p>Bryan and College Station CD staff conducted the Medical Needs Focus Group to help identify and prioritize needs and to set priorities for the use of CDBG and HOME funds. This focus group helped us get a better understanding of medical needs in our area.</p>
	<p>What was the purpose for developing this data set?</p> <p>Development of the data provides the CD staff, Community Development Advisory Committee, and Bryan City Council public input to complement other available data in the development of the 2025-29 Consolidated Plan and 2025 Annual Action Plan.</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>Data was collected during February 2025</p>
	<p>Briefly describe the methodology for the data collection.</p> <p>Was a focus group at the City of College Station City Hall.</p>
	<p>Describe the total population from which the sample was taken.</p> <p>All public service agency providers were encouraged to participate in the survey.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>There were about 15 medical providers in attendance.</p>
5	<p>Data Source Name</p> <p>2025 Point-In-Time Homeless Count Data</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>Brazos Valley Coalition for the Homeless (BVCH)</p>

	<p>Provide a brief summary of the data set.</p> <p>2025 Point-in-Time data provides a snap-shot of persons in the community experiencing homelessness and defines and surveys both sheltered and unsheltered homeless families and individuals in the region. It was collected on 2025 by members of the Brazos Valley Coalition for the Homeless.</p>
	<p>What was the purpose for developing this data set?</p> <p>HUD requires all Continuums of Care to collect data each year on homelessness at a single point-in-time during the last week of January. This information is used by the local homeless providers and other partnering service agencies for development of short- and long-term strategies to alleviate homelessness and meet currently homeless health and human service needs.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Information was collected throughout the service area of the BVCH, which includes a seven-county region (Brazos, Burleson, Grimes, Robertson, Madison, Leon, and Milam counties).</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>The data represents a point-in-time count, conducted on January 23, 2025.</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete.</p>
6	<p>Data Source Name</p> <p>2025 Brazos Valley CoC Inventory List</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>Brazos Valley Coalition for the Homeless (BVCH).</p>
	<p>Provide a brief summary of the data set.</p> <p>This inventory list of homeless facilities is categorized by emergency, transitional, and permanent housing beds.</p>
	<p>What was the purpose for developing this data set?</p> <p>The goal was to provide an up-to-date and accurate assessment of housing resources available to area homeless populations.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>The data is comprehensive, and based on eCon Suite guidelines and parameters.</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>This is updated information for 2025.</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete.</p>

7	Data Source Name
	The Real Estate Center Housing Affordability Index
	List the name of the organization or individual who originated the data set.
	The Real Estate Center at Texas A&M.
	Provide a brief summary of the data set.
	An analysis of the ratio of median family income to the income required to qualify for a fixed-rate mortgage loan at an 80% loan to value to purchase the median-priced home; the higher the affordability index, the more affordable the Multiple Listing Service (MLS) Area.
	What was the purpose for developing this data set?
	To analyze the affordability of local housing, based on local housing cost and the area median incomes. The purpose was to identify the needs of low- and moderate-income households so as to better determine the programmatic needs of clients and to allow the City's CDBG and HOME program staff and other local non-profit and for-profit housing partners in meeting affordable housing needs locally.
Provide the year (and optionally month, or month and day) for when the data was collected.	
2020-2024	
Briefly describe the methodology for the data collection.	
The data was collected by the Real Estate Research Center through data collected through multiple sources, to include: Census data, federal and state labor agencies, municipalities, lenders, realtors, associations, and appraisal districts.	
Describe the total population from which the sample was taken.	
The data includes data on the population of Bryan, College Station, Brazos County, and Texas.	
Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.	
The demographics, units of measure, numbers of respondents, or data received were not available to the City of Bryan.	
8	Data Source Name
	Housing Authority of the City of Bryan
	List the name of the organization or individual who originated the data set.
	Bryan Housing Authority (BHA).
	Provide a brief summary of the data set.
Updates to the default populated data for the BHA public housing unit inventory	
What was the purpose for developing this data set?	
To ensure an accurate accounting of the current public housing units and residents.	

	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>The updated public housing unit and resident data was requested and received directly from the BHA and accounts for all of their properties in the City of Bryan at five separate locations.</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>Program year 2024-25.</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>

CITY OF BRYAN CITIZEN PARTICIPATION PLAN

The City of Bryan Community Development (CD) Department's ***Citizen Participation Plan*** is designed to afford all citizens of Bryan, including low- and moderate-income citizens, the opportunity to comment on the Consolidated Plan, Annual Action Plans, Consolidated Annual Performance and Evaluation Reports, and community development procedures, and specific project goals and funding. Citizens and organizations can provide comments on activities to the Community Development Office, 1803 Greenfield Plaza, P.O. Box 1000, Bryan, TX 77805. The phone number for CD is 979-209-5175. A messaging service is available for calls after normal business hours and messages may be sent to the CD Dept. at: communitydevelopmentweb@bryantx.gov

SECTION I. ENCOURAGING PARTICIPATION

The City of Bryan will, as necessary, amend the citizen participation plan to comply with provisions of this section.

The City of Bryan Citizen Plan will provide for and encourage citizens to participate in the development of the Consolidated Plan, Annual Action Plans, any substantial amendments to the plans, and the end-of-year Consolidated Annual Performance and Evaluation Reports.

The ***Citizen Participation Plan*** will encourage participation by low- to moderate-income persons, particularly those living in slum and blighted area and in areas where CDBG and/or HOME grant funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods, as defined by the community development target areas. The City of Bryan will also take whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities (see *SECTION V. PUBLIC HEARINGS* following).

The City of Bryan shall encourage, in conjunction with consultation with public housing authorities, the participation of residents of public and assisted housing developments, in the process of developing and implementing the Consolidated Plans and Annual Action Plans, along with other low-income residents of targeted revitalization areas in which the developments are located. The City of Bryan shall make an effort to provide information available at the annual public hearings required under the Consolidated Plan public participation requirements.

The City of Bryan will provide citizens with a reasonable opportunity to comment on this citizen participation plan and on substantial amendments to the citizen participation plan, and will make the citizen participation plan public; The City of Bryan Citizen Participation Plan will be in a format accessible to persons with disabilities, upon request.

SECTION II. MINIMUM REQUIREMENTS

The City of Bryan Citizen Participation Plan will require that, before the City of Bryan adopts Consolidated Plans or Annual Action Plans, it will make available to citizens, public agencies, and other interested parties information that includes the amount of assistance the City of Bryan expects to receive and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income. The City of Bryan Citizens Participation Plan will also set forth the City of Bryan's plans to minimize displacement of persons and to assist any persons displaced. The City of Bryan Citizen Participation Plan ensure the City informs the public on when and how the jurisdiction will make this information available.

The City of Bryan Citizen Participation Plan requires the City of Bryan to publish the proposed Consolidated Plans or Annual Action Plans in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The City of Bryan Citizen Participation Plan sets forth how the City of Bryan will publish plans and reports and give reasonable opportunity to examine the contents of the proposed plans and reports.

The City of Bryan will provide a reasonable number of free copies of the plans and reports to citizens and groups request such.

The City of Bryan Citizen Participation Plan will provide for at least one public hearing during the development phase of the Consolidated Plans or Annual Action Plans.

The City of Bryan Citizens Participation Plan shall require the City of Bryan to consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the final Consolidated Plans or Annual Action Plans. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final Consolidated Plan or Annual Action Plan.

SECTION III. AMENDMENTS

The City of Bryan Citizen Participation Plan will specify the criteria the City of Bryan will use for determining what changes in the City's planned or actual activities constitute a substantial amendment to the Consolidated Plans or Annual Action Plans. It will include criteria for changes in the use of HOME and/or CDBG grant funds from one eligible activity to another.

The City of Bryan Citizen Participation Plan will provide citizens with reasonable notice and an opportunity to comment on substantial amendments. The City of Bryan Citizen Participation Plan will state how reasonable notice and an opportunity to comment will be given. The City of Bryan Citizen Participation Plan requires a period, not less than 30 days, to receive comments on the substantial amendment before an amendment is implemented.

The City of Bryan Citizen Participation Plan requires that the City of Bryan consider any comments or views of citizens received in writing, or orally at public hearings, if any, in preparing the substantial amendment of Consolidated Plans or Annual Action Plans. A summary of these comments or views and a summary of any comments of views not accepted and the reasons there of shall be attached to the substantial amendment to the Consolidated Plan or Annual Action Plan.

SECTION IV. PERFORMANCE REPORTS

The City of Bryan Citizen Participation Plan ensures citizens with reasonable notice and opportunity to comment on the Consolidated Annual Performance and Evaluation Report (CAPER). The Bryan Citizen Participation Plan states how reasonable notice and an opportunity to comment is provided. The Citizen Participation Plan provides a period of not less than 15 days to receive comments on the CAPER that is to be submitted to HUD before its submission.

The City of Bryan Citizen Participation Plan requires the City of Bryan to consider any citizen comments or views received in writing, email, or verbally at a public hearing in preparation of the CAPER. A summary of these comments or views will be attached to the performance report.

SECTION V. PUBLIC HEARINGS

The City of Bryan Citizens Participation Plan requires at least two public hearings per year be held to obtain citizen's input and to respond to proposals and questions. Hearings will be conducted at a minimum of two different stages of the program year. The hearings will address housing and community development needs, development of proposed activities, and review of program performance. At least one of these hearings will be held before the proposed Consolidated Plan or Annual Action Plan is published for comment to obtain views of citizens on housing and community development needs, including priority on housing community development needs.

The City of Bryan Citizen Participation Plan will state how and when adequate advance notice will be given to citizens of each hearing with sufficient information published about the subject of the hearing to permit informed comment. The City of Bryan Citizen Participation Plan will provide that hearings be held at times and locations convenient to potential and actual beneficiaries and with accommodation for persons with disabilities. The City of Bryan Citizen Participation Plan will specify how it will meet these requirements.

In the event of local, state, or national environmental, economic, health, or other unforeseen calamities, the city may elect to hold online and/or broadcast "Virtual Public Hearings" (VPH) to ensure opportunities for citizens to provide comment and input on Consolidated Plans, Annual Action Plans, Consolidated Annual Performance and Evaluation Reports, plan amendments, and any other publication requiring public input and/or review. The public will be notified of VPHs through traditional public notice methods (newspaper notices, radio, television, internet, etc.), and accommodations for other means of participating and commenting will be provided for those lacking computer, internet, phone, or other equipment or service requirements.

The City of Bryan Citizen Participation Plan will identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English residents can be reasonably expected to participate.

SECTION VI. MEETINGS

The City of Bryan Citizen Participation Plan will provide citizens with reasonable and timely access to local meetings.

SECTION VII. AVAILABILITY TO THE PUBLIC

The City of Bryan Citizen Participation Plan will provide that Consolidated Plans or Annual Action Plans, as adopted, substantial amendments, and Consolidated Annual Performance and Evaluation Reports will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request. The City of Bryan Citizen Participation Plan will state how these documents will be made available to the public.

The City of Bryan Citizen Participation Plan documents previously listed will be made accessible to the public. The documents will be available in English and non-English speakers may request translations of any public document. Access to digital copies will be available on the City of Bryan Community Development Website. For physical copies, contact the City of Bryan Community Development Office at 979-209-5175.

SECTION VIII. ACCESS TO RECORDS

The City of Bryan Citizen Participation Plan will require the City of Bryan to provide citizens, public agencies, and other interested parties with reasonable and timely access to information and a record relating to the City of Bryan's Consolidated Plan and the City's use of assistance under the programs covered by this part during the preceding five years.

SECTION IX. TECHNICAL ASSISTANCE

The City of Bryan Citizen Participation Plan will provide for technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance. Under any of the programs covered by the Consolidated Plan, with the level and type of assistance determined by the City of Bryan.

SECTION X. COMPLAINTS

The City of Bryan Citizen Participation Plan will describe the City of Bryan's appropriate and practicable procedures to handle complaints from citizens related to the Consolidated Plan, Annual Action Plan, substantial amendments, and Consolidated Annual Performance and Evaluation Report.

SECTION XI. USE OF PLAN

The City of Bryan will follow its citizen participation plan as a guide to include all citizens of Bryan in the planning and implementation process for the City of Bryan's Consolidated Plan for 2025-2029. The citizen participation plan also is designed to afford all citizens of Bryan, including low- and moderate-income citizens, the opportunity to comment on the Consolidated Plan, Annual Action Plans, Consolidated Annual Performance and Evaluation Reports, and community development procedures, and specific project goals and funding.

SECTION XII. JURISDICTION RESPONSE

The requirements for citizen participation will not restrict the responsibility for the development and execution of its Consolidated Plan.

SECTION XIII. BRYAN LOCAL DEFINITION OF SUBSTANTIAL CHANGE TO COMMUNITY DEVELOPMENT CONSOLIDATED PLAN OR ANNUAL ACTION PLAN

Amendments to Consolidated Plans or Annual Action Plans require notice to the public and opportunity for the public to comment.

Amendments are required whenever an activity is deleted or when one is added as required by HUD regulatory requirements,

Amendments are also required when there will be a substantial change in the purpose, scope, location or beneficiaries of an activity.

For the City of Bryan CDBG and HOME grant programs, a substantial change is defined as one in which:

1. More than 10% if the CDBG or HOME annual allocation is directed to a different activity than originally allocated to in the Annual Action Plan.
2. A change in use of funds from operational to rehabilitation/construction/or vice versa.
3. A change in national objective being addressed.

Prior to amending its Consolidated Plan or Annual Action Plan, the City shall provide citizens with reasonable notice of, and opportunity to comment on, such proposed changes in its use of funds. The City will consider any such comments and, if it deems appropriate, modify the changes. The City will make available to the public, and will submit to HUD, a description of any changes adopted. A letter transmitting such description to the U.S. Dept. of HUD will be signed by the Mayor or his/her designee.

DRAFT



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 in our affordable housing programs through a specific set of steps that the City and participating owners will follow. 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 placing a special news release in both *La Voz* and *The Eagle*.
 - Inform potential tenants or purchasers by providing informational materials about the program to the B/CS Association of Realtors for membership distribution.
 - Inform owners, builders and developers by providing information materials to the Home Builders Association for membership distribution to those who may participate in the City programs.
- The City will provide a copy of the Affirmative Marketing Policy to all builders/developers participating in City housing programs.

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

All housing developed through the City of Bryan's Affordable Housing Programs will be marketed using the following guidelines.

The City of Bryan will require participating property owners to contact city staff when they know a property is to become available. We will advise owners to give us this information as close as 30 days prior to the upcoming vacancy as possible.

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.
- We will advertise after special outreach efforts to inform persons otherwise not likely to apply proves unsuccessful.
- Providing public notice at the Community Development Advisory Committee (CDAC) meeting.

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 Department will undertake special outreach methods as follows:

- For the predominantly African American, the City of Bryan will contact the 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.
- For the predominantly Hispanic group, the City of Bryan will contact churches serving the Hispanic community in the neighborhood of the development and the local groups in order to request that these organizations inform members of their organizations about the availability of newly developed housing units and housing assistance programs.
- To reach Spanish-speaking residents more effectively, the City will also advertise through Spanish-language media outlets, including local newspaper such as *La Voz*.

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.

We will also require that organizations receiving federal housing funds through the Community Development Department to keep a record 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 if 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:

- Examine whether or not persons from the African American and Hispanic groups in our area applied for or became tenants or owners of units that were affirmatively marketed. If we find that they are represented, we will assume our procedures were effective.

If one or more such groups are not represented, we will review the procedures to determine what changes, if any, might be made to make the affirmative marketing efforts more effective. The City of Bryan will take corrective actions if owners fail to carry out procedures required under this plan. If, after repeated notification, the owners continue to fail to meet the affirmative marketing requirements, the City may disqualify an owner from future participation in any of the City of Bryan's housing programs.

The City of Bryan 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.

Affirmative Marketing Techniques

Owners, builders and developers offering properties assisted by the City of Bryan Community Development Department are required to comply with the City's affirmative marketing requirement on all units sold under the program. The Department of Housing and Urban Development has set fourth 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, etc. 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 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
4001 E. 29th Street Suite 180
Bryan, Texas 77802

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

Housing Authority of Bryan
1306 Beck Street
Bryan, Texas 77803

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

Lone Star Legal Aid
1714 E 29th Street
Bryan, TX 77802

Brazos Valley Community Action Programs
4001 E.29th Suite 175
Bryan, TX 77802

Habitat for Humanity
119 Lake Street
Bryan, Texas 77801

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

Brazos Interfaith Immigration Network
2500 S College Ave.
Bryan, TX 77801

SECTION 3 COMPLIANCE PLAN
For Applicable City of Bryan Programs and Projects
Effective 5-14-2025

Section 3 is a provision of the Housing and Urban Development Act of 1968. Section 3 is intended to ensure that when employment or contracting opportunities are generated because a federally-funded project necessitates the employment of additional persons or the awarding of contracts for work, preference must be given to low- and very low-income persons or business concerns residing in the community where the project is located. This plan incorporates the provisions of the HUD Section 3 Final Rule, effective November 30, 2020 and published at 24 CFR Part 75. This plan applies to the department as a recipient of HUD funds for any projects, in which the HUD investment per project is \$200,000 or more. The HUD-Published FAQ's of March 25, 2021, and as may be amended from time to time, are included as Exhibit A, and are incorporated by reference as part of this plan.

I. PURPOSE

The purpose of this Plan is to provide employment and business opportunity for businesses and lower income persons who are residents of the Bryan – College Station MSA referred to as the Section 3 Area under the Community Development Block Grant Program, by setting forth procedures to be implemented by contractors and subcontractors to assure compliance with Section 3 of the Housing and Urban Development Act, as defined in 24 CFR part 75 (for project receiving federal assistance of \$200,000 or more).

A. Definitions:

1. Section 3-Covered Project - A Section 3-Covered project involves the construction or rehabilitation of housing (including reduction of lead-based paint hazards), or other public construction such as street repair, sewage line repair or installation, updates to building facades, etc. which is funded by HUD, and in which the project financing amount is \$200,000 or more in covered funds. The threshold is \$100,000 where the assistance is from the Lead Hazard Control and Healthy Homes programs.
2. Section 3 Business Concern - Section 3 business concerns are businesses that can provide evidence that they meet one of the following, documented within the last six (6)- month period:
 - (i) It is at least 51 percent owned and controlled by low- or very low-income persons;
 - (ii) Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers; or
 - (iii) It is a business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.
 - (iv) The status of a Section 3 business concern shall not be negatively affected by a prior arrest or conviction of its owner(s) or employees.
 - (v) Nothing in this part shall be construed to require the contracting or subcontracting of a Section 3 business concern. Section 3 business concerns are not exempt from meeting the specifications of the contract.
3. Section 3 Worker - Any worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:
 - (i) The worker's income for the previous or annualized calendar year is below the income limit established by HUD.
 - (ii) The worker is employed by a Section 3 business concern.
 - (iii) The worker is a YouthBuild participant.
 - (iv) The status of a Section 3 worker shall not be negatively affected by a prior arrest or conviction.

- (v) Nothing in this part shall be construed to require the employment of someone who meets this definition of a Section 3 worker. Section 3 workers are not exempt from meeting the qualifications of the position to be filled.
4. Targeted Section 3 Worker: Targeted Section 3 worker. A Targeted Section 3 worker for housing and community development financial assistance means a Section 3 worker who is:
- (i) A worker employed by a Section 3 business concern; or
 - (ii) A worker who currently fits or when hired fit at least one of the following categories, as documented within the past five years:
 - (iii) Living within the service area or the neighborhood of the project, as defined in §75.5; or
 - (iv) A YouthBuild participant.
5. Race and Gender Neutral - Section 3 is both race and gender neutral. The preferences provided under this regulation are based on income-level and location. The Section 3 regulations were designed to encourage recipients of HUD funding to direct new employment and contracting opportunities to low-income residents, and the businesses that employ these persons, within their community regardless of race and/or gender.
6. Compliance: The department shall maintain records demonstrating compliance, provide any information deemed appropriate to the applicable HUD program office of compliance, work to meet HUD-established benchmarks, report as required, and maintain a certification process for Section 3 business concerns. Applicable benchmarks are:
- **25%** or more of the total number of labor hours worked by all workers on a Section 3 project are Section 3 workers; AND
 - **5%** or more of the total number of labor hours worked by all workers on a Section 3 project are Targeted Section 3 workers, as defined in 24 CFR § 75.21 (This 5% amount is included in the 25% “all Section 3 Workers” category above.)
7. Reporting - a) Reporting of labor hours. (1) For Section 3 projects, recipients must report at least quarterly in a manner prescribed by HUD:
- (i) The total number of labor hours worked;
 - (ii) The total number of labor hours worked by Section 3 workers; and
 - (iii) The total number of labor hours worked by Targeted Section 3 workers.
- (2) Section 3 workers' and Targeted Section 3 workers' labor hours may be counted for five years from when their status as a Section 3 worker or Targeted Section 3 worker is established pursuant to §75.31.
- (3) The labor hours reported under paragraph (a)(1) of this section must include the total number of labor hours worked on a Section 3 project, including labor hours worked by any subrecipients, contractors and subcontractors that the recipient is required, or elects pursuant to paragraph (a)(4) of this section, to report.
- (4) Recipients reporting under this section, as well as subrecipients, contractors and subcontractors who report to recipients, may report labor hours by Section 3 workers, under this section, and labor hours by Targeted Section 3 workers, under this section, from professional services without including labor hours from professional services in the total number of labor

hours worked under this section. If a contract covers both professional services and other work and the recipient or contractor or subcontractor chooses not to report labor hours from professional services, the labor hours under the contract that are not from professional services must still be reported.

(5) Recipients may report their own labor hours or that of a subrecipient, contractor, or subcontractor based on the employer's good faith assessment of the labor hours of a full-time or part-time employee informed by the employer's existing salary or time and attendance-based payroll systems, unless the project or activity is otherwise subject to requirements specifying time and attendance reporting.

(b) Additional reporting if Section 3 benchmarks are not met. If the recipient's reporting under paragraph (a) of this section indicates that the recipient has not met the Section 3 benchmarks described in §75.23, the recipient must report in a form prescribed by HUD on the qualitative nature of its activities and those its contractors and subcontractors pursued. Such qualitative efforts may, for example, include but are not limited to the following:

- (1) Engaged in outreach efforts to generate job applicants who are Targeted Section 3 workers.
- (2) Provided training or apprenticeship opportunities.
- (3) Provided technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).
- (4) Provided or connected Section 3 workers with assistance in seeking employment including: drafting resumes, preparing for interviews, and finding job opportunities connecting residents to job placement services.
- (5) Held one or more job fairs.
- (6) Provided or referred Section 3 workers to services supporting work readiness and retention (e.g., work readiness activities, interview clothing, test fees, transportation, child care).
- (7) Provided assistance to apply for/or attend community college, a four-year educational institution, or vocational/technical training.
- (8) Assisted Section 3 workers to obtain financial literacy training and/or coaching.
- (9) Engaged in outreach efforts to identify and secure bids from Section 3 business concerns.
- (10) Provided technical assistance to help Section 3 business concerns understand and bid on contracts.
- (11) Divided contracts into smaller jobs to facilitate participation by Section 3 business concerns.
- (12) Provided bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.

(13) Promoted use of business registries designed to create opportunities for disadvantaged and small businesses.

(14) Outreach, engagement, or referrals with the state one-stop system as defined in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.

(c) Reporting frequency. Unless otherwise provided, recipients must report annually to HUD under paragraph (a) of this section, and, where required, under paragraph (b) of this section, on all projects completed within the reporting year in a manner consistent with reporting requirements for the applicable HUD program.

- B. The following clause shall be included (verbatim) in bid documents and all contracts for projects in which the amount of federal investment exceeds \$200,000.

24 CFR §75 Section 3 Clause

All section 3 covered contracts shall include the following clause (referred to as the section 3 clause):

A. The work to be performed under this contract is subject to the requirements of section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (section 3). The purpose of section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects covered by section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are recipients of HUD assistance for housing.

B. The parties to this contract agree to comply with HUD's regulations in 24 CFR part 75, which implement section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the part 75 regulations.

C. The contractor agrees to send to each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the contractor's commitments under this section 3 clause, and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the section 3 preference, shall set forth minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.

D. The contractor agrees to include this section 3 clause in every subcontract subject to compliance with regulations in 24 CFR part 75, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this section 3 clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR part 75. The contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR part 75.

E. The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR part 75 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR part 75. The status of a Section 3 worker shall not be negatively affected by a prior arrest or conviction.

F. Noncompliance with HUD's regulations in 24 CFR part 75 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.

G. With respect to work performed in connection with section 3 covered Indian housing assistance, section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450e) also applies to the work to be performed under this contract. Section 7(b) requires that to the greatest extent feasible (i) preference and opportunities for training and employment shall be given to Indians, and (ii) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned Economic Enterprises. Parties to this contract that are subject to the provisions of section 3 and section 7(b) agree to comply with section 3 to the maximum extent feasible, but not in derogation of compliance with section 7(b).

C. UTILIZATION OF SECTION 3 AREA RESIDENTS AND BUSINESSES

All contractors subject to this Section 3 regulation should consider the following to meet benchmark for Section 3 labor hours. To the greatest extent feasible:

1. Each covered employer can utilize lower income project area residents as trainees, and/or;
2. Employ lower income project area residents by projecting an estimate of the number of Section 3 hours necessary for the project, and identifying the number and types of positions not currently occupied by regular, permanent employees and establishing a goal of positions to be filled by lower income residents of the Section 3 covered project area.
3. Employers are encouraged to recruit Section 3 employees through: local advertising media, signs placed at the proposed site for the project, and community organizations and public or private institutions operating within or serving the project area such as Employment or Workforce Commissions, Rehabilitation Commissions, Manpower Services, Community Action Agencies, Commission for the Blind, Veteran's Outreach Programs, or similar sources.

II. CONTRACTOR OR SUBCONTRACTOR AFFIRMATIVE ACTION PLAN

All competitive bidders and negotiated contractors, subject to 24 CFR Part 75 regulations (contracts over \$200,000) will submit to the City of Bryan documentation necessary to verify compliance with Section 3 requirements, including the following forms:

SECTION 3 BUSINESS CERTIFICATION

AND NARRATIVE SECTION 3 ACTION PLAN

The work to be performed under bids on projects assisted under programs providing direct federal financial assistance from the Department of Housing and Urban Development (HUD) **are subject to the requirements of Section 3** of the Housing and Urban Development Act of 1968.

Section 3 worker - A “section 3 worker” is one who within the previous 5 years was documented to be: 1) a public housing or Section-8 (HUD) resident; or 2) a low- or very low-income person residing in the College Station-Bryan Metropolitan Statistical Area (MSA), 3) Employed by a Section 3 business concern, 4) A YouthBuild participant. The preferences provided under this regulation are based on income-level and location, and are race and gender-neutral. The following income limits apply to the households of those considered Section 3 residents based upon income. The income limit is based upon an individual household of one (1), regardless of actual household size:

2025-26 City of Bryan Income Limits for Consideration as Low to Moderate Income:

Household #	1	2	3	4	5	6	7	8
Max. Income 6-1-2024	\$49,600	\$56,650	\$63,750	\$70,800	\$76,500	\$82,150	\$87,800	\$93,500

Section 3 Business Concern - Section 3 business concerns are businesses which can provide evidence that they meet one of the following: 51 percent or more owned by low to very low-income persons or public housing or Section 8-assisted housing residents; or at least 75 percent of its labor hours in the prior three-month period performed by Section 3 workers

The Bidder represents and certifies as part of its bid that it **will comply** with the requirements of Section 3 in one of the following categories (**MUST CHECK ONE BOX ONLY**):

- ☐ **CATEGORY A SECTION 3 BUSINESS CONCERN (OWNERSHIP):**
51% or more of the business is owned by Section 3 Residents (low-income residents or residents of public or Section-8 assisted housing in the College Station-Bryan MSA (attach copy of the first and last page of current lease and documentation of business ownership, such as articles of incorporation, form 1099, tax return, bank statement, or other satisfactory proof of ownership, along with the attached Certification of Section 3 Business Ownership).
- ☐ **CATEGORY B SECTION 3 BUSINESS CONCERN (WORKFORCE):**
Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers (attach a list of all employees and prior 3-month work hours totals with Section 3 worker-designated employees so-designated, along with a Certification of Section 3 worker status from each Section 3 employee.)

SECTION 3 CERTIFICATION

Title 18, Section 1001 of the U.S. Code states that any person who knowingly and willingly makes or uses a document or writing containing any false, fictitious, fraudulent statement or entity, in any matter within the jurisdiction of any department or agency of the United States, shall be fined not more than \$10,000 or imprisoned for not more than five years, or both. The undersigned gives express consent to the City of Bryan to verify any information provided by the vendor within this Section 3 Business Certification Form.

CERTIFICATION

Certification – The information above is true and complete to the best of my knowledge and belief.

Signature

Date

(Print Name and Title)

CERTIFICATION OF SECTION 3 EMPLOYEES
(Used to Certify Category B Section 3 Business Concern –Workforce)

On this _____ day of _____, 20____ I, _____, hereby certify
Date Month Year Name of Employee

that I am an employee of: _____.
Name of Employer

And, I am **(Circle as many as apply)**:

- A. A resident of public or Section-8(HUD) housing** within the Bryan-College Station MSA (attach front and back page of lease).
- B. Currently Low income:** Employee's annual household income does not exceed 80% of the area median income based upon the following table (Annual income limit is based upon an individual household of one (1) member regardless of actual household size by projecting the worker's pay per hour on an annual basis, currently, or at time of hire if hired within the previous five (5) years):

2025-26 City of Bryan Income Limits for Consideration as Low to Moderate Income:

Household #	1	2	3	4	5	6	7	8
Max. Income 6-1-2025	\$49,600	\$56,650	\$63,750	\$70,800	\$76,500	\$82,150	\$87,800	\$93,500

- C. Previously employed by a Section 3 Business Concern**
- D. A YouthBuild Participant**
- E. Previously ANY of the above** based upon the table above, within 5 years prior to becoming employed by this employer

Title 18, Section 1001 of the U.S. Code states that any person who knowingly and willingly makes or uses a document or writing containing any false, fictitious, or fraudulent statement in any matter within the jurisdiction of any department or agency of the United States, shall be fined not more than \$10,000 or imprisoned for not more than five years, or both.

I certify that the above statements are true and correct. I understand that I may be required by program staff to provide income documentation, or some other form of documentation to prove I am a Section 3 employee at the time this certification is signed. I understand that any misstatement or falsification of information shall be grounds for revocation or termination of any Section 3 covered contract with the firm in which I am employed.

Signature of Section 3 Worker

Date

Printed Name of Section 3 Worker

CERTIFICATION OF SECTION 3 BUSINESS CONCERN OWNERSHIP
(Used to Certify Category A Section 3 Business Concern –Ownership)

On this _____ day of _____, 20____ I, _____, hereby certify
Date Month Year Name of Owner

that I am the/an owner of: _____ . (% Owner: _____ %)
Name of Business Percent of Ownership

I am able to document that during the previous six (6) months, I am/and/or business is: **(Circle as many as apply):**

- A. A resident of public (HUD) housing** within the Bryan-College Station MSA (attach front and back page of lease for each owner residing in public or Section-8 housing).
- B.** Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers.
- C. Currently Low income:** Owner's annual household income does not exceed 80% of the area median income based upon the following table:

2025-26 City of Bryan Income Limits for Consideration as Low to Moderate Income:

Household #	1	2	3	4	5	6	7	8
Max. Income 6-1-2025	\$49,600	\$56,650	\$63,750	\$70,800	\$76,500	\$82,150	\$87,800	\$93,500

Title 18, Section 1001 of the U.S. Code states that any person who knowingly and willingly makes or uses a document or writing containing any false, fictitious, or fraudulent statement in any matter within the jurisdiction of any department or agency of the United States, shall be fined not more than \$10,000 or imprisoned for not more than five years, or both.

I certify that the above statements are true and correct. I understand that I may be required by program staff to provide business primary or employee income documentation, or some other form of documentation to prove my company was a Section 3 Business Concern at the time this certification was signed. I understand that any misstatement or falsification of information shall be grounds for revocation or termination of any Section 3 covered contract with the firm in which I am employed.

Signature of Section 3 Business Owner

Date

Printed Name of Section 3 Business Owner

Section 3 Labor Hours Tracking Form

	Number	Percentage
Total Labor Hours	0	
Section 3 Worker Hours	0	
Targeted Section 3 Worker Hours	0	

Company:

Notes

All non-Section 3 worker labor hours for each company can be aggregated using "Non-Section 3 Workers" for the worker name. All Section 3 and Targeted Section 3 workers must be listed individually by name.

Only list the payroll numbers for weeks where work occurred. Do not include "no work" payrolls.

[illegible]

Analysis of Impediments to Fair Housing Choice 2025 Update

DRAFT

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

August 15, 2025



**City of Bryan
Community Development Department
1803 Greenfield Plaza
Bryan, TX 77802
(979) 209-5173**



Table of Contents

Introduction	Page 1
Study Description	Page 1
Study Observations and Recommendations Summary	Page 2
Research Objectives	Page 5
National, State, and Local Fair Housing Laws Summary	Page 5
Activities Utilizing CDBG to Affirmatively Further Fair Housing	Page 7
Affirmative Marketing Policy and Procedures	Page 7
Analysis of Local Housing Market and Business Practices	Page 9
Housing Availability and Affordability Profiles	Page 12
Fair Housing Complaint Profile	Page 14
Identification of Actions Initiated Within Jurisdiction	Page 16
Fair Housing Education Programs	Page 17
Appendices	
Appendix-A	City of Bryan Fair Housing Ordinance
Appendix-B	FFIEC HMDA List of Financial Institutions and Disposition of Loan Data
Appendix-C	TWC Public Information Discrimination Cases Request/Response
Appendix D	City of Bryan FOIA Discrimination Cases Request/Response

Introduction

AFFIRMATIVELY FURTHERING FAIR HOUSING: As part of its mission to administer federal grants, the City of Bryan Community Development Department has historically been required by Executive Order 12892 to affirmatively further fair housing in the programs and activities within its jurisdiction. HUD has recently published an interim Final Rule, effective April 2, 2025. This interim final rule revises HUD's regulation governing the Fair Housing Act's mandate that the Secretary administer HUD's program and activities in a manner that affirmatively furthers fair housing. This interim final rule returns to the original understanding of what the statutory AFFH certification was prior to 1994—a general commitment that grantees will take active steps to promote fair housing. Grantee AFFH certifications will be deemed sufficient provided they took any action during the relevant period rationally related to promoting fair housing, such as helping eliminate housing discrimination. This interim final rule does not, however, reinstate the obligation to conduct an Analysis of Impediments (AI) or mandate any specific fair housing planning mechanism; program participants must continue to affirmatively further fair housing as and to the extent required by the Fair Housing Act. Therefore, while this AI is no longer required, it serves as a record of how the City of Bryan works to combat housing discrimination 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:

https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint

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

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 2025-2029 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

Fair Housing Action Work Plan

This Fair Housing Work Plan provides a nexus between the City of Bryan Community Development Department (CDS) planned fair housing activities in the coming fiscal year (Program Year 2025), and the observations made in the City's 2025 Analysis of Impediments to Fair Housing Choice:

- **Observation 1:** There have been few fair housing complaints in the City of Bryan. For the 2020-2024 reporting period eleven (11) discrimination cases were provided to the City by HUD FHEO or the Texas Workforce Commission Civil Rights Division. 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 (63%), followed by family status and race (27% each), and National Origin (one; .9%). All cases were found to be without cause, withdrawn, settled, or dismissed.

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.

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

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

- **Observation 2:** Current limits on the numbers of unrelated occupants in a single family dwelling likely meet the test of reasonableness under the Fair Housing Act, although there is currently debate at the state level as to whether relatedness of occupants may be a discriminatory factor. Bryan also has Residential Conservation District R- NC zoning by individual neighborhoods (slightly more than 2,000 homes) which 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 and state of Texas legislation in relation to this zoning classification. 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. Source of Funds: Community Development Budget CDBG – Administrative funds.

- **Observation 3:** According to a review of HMDA data, Black applicants’ incidence of conventional loan denial is significantly higher than their percentage of their population as a whole.

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.

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

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

- **Observation 4:** 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.

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

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

Nexus to Affirmatively Further Fair and Affordable Housing

The City's Community Development Department (CDS) tracks staff time spent on FHEO activities so that an equivalent administrative or program delivery costs attributed to FHEO efforts can be quantified. Similar calculations are made regarding local public service and housing agency staff costs on FHEO related activities.

Actions to Affirmatively Further Fair Housing

Local FHEO activities that the city's CDS Office anticipates pursuing in the upcoming program year (PY2025-26) include the following:

- Provide notices and market affordable housing programs, properties, and services in Spanish language newspapers, radio, social media and/or television.
- Make Fair Housing and Affirmative Marketing information available to the public by holding multiple public hearings at public meetings during the program year.
- Hold all public meetings in ADA accessible facilities and ensure that housing projects comply with FHEO and ADA accessibility requirements.
- Make housing program information available to the disabled and non-English speakers by utilizing ADA accessible facilities and making translation and sign language services available.
- Make information on housing programs available to local churches, churches and civic groups that serve lower income persons and/or protected classes.
- When necessary, provide virtual/online opportunities for citizens to view and participate in public hearings.
- Market available affordable units to lower income persons and/or protected classes by providing information to local churches, civic groups and agencies that serve them.
- Host a Contractor's event promoting FHEO topics during the NCDA CDBG week.
- Distribute Fair Housing flyers at public events.

Previous and Ongoing 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.
- 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.
- Annual Public Hearings and Public Meetings were held providing information and requesting public comment on fair housing or related issues during the 2015-2019 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 citywide to eligible homebuyers by the Community Development 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 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 citywide basis.
- The City maintains an Affirmative Marketing Plan to directly market newly developed City-assisted housing units to minority groups least likely to apply.
- Annual Fair Housing outreach is conducted to participating contractors at events promoting FHEO topics during the NCDA CDBG week.
- Fair Housing materials and presentation is provided to Section 8 rental landlords during orientation in conjunction with the Brazos Valley Council of Governments Housing Choice Voucher Program.

Results

All City of Bryan-assisted developments are currently in compliance based upon Community Development 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. No complaints have been filed with the City Attorney's office under the City of Bryan Fair Housing Ordinance as of June 2, 2025. Zero (0) Needs Survey respondents stated they had experienced discrimination in Bryan.

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

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.

HUD Final Rule (Pending) Implementing the Fair housing Act's Disparate Impact Standard. The Act creates liability for practices with an unjustified discriminatory effect, even if those practices were not motivated by discriminatory intent. This rule will amend HUD's interpretation of the Fair Housing Act's disparate impact standard to better reflect the Supreme Court's 2015 ruling in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*

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

CDBG funding of fair housing activities by others. The City of Bryan accepts applications for CDBG funding from eligible nonprofit 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>
- Display of the Fair Housing Poster prominently throughout the Community Development office, and use of the Fair Housing logo on all promotional materials
- 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.

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.

Affirmative Marketing Policy and Procedures

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 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 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 homebuyers, 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 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 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.

Analysis of Local Housing Market and Business Practices

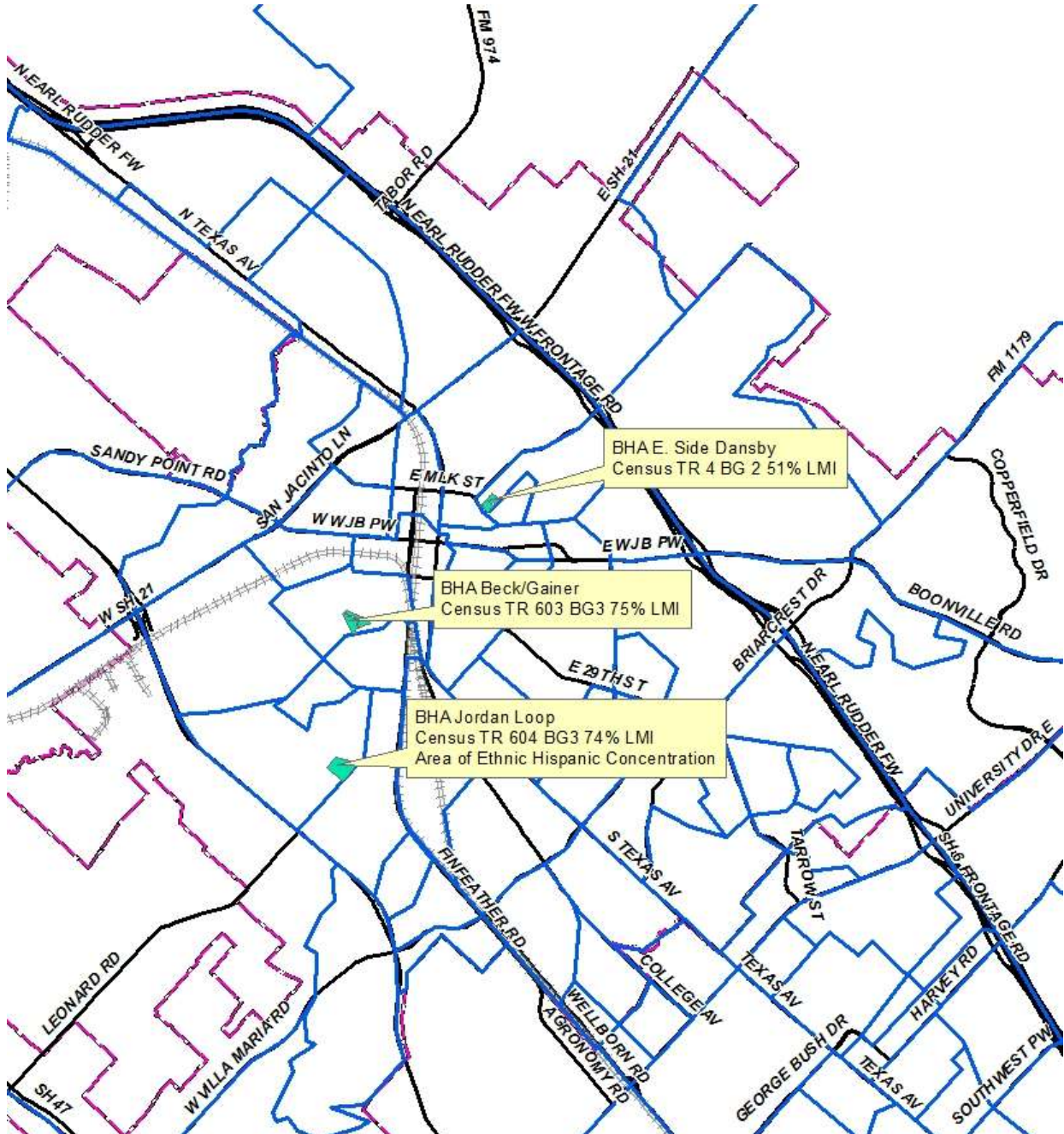
FFIEC HMDA Data Tables (SEE APPENDIX) for Disposition of Applications for Conventional, Government Insured, Refinance and Home Improvement Loans

Observation: HMDA data indicates that both Black and Hispanic applicants generally experience high denial rates as demonstrated in the appendix tables. Denials are primarily attributable to poor credit history ratings. Loan denial percentages, as compared to respective percentages of the population as a whole, are higher for Blacks and Hispanics, respectively. This data suggests that consumer credit counseling and homeowner education should continue to be a priority in the assistance provided by the city and other local housing assistance providers, and should be affirmatively marketed to minority populations.

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. There are 1,643 local vouchers, with 1,073 currently in use in Bryan. Voucher holders are well dispersed throughout the community.
- 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 areas of minority concentration. See below map:

Distribution of Public Housing

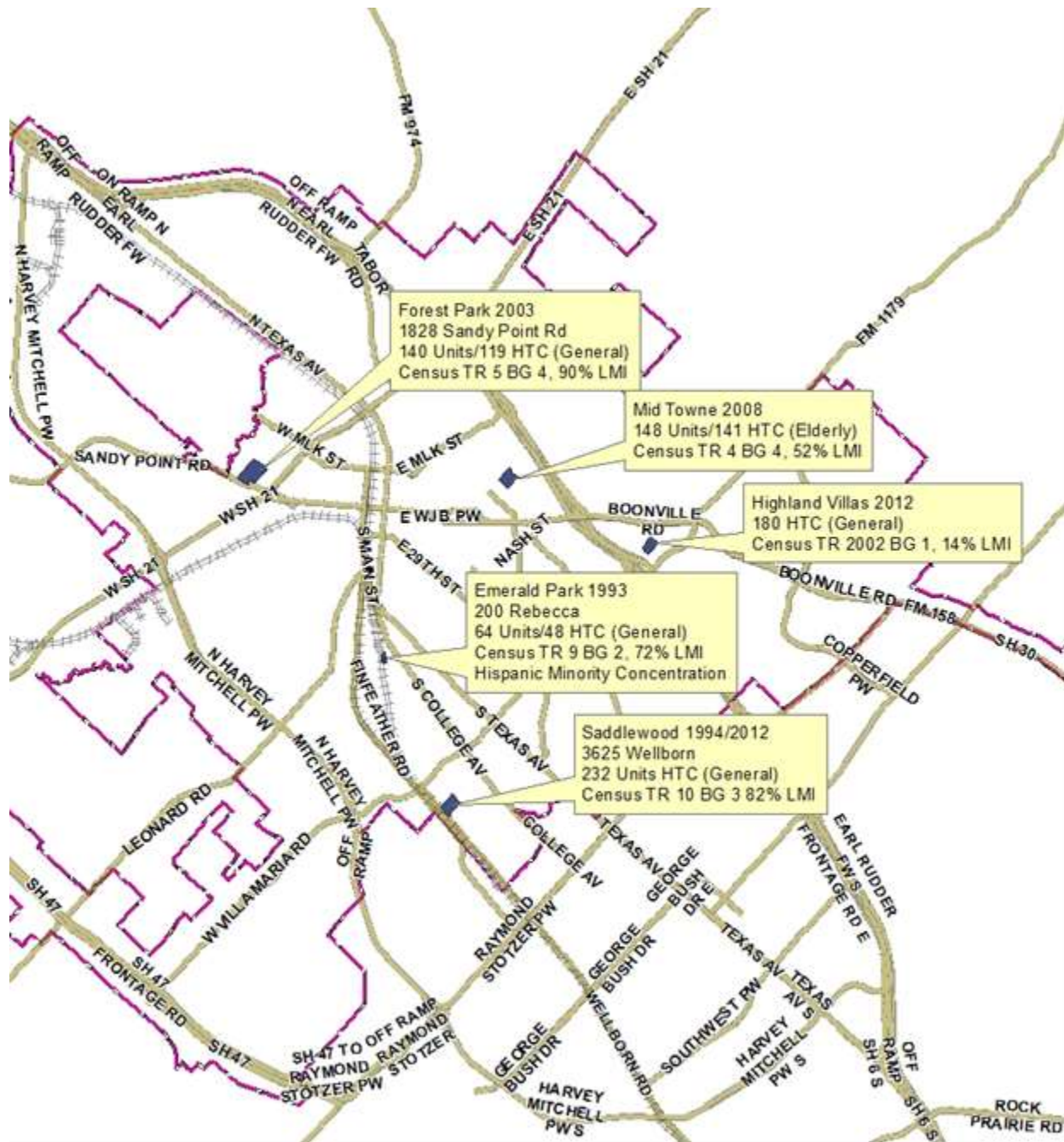


In light of the U.S. Supreme Court's Disparate Impact ruling, any future expansion or development at these sites must be further evaluated to determine the extent to which the development may disparately impact protected classes. New public housing may be required to be located in more affluent areas 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. Most fall within a low to moderate income area that is also an area of minority concentration. Mid Towne Manor (Formerly 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:

Distribution of LIHTC's



Potential Areas of Discriminatory Business Practices and Identification of Impediments:

- A 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.

Fair Housing Complaint Profile

Fair Housing Complaints: There have been few fair housing complaints in the City of Bryan. For the 2020-2024 reporting period eleven (11) discrimination cases were provided to the City by HUD FHEO or the Texas Workforce Commission Civil Rights Division. 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 (63%), followed by family status and race (27% each), and National Origin (one; .9%). All cases were found to be without cause, withdrawn, settled, or dismissed.

- **Documentation of Fair Housing Complaints:** The following table illustrates the fair housing complaints within the jurisdictional boundaries of the City of Bryan.

Case Number - HUD	Closure Reason	Filing Date - FHAP	HUD Closure Date	Bases	Issues
06-24-6762-8	Complainant failed to cooperate	9/29/2023	03/07/24	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
06-23-6254-8	No cause determination	5/1/2023	09/14/23	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
06-21-1475-8	No cause determination	6/23/2021	09/07/21	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
06-23-5869-8	Complaint withdrawn by complainant without resolution	12/30/2022	04/21/23	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
06-20-8442-8	Conciliation/settlement successful	5/8/2020	12/08/20	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
06-23-5943-8	No cause determination	1/30/2023	07/12/23	Disability	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)
06-23-5976-8	Conciliation/settlement successful	2/1/2023	11/07/23	Race, Sex, Religion, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
06-22-4463-8	Conciliation/settlement successful	7/6/2022	10/27/22	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental; Other discriminatory acts
06-23-5614-8	Complaint withdrawn by complainant without resolution	11/3/2022	04/27/23	Race, Color	Discrimination in terms/conditions/privileges relating to rental
06-22-4676-8	No cause determination	7/20/2022	01/18/23	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
06-23-6032-8	No cause determination	2/23/2023	01/26/24	National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 901 (criminal)

- **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 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
- **Protected groups reporting complaints:** Of the 11 complaints reported in the prior period, the primary basis for discrimination complaints was disability, followed by race and national origin. All cases were found to be without cause, withdrawn, conciliated, or administratively closed. The number of discrimination complaints decreased from the 2015-2019 period, when there were 15 complaints in Bryan.
- **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 complaints during the 2020-2024 period have been found to have no cause, or were dismissed, conciliated, settled, 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 landlord orientation sponsored by the Brazos Valley Council of Governments
- **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 monitor's policies and procedures of Texas Insurers.
- **Austin Tenant's Council:** This agency has been active in the area assisting with discrimination complaints in the past.

Evaluation of Fair Housing Enforcement and Monitoring Provisions: For the 2020-2024 period, there have been no fair housing complaints made to the City, and 11 complaints made to HUD or TWC regarding discrimination in the City of Bryan. All complaints have been successfully resolved.

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 through 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 leasing, subleasing, 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)

LOAN DISPOSITIONS

Page | 1

LIST OF FINANCIAL INSTITUTIONS WHOS DATA MAKE UP THE 2023 MSA/MD AGGREGATE REPORT
MSA/MD: 17780 – COLLEGE STATION-BRYAN, TX

21ST MORTGAGE CORPORATION	ANGEL OAK MORTGAGE SOLUTIONS LLC
A&D MORTGAGE LLC	ARBOR REALTY TRUST, INC.
A+ FEDERAL CREDIT UNION	ARC HOME LLC
AAFMAA MORTGAGE SERVICES LLC	ARK-LA-TEX FINANCIAL SERVICES, LLC.
AAXY L.L.C.	ARMED FORCES BANK, NATIONAL ASSOCIATION
ABILENE TEACHERS FEDERAL CREDIT UNION	ASPIRE FINANCIAL, INC.
ACADEMY MORTGAGE CORPORATION	ASSURANCE FINANCIAL GROUP, L.L.C.
ACCESS COMMUNITY CREDIT UNION	ATLANTIC BAY MORTGAGE GROUP, L.L.C.
ACHIEVE HOME LOANS	AUSTIN BANK, TEXAS NATIONAL ASSOCIATION
ADVANCIAL	AUSTIN COUNTY STATE BANK
ADVISORS MORTGAGE GROUP, L.L.C.	AXIA FINANCIAL, LLC
AGFIRST FARM CREDIT BANK	B1BANK
AIR ACADEMY	BANK OF AMERICA, NATIONAL ASSOCIATION
ALL CREDIT CONSIDERED MORTGAGE, INC.	BANK OF BRENHAM N.A.
ALLIANT CREDIT UNION	BANK OF ENGLAND
ALLY BANK	BARRINGTON BANK & TRUST COMPANY, N.A.
ALTRA	BAXTER CREDIT UNION
AMARILLO NATIONAL BANK	BAY EQUITY LLC
AMCAP MORTGAGE, LTD.	BELINE LOANS, INC.
AMERANT MORTGAGE LLC	BELLCO
AMERICAN AIRLINES FEDERAL CREDIT UNION	BERKADIA COMMERCIAL MORTGAGE LLC
AMERICAN BANK, N.A.	BETTER MORTGAGE CORPORATION
AMERICAN BANK, NATIONAL ASSOCIATION	BMO HARRIS BANK NATIONAL ASSOCIATION
AMERICAN FEDERAL MORTGAGE CORPORATION	BNC NATIONAL BANK
AMERICAN FINANCIAL NETWORK, INC.	BOKF, NATIONAL ASSOCIATION
AMERICAN FINANCIAL RESOURCES, INC.	BPL MORTGAGE TRUST LLC
AMERICAN FINANCING CORPORATION	BRADESCO BANK
AMERICAN FIRST NATIONAL BANK	BRAZOS VALLEY SCHOOLS
AMERICAN HERITAGE LENDING, INC.	BRENNHAM NATIONAL BANK, THE
AMERICAN HOMESTAR MORTGAGE, L.L.C.	BRIGHTLAND MORTGAGE SERVICES, LTD.
AMERICAN LIBERTY MORTGAGE	BROADWAY NATIONAL BANK
AMERICAN MOMENTUM BANK	BROKER SOLUTIONS, INC.
AMERICAN NATIONAL BANK & TRUST	CADENCE BANK
AMERICAN NEIGHBORHOOD MORTGAGE ACCEPTANCE COMPANY LLC	CALCON MUTUAL MORTGAGE LLC
AMERIHOM MORTGAGE COMPANY, LLC	CALIBER HOME LOANS, INC.
AMERIS BANK	CANOPY MORTGAGE, LLC
AMERISAVE MORTGAGE CORPORATION	CAPITOL CREDIT UNION
AMERITRUST MORTGAGE CORPORATION	CARDINAL FINANCIAL COMPANY, LIMITED PARTNERSHIP
AMOCO	CARRINGTON MORTGAGE SERVICES, LLC
AMPLIFY	CASTLE & COOKE MORTGAGE, LLC
AMWEST FUNDING CORP.	CASTLE MORTGAGE CORPORATION

Page | 2

CENTENNIAL BANK	DHI MORTGAGE COMPANY, LTD.
CENTIER BANK	DISCOVER BANK
CENTRAL BANK	DOMINION FINANCIAL SERVICES, LLC
CENTRAL NATIONAL BANK	DRAPER AND KRAMER MORTGAGE CORP.
CERTIFIED FUNDING, L.P.	DUGOOD FEDERAL CREDIT UNION
CF BANK, NATIONAL ASSOCIATION	EASTMAN
CHANGE LENDING LLC	EDUCATION FIRST
CHARLES SCHWAB BANK, SSB	EFCU
CHARITWAY FEDERAL CREDIT UNION	EL PASO AREA TEACHERS
CHERRY CREEK MORTGAGE, LLC	EMPEOPLE CREDIT UNION
CHEVRON	ENCOMPASS LENDING GROUP, LP
CHICAGO MORTGAGE SOLUTIONS LLC	ENCORE BANK
CHICKASAW COMMUNITY BANK	ENDEAVOR CAPITAL, LLC.
CHURCHILL MORTGAGE CORPORATION	ENNKAR INC.
CITADEL SERVICING CORPORATION	ENVY MORTGAGE, LTD
CITIBANK, NATIONAL ASSOCIATION	EQUITY PRIME MORTGAGE LLC
CITIZENS BANK, NATIONAL ASSOCIATION	EUSTIS AND AMERICAN MORTGAGE COMPANY
CITIZENS NATIONAL BANK, N.A.	EVANSVILLE TEACHERS
CITIZENS STATE BANK	EVERETT FINANCIAL, INC.
CITY BANK	EVOLVE BANK & TRUST
CIVIC FINANCIAL SERVICES, LLC	EXTRACO BANKS, NATIONAL ASSOCIATION
CLASSIC BANK, NATIONAL ASSOCIATION	FAIRWAY INDEPENDENT MORTGAGE CORPORATION
CLM MORTGAGE, INC.	FALCON INTERNATIONAL BANK
CMG MORTGAGE, INC.	FARM CREDIT MID-AMERICA, ACA
CNB COMMUNITY DEVELOPMENT CORPORATION	FARMERS BANK & TRUST
COLONIAL SAVINGS, F.A.	FBC MORTGAGE, LLC
COMERICA BANK	FEDERATED MORTGAGE CORP.
COMMUNITY NATIONAL BANK & TRUST OF TEXAS	FIFTH THIRD BANK, NATIONAL ASSOCIATION
CONSUMER REAL ESTATE FINANCE CO.	FLO MORTGAGE, LLC
CORNERSTONE FIRST MORTGAGE, INC.	FINANCE OF AMERICA REVERSE LLC
CORNERSTONE HOME LENDING, INC.	FIRST BANK
COUNTRYPLACE MORTGAGE, LTD.	FIRST CENTENNIAL MORTGAGE CORPORATION
CREDIT HUMAN FEDERAL CREDIT UNION	FIRST CENTRAL CREDIT UNION
CREDIT UNION OF TEXAS	FIRST COMMERCIAL BANK, NATIONAL ASSOCIATION
CROSSCOUNTRY MORTGAGE, INC.	FIRST COMMUNITY CREDIT UNION
CROSSROADS BANK	FIRST COMMUNITY MORTGAGE, INC.
CSL FINANCIAL, LLC	FIRST CONTINENTAL MORTGAGE, LTD.
CUSTOMER SERVICE MORTGAGE CORPORATION	FIRST CREDIT CORPORATION OF NEW YORK, INC.
DAS ACQUISITION COMPANY, LLC	FIRST FEDERAL BANK
DATA MORTGAGE, INC.	FIRST FINANCIAL BANK, NATIONAL ASSOCIATION
DEERHAVEN MORTGAGE LLC	FIRST HORIZON BANK
DELMAR FINANCIAL COMPANY	FIRST INTERNET BANK OF INDIANA
DEVON BANK	FIRST LIBERTY BANK

FIRST NATIONAL BANK
 FIRST NATIONAL BANK OF AMERICA
 FIRST NATIONAL BANK OF BOSQUE COUNTY
 FIRST NATIONAL BANK OF CENTRAL TEXAS
 FIRST NATIONAL BANK OF HUNTSVILLE
 FIRST NATIONAL BANK TEXAS
 FIRST SAVINGS BANK
 FIRST SERVICE CREDIT UNION
 FIRST STATE BANK OF ST. CHARLES, MISSOURI
 FIRST TECHNOLOGY
 FIRST UNITED BANK AND TRUST COMPANY
 FIRSTBANK
 FIRST-CITIZENS BANK & TRUST COMPANY
 FIRST-LOCKHART NATIONAL BANK
 FLAGSTAR BANK, FSB
 FLORIDA CAPITAL BANK, NATIONAL ASSOCIATION
 FREEDOM MORTGAGE CORPORATION
 FRONTIER BANK OF TEXAS
 FROST BANK
 FUNDLOANS CAPITAL
 GARDNER FINANCIAL SERVICES, LTD.
 GATEWAY FIRST BANK
 GENEVA FINANCIAL, LLC
 GENHOME MORTGAGE CORPORATION
 GMFS LLC
 GOLD STAR MORTGAGE FINANCIAL GROUP, CORPORATION
 GOODLEAP, LLC
 GREATER TEXAS FEDERAL CREDIT UNION
 GREENBOX LOANS, INC.
 GUARANTEED RATE AFFINITY, LLC
 GUARANTEED RATE, INC.
 GUARANTY BANK & TRUST, N.A.
 GUIDANCE RESIDENTIAL, LLC
 GUILD MORTGAGE COMPANY
 GULF COAST BANK AND TRUST COMPANY
 GULF COAST EDUCATORS FEDERAL CREDIT UNION
 H E B
 HAMILTON MORTGAGE CORPORATION
 HANCOCK WHITNEY BANK
 HARMONY HOME LENDING, LLC
 HERRING BANK
 HIGHLANDS RESIDENTIAL MORTGAGE, LTD.
 HOME FINANCING UNLIMITED, INC.

HOME TOWN FUNDING, INC.
 HOMEBRIDGE FINANCIAL SERVICES, INC.
 HOMEOWNERS FINANCIAL GROUP USA, LLC
 HOMEPROMISE CORPORATION
 HOMETOWN EQUITY MORTGAGE, LLC
 HOMETRUST MORTGAGE COMPANY
 HOMEXPRESS MORTGAGE CORP.
 HOUSTON FEDERAL CREDIT UNION
 HOUSTON TEXAS FIRE FIGHTERS
 HSBC BANK USA, NATIONAL ASSOCIATION
 HTLF BANK
 ICECAP GROUP
 INDEPENDENT BANK
 INSPIRE HOME LOANS INC.
 INTEGRITY HOME MORTGAGE CORPORATION
 INTEGRITY MORTGAGE CORPORATION OF TEXAS
 INTERBANK
 INTERCAP LENDING INC.
 INTERLINC MORTGAGE SERVICES, LLC
 INTERNATIONAL BANK OF COMMERCE
 INWOOD NATIONAL BANK
 IVY MORTGAGE, INC.
 JEFFERSON FINANCIAL
 JONES LANG LASALLE MULTIFAMILY, LLC
 JPMORGAN CHASE BANK, NATIONAL ASSOCIATION
 JSC
 JUSTICE FEDERAL CREDIT UNION
 KIAVI FUNDING, INC
 KIND LENDING, LLC
 KWIK MORTGAGE CORPORATION
 LAKEVIEW COMMUNITY CAPITAL, LLC
 LAKEVIEW LOAN SERVICING, LLC
 LEADERONE FINANCIAL CORPORATION
 LEGEND LENDING CORPORATION
 LENDINGONE, LLC
 LENDSURE MORTGAGE CORP.
 LENOX FINANCIAL MORTGAGE CORPORATION
 LIBERTY HOME MORTGAGE CORPORATION
 LOAN SIMPLE, INC.
 LOANDEPOT.COM, LLC
 LOANPEOPLE, LLC
 LOWER, LLC
 M SQUARED FINANCIAL

MANN FINANCIAL INC.
 MEMBER HOME LOAN, L.L.C.
 MEMBERS CHOICE CREDIT UNION
 METRO CITY BANK
 MICHIGAN MUTUAL, INC.
 MID AMERICA MORTGAGE, INC.
 MIDFIRST BANK
 MISSION LOANS, LLC
 MLB RESIDENTIAL LENDING, LLC
 MORGAN STANLEY PRIVATE BANK, NATIONAL ASSOCIATION
 MORTGAGE FINANCIAL SERVICES, LLC
 MORTGAGE RESEARCH CENTER, LLC
 MORTGAGE SOLUTIONS OF COLORADO, LLC
 MOVEMENT MORTGAGE, LLC
 MUTUAL OF OMAHA MORTGAGE, INC
 NATIONS DIRECT MORTGAGE, LLC
 NATIONS LENDING CORPORATION
 NATIONS RELIABLE LENDING, LLC
 NATIONSTAR MORTGAGE LLC
 NAVY ARMY COMMUNITY CREDIT UNION
 NAVY FEDERAL CREDIT UNION
 NBKC BANK
 NECHES
 NETWORK CAPITAL FUNDING CORPORATION
 NETWORK FUNDING, L.P.
 NEW DAY FINANCIAL, LLC
 NEW FED MORTGAGE, CORP.
 NEWREZ LLC
 NEXBANK
 NEXERA HOLDING LLC
 NJ LENDERS CORP.
 NORTH AMERICAN SAVINGS BANK, F.S.B.
 NORTHPOINTE BANK
 NOVA FINANCIAL & INVESTMENT CORPORATION
 NP, INC.
 NTFN, INC.
 NUMARK CREDIT UNION
 NUWAVE LENDING LLC
 OAKTREE FUNDING CORP.
 OCMB, INC.
 OLD NATIONAL BANK
 OPEN MORTGAGE, LLC
 ORIGIN BANK

ORIGINPOINT, LLC
 ORIX REAL ESTATE CAPITAL, LLC
 PACIFIC RESIDENTIAL MORTGAGE, LLC
 PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC.
 PENNYMAC LOAN SERVICES, LLC
 PENTAGON FEDERAL CREDIT UNION
 PHH MORTGAGE CORPORATION
 PILGRIM MORTGAGE LLC
 PINNACLE BANK
 PLAINS COMMERCE BANK
 PLANET HOME LENDING, LLC
 PLAZA HOME MORTGAGE, INC.
 PNC BANK, NATIONAL ASSOCIATION
 PREMIA MORTGAGE, LLC
 PRIMARY RESIDENTIAL MORTGAGE, INC.
 PRIMELENDING, A PLAINSCAPITAL COMPANY
 PRIMIS MORTGAGE COMPANY
 PRINCETON MORTGAGE CORPORATION
 PROSPERITY BANK
 PROSPERITY HOME MORTGAGE, LLC
 PROVIDENT FUNDING ASSOCIATES, L.P.
 PURDUE FEDERAL CREDIT UNION
 QUONTIC BANK
 R BANK
 RANDOLPH-BROOKS
 RAYMOND JAMES BANK
 RBC BANK, (GEORGIA) NATIONAL ASSOCIATION
 READYCAP COMMERCIAL, LLC
 RED RIVER EMPLOYEES
 REDWOOD RESIDENTIAL ACQUISITION CORPORATION
 REGIONS BANK
 REPUBLIC STATE MORTGAGE CO.
 RESICENTRAL, LLC
 RF RENOVO MANAGEMENT COMPANY, LLC
 ROCKET MORTGAGE, LLC
 ROUND TOP STATE BANK
 ROYAL PACIFIC FUNDING CORPORATION
 ROYAL UNITED MORTGAGE LLC
 S&S FINANCIAL
 SCE FEDERAL CREDIT UNION
 SECURITY SERVICE
 SECURITYNATIONAL MORTGAGE COMPANY
 SENTE MORTGAGE, INC.

SFMC, LP
SHELBY SAVINGS BANK, SSB
SIMMONS BANK
SOFI BANK, NATIONAL ASSOCIATION
SOUTHSIDE BANK
SOUTHSTAR BANK, S.S.B.
SOUTHTRUST BANK, N.A.
SOUTHWEST FUNDING, LP
SOUTHWEST STAGE FUNDING, LLC
SPECIALIZED LOAN SERVICING LLC
SPRING EQ, LLC
STARION BANK
STELLAR BANK
STG MORTGAGE INC
STIFEL BANK AND TRUST
STRONG HOME MORTGAGE, LLC
SUCCESS LENDING, LLC
SUCCESS MORTGAGE PARTNERS, INC.
SUMMIT FUNDING, INC.
SUN WEST MORTGAGE COMPANY, INC.
SUNFLOWER BANK, NATIONAL ASSOCIATION
SUNSTATE FEDERAL CREDIT UNION
SUSSEY BANK
SWBC MORTGAGE CORPORATION
T2 FINANCIAL LLC
TAMMAC HOLDINGS CORPORATION
TEACHERS
TEMPLE VIEW CAPITAL FUNDING, LP
TEXAS BANK AND TRUST COMPANY
TEXAS BAY
TEXAS COMMUNITY BANK
TEXAS DOW EMPLOYEES CREDIT UNION
TEXAS HEALTH CREDIT UNION
TEXAS MORTGAGE LENDING, LLC
TEXAS NATIONAL BANK
TEXAS NATIONAL BANK OF JACKSONVILLE
TEXAS REGIONAL BANK
TEXAS STATE BANK
TEXAS TECH
TEXAS TRUST
TEXELL CREDIT UNION
THE AMERICAN NATIONAL BANK OF TEXAS
THE BANK OF SAN ANTONIO

THE CANANDAIGUA NATIONAL BANK AND TRUST COMPANY
THE CENTRAL TRUST BANK
THE FEDERAL SAVINGS BANK
THE FIRST LIBERTY NATIONAL BANK
THE FIRST NATIONAL BANK OF BASTROP
THE FIRST NATIONAL BANK OF BELLVILLE
THE FIRST STATE BANK
THE HUNTINGTON NATIONAL BANK
THE LOAN STORE, INC.
THE MONEY SOURCE INC.
THIRD COAST BANK SSB
THRIVE MORTGAGE, LLC
THRIVENT FEDERAL CREDIT UNION
TIB, NATIONAL ASSOCIATION
TOWN SQUARE MORTGAGE & INVESTMENTS, INC.
TOWNE MORTGAGE COMPANY
TRIAD FINANCIAL SERVICES, INC.
TRUHOME SOLUTIONS, LLC
TRUIST BANK
U.S. BANK NATIONAL ASSOCIATION
UBS BANK USA
UIF CORPORATION
UNION HOME MORTGAGE CORP.
UNITED BUILT HOMES, L.L.C.
UNITED COMMUNITY BANK
UNITED HERITAGE CREDIT UNION
UNITED SHORE FINANCIAL SERVICES, LLC
UNIVERSITY FEDERAL CREDIT UNION
USAA FEDERAL SAVINGS BANK
V.I.P. MORTGAGE, INC.
VANDERBILT MORTGAGE AND FINANCE, INC.
VANTAGE BANK TEXAS
VERABANK, NATIONAL ASSOCIATION
VERITEX COMMUNITY BANK
VILLAGE CAPITAL & INVESTMENT LLC
WALLICK & VOLK, INC.
WATERMARK CAPITAL, INC.
WELLS FARGO BANK, NATIONAL ASSOCIATION
WEST TEXAS NATIONAL BANK
WESTSTAR MORTGAGE CORPORATION
WILMINGTON SAVINGS FUND SOCIETY, FSB
YOAKUM NATIONAL BANK
ZILLOW HOME LOANS, LLC

ZIONS BANCORPORATION, N.A.

CENSUS TRACT OR COUNTY NAME (COUNTY/STATE/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings													
	Home Purchase Loans													
	A		B		C		D		E		F		G	
	FHA, FSA/RHS & VA		Conventional		Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C, and D		Loans On Manufactured Home Dwellings From Columns A, B, C, & D	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
BRAZOS COUNTY/TEXAS/000401	4	940000	2	450000	1	195000	0	0	0	0	1	195000	0	0
BRAZOS COUNTY/TEXAS/000402	2	430000	2	370000	0	0	0	0	0	0	1	165000	0	0
BRAZOS COUNTY/TEXAS/000501	15	3485000	9	1265000	0	0	0	0	0	0	1	215000	0	0
BRAZOS COUNTY/TEXAS/000502	1	185000	0	0	0	0	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/000603	2	380000	4	520000	0	0	0	0	0	0	1	135000	1	15000
BRAZOS COUNTY/TEXAS/000605	16	4320000	7	1055000	0	0	0	0	0	0	0	0	1	65000
BRAZOS COUNTY/TEXAS/000606	1	275000	2	170000	0	0	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/000700	1	205000	4	690000	0	0	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/000800	5	935000	10	1990000	1	305000	0	0	0	0	2	390000	0	0
BRAZOS COUNTY/TEXAS/000900	0	0	0	0	0	0	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/001001	1	415000	0	0	0	0	0	0	0	0	4	1030000	0	0
BRAZOS COUNTY/TEXAS/001002	0	0	7	1765000	1	75000	0	0	0	0	3	465000	0	0
BRAZOS COUNTY/TEXAS/001101	2	470000	7	1805000	0	0	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/001102	2	610000	2	290000	0	0	0	0	0	0	2	410000	0	0
BRAZOS COUNTY/TEXAS/001301	1	405000	5	975000	0	0	0	0	0	0	1	345000	0	0
BRAZOS COUNTY/TEXAS/001302	1	445000	3	1035000	0	0	1	345000	0	0	3	985000	0	0

CENSUS TRACT OR COUNTY NAME (COUNTY/STATE/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings													
	Home Purchase Loans													
	A		B		C		D		E		F		G	
	FHA, FSA/RHS & VA		Conventional		Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C, and D		Loans On Manufactured Home Dwellings From Columns A, B, C, & D	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
BRAZOS COUNTY/TEXAS/001303	0	0	3	985000	0	0	0	0	0	0	2	310000	0	0
BRAZOS COUNTY/TEXAS/001604	0	0	3	645000	0	0	0	0	0	0	1	135000	0	0
BRAZOS COUNTY/TEXAS/001605	1	165000	3	505000	2	290000	0	0	0	0	1	415000	0	0
BRAZOS COUNTY/TEXAS/001606	0	0	1	415000	0	0	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/001607	0	0	0	0	0	0	0	0	0	0	3	995000	0	0
BRAZOS COUNTY/TEXAS/001608	0	0	4	1270000	0	0	0	0	0	0	3	505000	0	0
BRAZOS COUNTY/TEXAS/001702	0	0	6	1020000	0	0	0	0	0	0	2	630000	0	0
BRAZOS COUNTY/TEXAS/001703	0	0	3	885000	1	235000	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/001704	0	0	0	0	0	0	0	0	0	0	6	890000	0	0
BRAZOS COUNTY/TEXAS/001801	4	1070000	8	1280000	2	320000	0	0	0	0	4	960000	0	0
BRAZOS COUNTY/TEXAS/001803	2	820000	9	2405000	0	0	0	0	0	0	2	350000	0	0
BRAZOS COUNTY/TEXAS/001804	3	825000	1	155000	1	195000	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/001901	2	580000	6	1630000	0	0	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/001902	4	950000	5	685000	0	0	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/002001	4	1780000	9	3145000	1	365000	0	0	0	0	1	225000	0	0
BRAZOS COUNTY/TEXAS/002006	2	500000	3	805000	1	215000	0	0	0	0	6	1430000	0	0
BRAZOS COUNTY/TEXAS/002009	14	4040000	29	8985000	4	1470000	0	0	0	0	2	500000	0	0

CENSUS TRACT OR COUNTY NAME (COUNTY/STATE/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings													
	Home Purchase Loans													
	A		B		C		D		E		F		G	
	FHA, FSA/RHS & VA		Conventional		Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C, and D		Loans On Manufactured Home Dwellings From Columns A, B, C, & D	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
BRAZOS COUNTY/TEXAS/002010	23	8455000	39	12295000	2	950000	0	0	0	0	1	335000	1	85000
BRAZOS COUNTY/TEXAS/002011	9	3235000	10	3310000	0	0	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/002014	0	0	1	725000	0	0	0	0	0	0	1	265000	0	0
BRAZOS COUNTY/TEXAS/002016	1	605000	11	3745000	1	225000	0	0	0	0	1	165000	0	0
BRAZOS COUNTY/TEXAS/002018	3	785000	4	1050000	0	0	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/002019	8	2680000	6	1940000	1	175000	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/002020	4	1020000	5	2435000	2	770000	0	0	0	0	3	785000	2	250000
BRAZOS COUNTY/TEXAS/002021	4	1640000	22	7900000	0	0	0	0	0	0	2	320000	0	0
BRAZOS COUNTY/TEXAS/002022	5	1195000	8	2030000	1	215000	0	0	0	0	1	185000	0	0
BRAZOS COUNTY/TEXAS/002023	0	0	1	185000	0	0	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/002024	0	0	1	195000	0	0	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/002025	2	530000	9	2525000	0	0	0	0	0	0	1	185000	0	0
BRAZOS COUNTY/TEXAS/002026	6	2630000	32	12590000	2	670000	0	0	0	0	0	0	0	0
BRAZOS COUNTY/TEXAS/002100	0	0	0	0	0	0	0	0	0	0	0	0	1	85000
BURLESON COUNTY/TEXAS/970100	2	890000	1	85000	1	365000	0	0	0	0	0	0	1	205000
BURLESON COUNTY/TEXAS/970201	0	0	2	800000	0	0	0	0	0	0	0	0	3	355000
BURLESON COUNTY/TEXAS/970202	2	350000	3	495000	1	725000	0	0	0	0	2	370000	1	95000

CENSUS TRACT OR COUNTY NAME (COUNTY/STATE/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings													
	Home Purchase Loans													
	A		B		C		D		E		F		G	
	FHA, FSA/RHS & VA		Conventional		Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C, and D		Loans On Manufactured Home Dwellings From Columns A, B, C, & D	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
BURLESON COUNTY/TEXAS/970300	7	2045000	13	2385000	2	670000	0	0	0	0	0	0	6	1220000
BURLESON COUNTY/TEXAS/970400	14	4040000	11	2515000	1	425000	0	0	0	0	1	135000	4	780000
BURLESON COUNTY/TEXAS/970501	7	1355000	3	465000	1	255000	0	0	0	0	0	0	1	155000
BURLESON COUNTY/TEXAS/970502	3	645000	5	465000	0	0	0	0	0	0	0	0	1	185000
ROBERTSON COUNTY/TEXAS/960100	4	710000	1	185000	0	0	0	0	0	0	1	85000	1	85000
ROBERTSON COUNTY/TEXAS/960200	1	255000	1	85000	0	0	0	0	0	0	2	460000	9	1695000
ROBERTSON COUNTY/TEXAS/960300	8	1800000	12	3010000	2	810000	0	0	0	0	0	0	5	935000
ROBERTSON COUNTY/TEXAS/960400	2	450000	3	485000	0	0	0	0	0	0	0	0	2	210000
ROBERTSON COUNTY/TEXAS/960501	11	1785000	4	80000	0	0	0	0	0	0	1	275000	1	145000
ROBERTSON COUNTY/TEXAS/960502	4	1440000	1	275000	1	145000	0	0	0	0				

Aggregate report: Disposition of applications by income, race, and ethnicity of applicant, 2023

INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
LESS THAN 50% OF MSA/MD MEDIAN														
RACE														
American Indian or Alaska Native	9	685000	1	45000	0	0	7	565000	0	0	1	75000	0	0
Asian	14	2160000	1	159000	0	0	9	1345000	1	109000	3	555000	0	0
Black or African American	111	10325000	5	475000	2	120000	78	8050000	11	635000	15	1045000	0	0
Native Hawaiian or Other Pacific Islander	1	265000	0	0	0	0	1	265000	0	0	0	0	0	0
White	266	27010000	58	6330000	7	615000	137	14425000	31	3415000	33	2225000	1	165000
2 or more minority races	2	440000	2	440000	0	0	0	0	0	0	0	0	0	0
Joint	3	175000	0	0	0	0	0	0	0	0	3	175000	0	0
Free Form Text Only	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Race Not Available	73	8025000	15	1785000	1	205000	38	3950000	9	1195000	10	890000	1	155000
ETHNICITY														
Hispanic or Latino	123	11105000	23	2485000	2	90000	62	6040000	11	915000	25	1575000	0	0
Not Hispanic or Latino	273	28985000	43	4965000	6	580000	160	17360000	30	3260000	34	2820000	0	0
Joint	8	870000	2	430000	1	65000	4	330000	1	45000	0	0	0	0

INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
Free Form Text Only	1	25000	0	0	0	0	0	0	1	25000	0	0	0	0
Ethnicity Not Available	74	8100000	14	1350000	1	205000	44	4870000	9	1105000	6	570000	2	320000
50-79% OF MSA/MD MEDIAN														
RACE														
American Indian or Alaska Native	15	1855000	6	730000	1	85000	6	750000	0	0	2	290000	0	0
Asian	30	4840000	11	2395000	5	385000	4	450000	5	1235000	5	375000	0	0
Black or African American	101	13585000	27	3795000	5	695000	54	7100000	6	1080000	9	915000	0	0
Native Hawaiian or Other Pacific Islander	2	190000	1	115000	0	0	1	75000	0	0	0	0	0	0
White	637	90145000	273	45545000	27	2765000	193	22185000	65	9915000	79	9735000	6	1120000
2 or more minority races	4	590000	0	0	0	0	2	220000	1	265000	1	105000	0	0
Joint	13	2175000	10	1660000	0	0	2	280000	1	235000	0	0	0	0
Free Form Text Only	1	155000	1	155000	0	0	0	0	0	0	0	0	0	0
Race Not Available	168	22660000	46	7810000	7	665000	71	8505000	24	4010000	20	1670000	6	1250000
ETHNICITY														
Hispanic or Latino	295	39025000	104	17130000	13	1045000	114	13100000	24	3910000	40	3840000	2	290000
Not Hispanic or Latino	527	75875000	227	37815000	24	2780000	168	20010000	53	8025000	55	7245000	4	830000
Joint	29	3915000	10	1520000	1	55000	11	1475000	4	590000	3	275000	0	0

INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
Free Form Text Only	1	25000	0	0	0	0	1	25000	0	0	0	0	0	0
Ethnicity Not Available	119	17355000	34	5740000	7	715000	39	4955000	21	4215000	18	1730000	6	1250000
80-99% OF MSA/MD MEDIAN														
RACE														
American Indian or Alaska Native	11	1955000	2	370000	0	0	6	1050000	2	290000	1	245000	0	0
Asian	26	5680000	14	3590000	2	150000	6	1060000	3	755000	1	125000	0	0
Black or African American	76	14230000	29	6325000	4	700000	25	4315000	11	1965000	7	925000	0	0
Native Hawaiian or Other Pacific Islander	0	0	0	0	0	0	0	0	0	0	0	0	0	0
White	527	95615000	290	59470000	26	3260000	116	16710000	59	12315000	36	3860000	6	1080000
2 or more minority races	1	195000	0	0	0	0	1	195000	0	0	0	0	0	0
Joint	16	3020000	10	2120000	1	105000	3	455000	0	0	2	340000	0	0
Free Form Text Only	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Race Not Available	125	21095000	45	9725000	5	885000	42	5060000	19	4005000	14	1420000	4	960000
ETHNICITY														
Hispanic or Latino	186	30640000	75	13865000	8	950000	58	8810000	26	4960000	19	2055000	2	390000
Not Hispanic or Latino	472	88100000	265	56355000	18	2320000	100	13910000	57	11725000	32	3790000	4	690000
Joint	28	5560000	15	3485000	2	320000	10	1680000	0	0	1	75000	0	0

INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
Free Form Text Only	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ethnicity Not Available	96	17490000	35	7895000	10	1510000	31	4445000	11	2645000	9	995000	4	960000
100-119% OF MSA/MD MEDIAN														
RACE														
American Indian or Alaska Native	5	985000	2	480000	0	0	1	285000	1	155000	1	65000	0	0
Asian	31	8335000	19	5325000	0	0	5	1225000	7	1785000	0	0	0	0
Black or African American	59	10935000	22	4950000	2	240000	16	2340000	8	1680000	11	1725000	0	0
Native Hawaiian or Other Pacific Islander	1	135000	0	0	0	0	0	0	1	135000	0	0	0	0
White	486	97820000	170	58490000	25	5195000	83	12275000	74	16220000	34	5640000	9	2655000
2 or more minority races	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Joint	19	3615000	8	1600000	0	0	6	870000	3	915000	2	230000	0	0
Free Form Text Only	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Race Not Available	109	23005000	67	15595000	3	385000	20	3120000	15	3435000	4	470000	5	1105000
ETHNICITY														
Hispanic or Latino	125	25915000	74	16530000	3	555000	30	4750000	13	3315000	5	765000	0	0
Not Hispanic or Latino	440	90340000	238	52830000	20	3980000	79	12555000	72	15880000	31	5095000	9	2655000
Joint	42	8230000	19	4245000	3	795000	4	260000	8	1790000	8	1140000	0	0

INCOME, RACE AND ETHNICITY	Applications Received		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
Free Form Text Only	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ethnicity Not Available	103	20345000	57	12835000	4	490000	18	2550000	16	3340000	8	1130000	5	1105000
120% OR MORE OF MSA/MD MEDIAN														
RACE														
American Indian or Alaska Native	8	2120000	5	1565000	0	0	2	320000	0	0	1	235000	0	0
Asian	209	63865000	133	42615000	4	850000	19	3975000	43	14165000	10	2260000	0	0
Black or African American	127	33555000	73	21425000	1	735000	31	5115000	15	5025000	7	1255000	0	0
Native Hawaiian or Other Pacific Islander	5	1005000	1	215000	0	0	3	525000	0	0	1	265000	0	0
White	2352	709460000	1538	500180000	79	17895000	261	96605000	346	112330000	108	22450000	38	13030000
2 or more minority races	2	540000	1	335000	0	0	1	205000	0	0	0	0	0	0
Joint	103	33875000	66	22760000	4	1010000	18	5930000	13	3725000	2	450000	0	0
Free Form Text Only	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Race Not Available	746	379470000	493	266335000	24	6510000	112	60530000	92	40390000	25	5705000	899	245025000
ETHNICITY														
Hispanic or Latino	416	102540000	241	67445000	13	2195000	79	13985000	53	13605000	30	5310000	5	1335000
Not Hispanic or Latino	2253	698655000	1482	493850000	71	17215000	277	57685000	334	110910000	89	18975000	32	11480000
Joint	197	59405000	130	41120000	6	1280000	18	3520000	35	11705000	8	1780000	2	490000
Free Form Text Only	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ethnicity Not Available	686	363290000	457	253015000	22	6310000	93	58015000	87	39395000	27	6555000	898	244750000

Aggregate table: Disposition of loan applications, by race and sex of applicant, 2023

RACE AND SEX	Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
RACE												
AMERICAN INDIAN OR ALASKA NATIVE												
Male	6	1270000	0	0	9	1475000	2	340000	3	535000	0	0
Female	6	940000	1	85000	5	395000	1	105000	1	75000	0	0
Joint	4	980000	0	0	7	965000	0	0	1	235000	0	0
Sex Not Available	0	0	0	0	1	135000	0	0	1	65000	0	0
Total	16	3190000	1	85000	22	2970000	3	445000	6	910000	0	0
ASIAN												
Male	81	23035000	5	755000	22	4950000	26	7210000	5	935000	0	0
Female	40	9910000	3	405000	8	1080000	19	4955000	9	1575000	0	0
Joint	56	20950000	3	225000	12	1830000	13	5695000	5	805000	0	0
Sex Not Available	1	185000	0	0	1	195000	1	185000	0	0	0	0
Total	178	54080000	11	1385000	43	8055000	59	18045000	19	3315000	0	0
BLACK OR AFRICAN AMERICAN												
Male	56	12640000	5	745000	58	7310000	14	3580000	8	910000	0	0
Female	42	9570000	5	575000	99	12355000	19	2765000	23	2305000	0	0
Joint	57	14665000	4	1170000	44	6600000	18	4040000	18	2650000	0	0
Sex Not Available	1	95000	0	0	3	655000	0	0	0	0	0	0
Total	156	36970000	14	2490000	204	26920000	51	10385000	49	5865000	0	0
NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER												
Male	1	215000	0	0	5	865000	1	135000	1	265000	0	0

RACE AND SEX	Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
Female	1	115000	0	0	0	0	0	0	0	0	0	0
Joint	0	0	0	0	0	0	0	0	0	0	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
Total	2	330000	0	0	5	865000	1	135000	1	265000	0	0
WHITE												
Male	721	193195000	55	9125000	257	35645000	197	50875000	103	15655000	24	7070000
Female	437	99165000	33	4285000	218	27220000	118	24740000	81	9555000	8	1670000
Joint	1266	376540000	75	16255000	331	58715000	253	77145000	104	18490000	28	9310000
Sex Not Available	5	1115000	1	65000	4	620000	7	1435000	2	210000	0	0
Total	2429	670015000	164	29730000	810	122200000	575	154195000	290	43910000	60	18050000
2 OR MORE MINORITY RACES												
Male	1	245000	0	0	2	350000	0	0	0	0	0	0
Female	1	335000	0	0	2	270000	0	0	1	105000	0	0
Joint	1	195000	0	0	0	0	1	265000	0	0	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
Total	3	775000	0	0	4	620000	1	265000	1	105000	0	0
JOINT												
Male	2	820000	0	0	1	215000	0	0	0	0	0	0
Female	2	500000	0	0	2	410000	0	0	1	25000	0	0
Joint	90	26820000	5	1115000	26	6910000	17	4875000	8	1170000	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
Total	94	28140000	5	1115000	29	7535000	17	4875000	9	1195000	0	0

RACE AND SEX	Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
FREE FORM TEXT ONLY												
Male	1	155000	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0	0
Joint	0	0	0	0	0	0	0	0	0	0	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
Total	1	155000	0	0	0	0	0	0	0	0	0	0
RACE NOT AVAILABLE												
Male	112	29070000	8	1500000	90	11740000	39	9575000	27	3575000	1	505000
Female	52	11830000	3	395000	48	5780000	12	2820000	9	815000	1	275000
Joint	140	43250000	4	1230000	60	9570000	40	13310000	14	1930000	2	970000
Sex Not Available	362	217100000	25	5525000	85	54075000	68	27330000	23	3835000	911	246745000
Total	666	301250000	40	8650000	283	81165000	159	53035000	73	10155000	915	248495000

Appendix C – TWC FOIA Discrimination Complaints Request Response

R002272-022525 - Public Information Request

Message History (3)

✉ On 2/28/2025 2:36:58 PM, TWC Open Records wrote:

Subject: [Records Center] Public Information Request :: R002272-022525

Body:

RE: PUBLIC RECORDS REQUEST of February 25, 2025, Reference # R002272-022525.

Dear Zyreshia Jackson,

The Texas Workforce Commission received a public information request from you on February 25, 2025. Your request mentioned:

We are requesting information about any housing discrimination complaints filed within the City of Bryan, TX, during the period from 2020 to 2024. Specifically, we are looking for the number of complaints filed, access to investigative files, the findings from those investigations, and any final decisions made. This information will be included in a report submitted to the Department of Housing and Urban Development (HUD) from the city.

The Texas Workforce Commission has reviewed its files and has located responsive records to your request.

Please log in to the Open Records Center at the following link to retrieve the appropriate responsive documents. Please review the information, and if you have any questions, let us know.

[Public Information Request - R002272-022525](#)

Thank you for your interest in the Agency.

Sincerely,

Shauntay Black
Program Specialist I
OGC-Open Records

✉ On 2/25/2025 12:44:35 PM, TWC Open Records wrote:

Appendix D – City of Bryan Legal Request/Response



Interdepartmental Memorandum

To: Thomas Leeper, City Attorney

From: Zyreshia Jackson, Community & Economic Development Specialist

Date: March 7, 2025

Re: Request for Information Regarding Fair Housing Complaints in Bryan

Dear Thomas,

As part of the upcoming City of Bryan's 2025-2029 Five-Year Consolidated Plan submission to the U.S. Department of Housing and Urban Development, the City is required to certify that it is affirmatively furthering fair housing. This means that the City must conduct an update to the Analysis of Impediments to Fair Housing Choice. Toward that end, the Community Development Department would like to please request information from the Legal Department concerning any fair housing complaint cases resulting from the City's Fair Housing Ordinance received by the Legal Department for the period of January 1, 2020 – December 31, 2024. Specifically, we would like to know the case title and date, status, a brief summary, and how the case was resolved.

A reply by interoffice mail or by e-mail stating whether the Legal Department has any information responsive to this request would be greatly appreciated.

Thank you for your assistance.

Regards,

Zyreshia Jackson, Community & Economic Development Specialist
Community Development Department
City of Bryan
1803 Greenfield Plaza
Bryan, TX 77802
zjackson@bryantx.gov

From: [Leeper, Thomas](#)
To: [Jackson, Zyreshia](#)
Cc: [Roach, Arthur](#); [Ridgway, Elizabeth](#)
Subject: RE: Request for Information Regarding Fair Housing Complaints in Bryan
Date: Thursday, March 13, 2025 8:58:54 AM
Attachments: [AL COB Legal Fair Housing Complaint Request.pdf](#)

Hello Zyreshia,

No fair housing complaints have been filed with the Bryan City Attorney's Office pursuant to the City of Bryan's Fair Housing ordinance (Bryan Code of Ordinances, Chapter 58, Article II, Division 2) for the period of 1/01/2020 – 12/31/2024.

Thomas A. Leeper
City Attorney
City of Bryan
(979) 209-5150 [main]
(979) 209-5152 [direct]
