

**Analysis of Impediments to Fair Housing Choice
2010 Update**

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

August, 11 2010



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Introduction

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

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

Fair Housing Complaints:

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

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

Or, contact HUD:

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

Or, contact the Texas Workforce Commission Civil Rights Division:

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

Study Description

The Analysis of Impediments to Fair Housing Choice Update

This Analysis updates that the original analysis to coincide with the City of Bryan's 2010-2014 Consolidated Plan. The study was performed in order to satisfy the requirements of 24 CFR 91.225(a)(1) titled "Certifications", which states:

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

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

This analysis must be updated every three to five years.

Study Observations and Recommendations Summary

Observations

- There have been 19 discrimination complaints made during the 2005-2009 period, all of which related to discrimination in rental. More than half of these were related to discrimination based upon rental terms, conditions, or facilities. The primary basis for discrimination complaints was disability (28%), followed by family status and race (20% each). All cases were found to be without cause, withdrawn, or dismissed.
- Most dilapidated housing is located in low to moderate income areas based upon housing condition survey data collected in April, 2010.
- A review of advertising indicates that local housing providers, lenders, and insurers should be diligent to include fair housing logos and diverse human models, as well as bilingual advertising.
- 100% of all fair housing complaints in the city over the previous five years related to the denial of rental housing.
- The City's zoning and land use policies discourage development of large, high-density multifamily developments, particularly those concentrated in areas the City is interested in improving with retail or other economic development activity, or in maintaining neighborhood integrity.
- In addition, the City promotes scattered site, low-density low-moderate income housing rather than concentrated affordable housing. Such efforts are important to limiting the concentration of poverty in the City.
- Current limits on the numbers of occupants in a single family dwelling likely meet the test of reasonableness under the Fair Housing Act, although some Residential Conservation District zoning by individual neighborhoods (slightly more than 2,000 homes) allows only 2 unrelated adult residents, maximum. This zoning classification could be found not to meet the test of reasonableness under the Fair Housing Act.

- While no local policies were identified as barriers to affordable housing, the federal SAFE Act was identified as a potential barrier. This law was passed by congress in 2008 as a component of the Housing and Economic Recovery Act. As a result, it is likely that lender fees will rise and mortgage products become limited because of SAFE requirements, directly impacting housing affordability in the City of Bryan and throughout the state.
- According to HMDA data, Black applicants' incidence of conventional loan denial is higher than their percentage of their population as a whole and most often due to poor credit history ratings.
- Hispanics and Blacks have higher incidences of government insured loan denials due to excessive debt and inadequate collateral, respectively.
- Both Black and Hispanic applicants experience higher refinance loan denial percentages as compared to their respective percentages of the population as a whole. Poor credit history rating remains the primary reason for loan denials for these minority populations.
- Data indicates that both Black and Hispanic applicants for home improvement loans experience high denial rates due, primarily, to poor credit history ratings.

Recommendations

- Increase fair housing educational and outreach activities to ensure a greater distribution of bilingual materials on the Internet, 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.
- Continue rehabilitation and reconstruction programs and particularly target clusters of dilapidated housing in low-moderate income minority areas as well as work to identify target areas where the City's Capital Improvements Project funding can be effectively leveraged with federal grant funds.
- Provide outreach to work with local lenders, insurers, and housing providers to ensure non-discrimination in advertising and in providing housing and housing services.
- Local multi-family rental property owners should be encouraged to use and display equal housing logos in printed and broadcast advertising materials.
- The City should review Affirmative Marketing Plans for any local, city assisted Housing Tax Credit, HOME, or other federally-assisted developments to ensure and encourage affirmative marketing efforts.
- Consumer credit counseling and homebuyer education should be a priority in the assistance provided by the city and other local housing assistance providers, and should be affirmatively marketed to minority populations.
- Down-payment and closing costs assistance should continue to be a component of homebuyer programs by the City and local housing assistance agencies serving lower-income homebuyers.
- Personal budgeting and homeowner education should be a priority in the assistance provided by the city and other local housing assistance providers, and should be affirmatively marketed to minority populations.

Actions to Affirmatively Further Fair Housing

- City adopted a Fair Housing ordinance adopted to ensure fair housing options are available to its citizens.
- Posters & literature continued to be displayed and made available at city office buildings, utility building, and the public library.
- City staff has monitored all city-sponsored projects for equal access and compliance of the Fair Housing Act.
- City Building Inspection officials have monitored code compliance to Fair Housing and Equal Access Standards.
- Five Public Hearings were held providing information and requesting public comment on fair housing or related issues during the 2010-2014 fiscal years.
- Down-payment and closing cost program assistance made available city-wide to eligible homebuyers by the Community Development Services Department and other local housing services providers.
- Homebuyer and homeowner education including fair housing information is provided by the city and other local housing services providers.
- City sponsored acquisition and new construction program efforts underway to increase affordable housing opportunities locally.
- The City filed comments regarding the federal SAFE Act, identifying possible hindrances to fair housing.
- The Community Development Services Department has made outreach efforts to for-profit and non-profit builders and developers through funding and technical assistance to increase the supply of decent, affordable housing within low to moderate income neighborhoods as well as creation of affordable housing on a city-wide basis.
- The City maintains an Affirmative Marketing Plan to directly market newly-developed City-assisted housing units to minority groups least likely to apply.
- Community Development Services staff have met with local lenders and home builders to encourage the use of non-traditional client loan qualifying and loan products to better serve the needs of homebuyer households with challenges that preclude conventional qualification.
- Community Development Services staff have conducted public outreach regarding availability of housing and housing assistance, including Spanish-language radio broadcasts, translation of housing application materials into Spanish, and maintains bi-lingual staff in order to assist applicants and clients who are not English-proficient.

Results

All City of Bryan-assisted developments are currently in compliance based upon Community Development Services Department monitoring review records. The supply of affordable housing available in low to

moderate income areas and citywide has been increased through the activities of the department. The Building Inspections Division has used the Fair Housing Act of 1968 and the 1994 Americans with Disabilities Act as a standard of compliance for building plans review and code compliance. No complaints have been filed with the City Attorney's office under the City of Bryan Fair Housing Ordinance as of 8/11/2010. For the 2005-2009 period, there have been 19 complaints made to HUD, and no complaints made to the State of Texas regarding discrimination in the City of Bryan. From the 2010-2014 Consolidated Plan Community Needs Assessment, 7% of surveyed respondents expressed a problem with discrimination. A chi-square analysis indicates that significantly more than expected respondents experienced problems in buying or renting property due to inability to afford rent/payments, inability to get a loan, a lack of down-payment resources, and credit difficulties.

Research Objectives

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

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

Sources and Methods

This study utilized data from a variety of sources, to include but not limited to: the U.S. Census Bureau, the Real Estate Center at Texas A&M University, the Bryan/College Station Association of Realtors Multiple Listing Service, the City of Bryan Community Development, Geographic Information Systems, and Planning and Development Services Departments, the Brazos County Appraisal District, FFIEC, the Bryan Economic Development Corporation, and the 2010 Community Needs Assessment Survey.

National, State and Local Fair Housing Laws Summary

National Fair Housing Laws

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

The Federal Fair Housing Act, of 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender/sex, familial status and handicap (disability). The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing units sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons. HUD has the primary authority for enforcing the Federal Fair Housing Act. **Section 504 of the Rehabilitation Act of 1973** prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974 prohibits

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

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

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

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

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

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

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

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

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

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

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

State of Texas Fair Housing Laws

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

Local Fair Housing Laws

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

Activities Utilizing CDBG Funding to Affirmatively Further Fair Housing

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

- Presentation and dissemination of fair housing material at public meetings
- Conducts periodic surveys of the public, local housing industry and agencies to identify issues involving housing discrimination in the community
- Web and print public needs assessment surveys are conducted annually regarding Fair Housing

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

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

- Webpage link to the Department of Housing and Urban Development and fair housing information: http://www.bryantx.gov/departments/?name=fair_housing_and_discrimination
- Participates in the Homebuyer Education Coalition which educates homebuyers about the home buying process, including fair housing
- Display of the Fair Housing Poster prominently throughout the Community Development office, and use of the Fair Housing logo on all promotional materials
- Outreach efforts to for-profit and non-profit builders and developers through funding and technical assistance to increase the supply of decent, affordable housing within low to moderate income neighborhoods as well as creation of affordable housing on a city-wide basis.
- The City maintains and utilizes an Affirmative Marketing Policy process to directly market newly-developed City-assisted housing units to minority groups least likely to apply.
- Community Development Services staff have met with local lenders and home builders to encourage the use of non-traditional client loan qualifying and loan products to better serve the needs of homebuyer households with challenges that preclude conventional qualification.
- Community Development Services staff have conducted public outreach regarding availability of housing and housing assistance, including Spanish-language radio broadcasts, translation of housing application materials into Spanish, and maintains bi-lingual staff in order to assist applicants and clients who are not English-proficient.

Evaluation of activities utilizing CDBG funding. Analysis of public hearing comments and survey data regarding fair housing activities finds continued emphasis on continuing fair housing presentations to the public and building public awareness of fair housing continues to be effective in increasing awareness. For the 2005-2009 period, there have been 19 complaints made to HUD, and no complaints made to the State of Texas regarding discrimination in the City of Bryan. From the 2010-2014 Consolidated Plan Community Needs Assessment, 7% of surveyed respondents expressed a problem with discrimination. A chi-square analysis indicates that significantly more than expected respondents experienced problems in

buying or renting property due to inability to afford rent/payments, inability to get a loan, a lack of down-payment resources, and credit difficulties.

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

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

Affirmative Marketing Policy and Procedures (See Appendix-F)

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

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

The City has identified African American and Hispanic households as two groups in the local housing market who would likely not apply for the units without special outreach. Having identified these two groups, the Community Development Services Department will undertake special outreach methods to enhance minority awareness of the city's affordable housing programs.

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

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

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

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

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

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

- Placing qualified small and minority business enterprises on solicitation lists
- Assuring that small and minority businesses are solicited whenever they are potential sources
- Dividing total requirements, when economically feasible to permit maximum participation by small and minority business and women's business enterprises
- Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business, and women's business enterprises
- Using the services of the Small Business Administration and the Minority Business Development Agency of the Department of Commerce

Analysis of Local Housing Market and Business Practices

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

- The City of Bryan Community Development Staff reviewed six months of real estate sale and rental advertisements published in the local newspaper of record, The Bryan/College Station *Eagle* from January through June, 2010 to ascertain that prohibited terminology was not used, that no preferences concerning protected classes were evident, and that models were of diverse groups.
- The real estate classified section properly contains an equal housing opportunity notice, and no overtly discriminatory advertisements or use of prohibited terms was found.
- Based on this review, there is judged to be no impediments to fair housing with regard to newspaper advertising in Bryan.
- Radio and television advertising were also monitored during this period, though there were comparatively few ads. Cox Cable channel 11 is exclusively devoted to ads for home sales. These were reviewed, and the narratives and photos were found to be non-discriminatory.
- Since 2005, no complaints have been made regarding discriminatory advertising.

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

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

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

- Advertising: A review of the mortgage lenders advertising in the Verizon yellow pages indicates no discriminatory practices. Ads generally have no pictures, other than some with staff photos, and most have equal housing opportunity logos or text indicating they are fair housing lenders. It is recommended that ads using pictures include minority models. It is also recommended that ads include Spanish language. A review of lenders internet webpage advertising indicates that some smaller lenders have not included an equal housing opportunity logo or statement on their websites. It is recommended that these lenders receive fair housing outreach education efforts.
- Affirmative marketing programs: There are no affirmative marketing programs on file from lenders.

- Location of Branches/Offices: There are 77 local branch mortgage lenders reporting that they originate loans in Bryan/College Station, according to FFIEC data. Local lenders are distributed primarily along major thoroughfares, without regard to racial concentrations.
- Evaluation and Analysis of HMDA Data: HMDA data is reported for the combined Bryan/College Station MSA. Separate City of Bryan only data is not available.

**2008 FFIEC HMDA Data Tables
for
Disposition of Applications for Conventional, Government Insured, Refinance and Home
Improvement Loans**

Conventional Loan Denials by Race / Ethnicity - B/CS MSA			
Race / Ethnicity	% Denials	% in MSA	Top 2 Reasons
White	12.6%	75.0%	34% Credit / 17% Collateral
Black / African American	30.5%	11.3%	70% Credit / 13% Debt-to-Income
Hispanic / Latino	21.4%	20.0%	49% Credit / 16% Debt-to-Income

Total Applicants	% Denials	% in MSA
2,891	13.7%	100.0%

Source: 2008 FFIEC HMDA Data

Observation: HMDA data indicates that Black applicants' incidence of conventional loan denial is approximately 19% higher than their percentage of their population as a whole. The large majority (70%) of denials for Black applicants were because of poor credit history ratings. This data suggest that consumer credit counseling and homebuyer education should be a priority in the assistance provided by the city and other local housing assistance providers, and should be affirmatively marketed to minority populations.

FHA / VA / FSA / RSA Loan Denials by Race / Ethnicity - B/CS MSA			
Race / Ethnicity	% Denials	% in MSA	Top 2 Reasons
White	6.3%	75.0%	27% Credit / 22% Debt-to-Income
Black / African American	10.0%	11.3%	33% Debt-to-Income / 22% Credit
Hispanic / Latino	7.0%	20.0%	43% Collateral / 29% Debt-to-Income

Total Applicants	% Denials	% in MSA
895	7.2%	100.0%

Source: 2008 FFIEC HMDA Data

Observation: The higher incidence of government insured loan denials by Black applicants, particularly due to debt-to-income ratios, indicates that consumer credit counseling and personal budgeting education would be warranted, particularly for minority populations. A noted high percentage of loan denials for Hispanic applicants due to inadequate collateral (43%), suggests that down-payment and closing costs assistance should continue to be a component of homebuyer programs targeted at lower-income homebuyers.

Refinance Loan Denials by Race / Ethnicity - B/CS MSA			
Race / Ethnicity	% Denials	% in MSA	Top 2 Reasons
White	26.0%	75.0%	25% Credit / 24% Collateral
Black / African American	51.4%	11.3%	47% Credit / 23% Debt-to-Income
Hispanic / Latino	40.6%	20.0%	39% Credit / 20% Debt-to-Income

Total Applicants	% Denials	% in MSA
1,910	28.5%	100.0%

Source: 2008 FFIEC HMDA Data

Observation: According to HMDA data, both Black and Hispanic applicants experience higher refinance loan denial percentages as compared to their respective percentages of the population as a whole (40.1% and 20.6% higher for Blacks and Hispanics, respectively). Poor credit history rating remains the primary reason for loan denials (47% for Blacks and 39% for Hispanics), suggesting that consumer credit counseling and personal budgeting education should be a priority in the assistance provided by the city and other local housing assistance providers, and should be affirmatively marketed to minority populations.

Home Improvement Loan Denials by Race / Ethnicity - B/CS MSA			
Race / Ethnicity	% Denials	% in MSA	Top 2 Reasons
White	41.0%	75.0%	54% Credit / 16% Collateral
Black / African American	69.6%	11.3%	74% Credit / 11% Collateral
Hispanic / Latino	61.4%	20.0%	68% Credit / 11% Debt-to-Income

Total Applicants	% Denials	% in MSA
612	46.2%	100.0%

Source: 2008 FFIEC HMDA Data

Observation: HMDA data indicates that both Black and Hispanic applicants for home improvement loans experience very high denial rates as demonstrated in the table above. Denials are due, primarily, to poor credit history ratings (74% for Blacks and 68% for Hispanics). Loan denial percentages, as compared to respective percentages of the population as a whole, are 58.3% and 41.4% higher for Blacks and Hispanics, respectively. This data suggests that consumer credit counseling and homeowner education should be a priority in the assistance provided by the city and other local housing assistance providers, and should be affirmatively marketed to minority populations.

Bryan/College Station MSA Demographic Data
for use in
Analysis of Impediments to Fair Housing Choice

ACS Demographic	Estimate	Margin of Error	Percent	Margin of Error
SEX AND AGE				
Total population	203,557	*****	203,557	(X)
Male	103,472	+/-347	50.8%	+/-0.2
Female	100,085	+/-347	49.2%	+/-0.2
Median age (years)	25.9	+/-0.2	(X)	(X)
Male	79,339	+/-139	50.2%	+/-0.1

ACS Demographic	Estimate	Margin of Error	Percent	Margin of Error
Female	78,610	+/-124	49.8%	+/-0.1
RACE				
Total population	203,557	****	203,557	(X)
White	152,671	+/-2,003	75.0%	✓ +/-1.0
Black or African American	23,001	+/-618	11.3%	✓ +/-0.3
American Indian and Alaska Native	446	+/-161	0.2%	+/-0.1
Asian	8,090	+/-303	4.0%	+/-0.1
Native Hawaiian and Other Pacific Islander	260	+/-177	0.1%	+/-0.1
Some other race	14,164	+/-1,910	7.0%	+/-0.9
Two or more races	4,925	+/-1,051	2.4%	+/-0.5
HISPANIC OR LATINO AND RACE				
Total population	203,557	****	203,557	(X)
Hispanic or Latino (of any race)	40,792	****	20.0%	✓ ****
Not Hispanic or Latino	162,765	****	80.0%	****
Source: U.S. Census Bureau, 2006-2008 American Community Survey ✓ - Denotes data used in Analysis of Impediments				

Rental Housing: Rental housing is of primary concern, as this housing type originates most fair housing complaints in Bryan.

- Advertising: A review of advertising by rental housing providers indicates no overtly discriminatory practices, however, it should be noted that only a small minority of providers utilize the equal housing opportunity logo in their advertising. Though few models are used, use of human models is almost always exclusively Whites. Also omitted from advertising are any references to units available for handicapped residents, or any use of Spanish language. A large proportion of newspaper ads indicate "No HUD". Most apartment and property management websites do display the equal housing logo, although it is interesting to note that the local Bryan/College Station Apartment Association does not.
- Steering based on protected class status: There is no indication of steering based upon protected class status in the rental housing market in Bryan.
- Affirmative Marketing Programs: The City of Bryan has not participated in a rental development of five or more units, and has not received documentation of any affirmative marketing programs. However, in the future, if the city participates in a development of five or more units, an affirmative marketing plan will be required.

Sale of Existing Housing

- Steering based on protected class status: There is no evidence of steering the sales market. The local Regional Association of Realtors conducts regular training programs regarding non-discrimination.
- Advertising: A review of advertising by rental housing providers indicates no overtly discriminatory practices. Many Realty companies display the equal housing logo on their printed advertisements, however many do not. Almost all do display the logo on their websites, however. Most photographs and pictures in printed material do incorporate diverse models.

- Affirmative Marketing Programs/VAMAs: VAMAs are required for federally insured or assisted housing units. However there is not a centralized, accessible database to determine if any have been submitted to HUD.

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

- Group home issues: Group homes are allowable by Conditional Use Permit or in multifamily-zoned districts. There are two (2) current group homes in Bryan.
- Familial status: Currently, the limit of unrelated occupants in a residential dwelling is set at four persons, though a Residential Conservation District allows only 2 unrelated adults.
- Public housing: There are public housing units in the City of Bryan operated by the Public Housing Authority of the City of Bryan.
- Homeless persons: No ordinance other than those relating to securing unsafe structures address homelessness or vagrancy.

Potential Areas of Discriminatory Practices and Identification of Impediments:

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

§ 92.010 OCCUPANCY LIMITS. (a) Except as provided by Subsection (b), the maximum number of adults that a landlord may allow to occupy a dwelling is three times the number of bedrooms in the dwelling. (b) A landlord may allow an occupancy rate of more than three adult tenants per bedroom: (1) to the extent that the landlord is required by a state or federal fair housing law to allow a higher occupancy rate; or (2) if an adult whose occupancy causes a violation of Subsection (a) is seeking temporary sanctuary from family violence, as defined by Section 71. 004, Family Code, for a period that does not exceed one month. (c) An individual who owns or leases a dwelling within 3,000 feet of a dwelling as to which a landlord has violated this section, or a governmental entity or civic association acting on behalf of the individual, may file suit against a landlord to enjoin the violation. A party who prevails in a suit under this subsection may recover court costs and reasonable attorney's fees from the other party. In addition to court costs and reasonable attorney's fees, a plaintiff who prevails under this subsection may recover from the landlord \$500 for each violation of this section. (d) In this section: (1) "Adult" means an individual 18 years of age or older. (2) "Bedroom" means an area of a dwelling intended as sleeping quarters. The term does not include a kitchen, dining room, bathroom, living room, utility room, or closet or storage area of a dwelling. Added by Acts 1993,

73rd Leg., ch. 937, § 1, eff. Sept. 1, 1993. Amended by Acts 2003, 78th Leg., ch. 1276, § 7.002(o), eff. Sept. 1, 2003.

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

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

These provisions are not intended to limit the applicability of any *reasonable* local, State, or Federal restrictions on the maximum number of occupants permitted to occupy a dwelling unit. A number of jurisdictions limit the number of occupants per unit based on a minimum number of square feet in the unit or the sleeping areas of the unit. *Reasonable* limitations by governments would be allowed to continue, as long as they were applied to all occupants, and did not operate to discriminate on the basis of race, color, religion, sex, national origin, handicap or familial status. *Id.* at 31; *see also Edmonds*, 514 U.S. at 735 n.8 (quoting legislative history). (Emphasis added)

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

Housing Availability and Affordability Profiles

General Market and Inventory

In 2000, Bryan had a total of 63,038 persons living in 25,703 dwelling units (du) for a dwelling unit density of 2.45 persons/du. U.S. Census Bureau estimates for dwelling units and population show a total population of 66,819 and a total of 28,421 dwelling units in 2008. A more recent calculation of Bryan's population and housing inventory by the City of Bryan's Planning Department estimates a total population of 73,972 and approximately 29,900 dwelling units. While the U.S. Census Bureau's most recent estimates show a reduced density ratio (2.35 persons/du), the city calculations show an increased density ratio of 2.54 persons/du. This slight increase in dwelling unit density indicates an increased housing demand locally and suggests that local housing development may be lagging behind demand. An upward trend in density and demand may eventually result in increased shelter cost and burden the area's low and moderate income citizens more severely than other income groups (See charts below).

Single-Family Housing Affordability

In terms of affordability, the single-family housing in the Bryan-College Station MSA is somewhat less affordable than comparable markets. A comparison of similar sized university communities reveals a slight lack of affordability in the Bryan-College Station market. The following chart shows that the city's market is slightly less affordable than Abilene, Denton, Lubbock, Nacogdoches, Tyler and Waco and slightly less affordable than the Texas market at large. A ratio of 1.0 indicates that the median family

income is exactly equal to the income that a lender would require for the family to purchase a median-price dwelling. A ratio greater than 1.0 means that median-income families earn more than enough needed to buy a median-priced house. While the local market may be somewhat less affordable than similar Texas markets, we are slightly more affordable than the national market. The trend for the state, national and local markets, however, has seen affordability increase each year since 2007.

Housing Affordability Comparison

Texas MLS Area	3 rd Quarter 2009	2008	2007
Bryan-College Station	1.80	1.64	1.50
Abilene	2.07	2.01	1.78
Denton	2.19	1.98	1.54
Lubbock	2.28	1.93	1.91
Nacogdoches	2.16	1.56	1.47
Tyler	1.99	1.68	1.55
Waco	2.18	1.84	1.78
Texas	1.84	1.59	1.45
USA	1.57	1.33	1.11

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

Local Rental Housing Market

According to the city's building permit reports, Bryan's rental housing development slowed two of the last three years as the market absorbed the units built during the first several years of the last decade. The year 2008 was an exception, which saw a significant increase in both numbers and values of new units. Otherwise, a slight decline in multi-family construction allowed rental rates to remain steady, and occupancy rates to improve somewhat. Follow is information pertinent to the local rental market.

- The average rental cost per square foot locally in 2008 was \$0.78 as compared to the higher rate of \$0.83 for the Texas Metro Average. This demonstrates a slightly more affordable rental market locally, as compared to other Texas metropolitan markets. Following is information from the Real Estate Center at Texas A&M University providing the most current apartment statistic for our metro area.

Bryan-College Station Apartment 2008 Statistics

Rent / Occupancy	Bryan/College Station	Texas Metro Average
Average rent per square foot	\$0.78	\$0.83
Average occupancy rate	95.8%	93.9%

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

- Permits for 1363 multi-family rental units were issued in Bryan between 2005 and the end of 2009, with a large increase in Bryan apartment development in 2007 and even larger in 2008. A correlating spike in apartment construction also seen in the Bryan – College Station MSA as a whole in 2008. Much smaller numbers of new apartment constructions was observed in 2009 for both Bryan and College Station, suggesting moderation due to the economic slowdown of 2009-2010. Permits for multi-family rental units in early 2010 continue to be slow as compared to previous years.
- The fall semester enrollment for incoming freshmen at Texas A&M University was at an all-time-high, and Blinn College continues to grow, therefore the local residential rental demand will be healthy. These two institutions represent approximately 57,000 students, of which approximately 48,000 rely on off-campus housing.

- The following two charts show the average occupancy and rental rates for the Bryan-College Station MSA. Information is also presented to provide a comparison between the local market's rental rates and the U.S. Department of HUD's published Fair Market Rental Rates.

Average Overall Occupancy and Rental Rates Bryan/College Station, April 2009	
Average Overall Occupancy	93.9%
Overall Rental Rates	
Average Market Rent / Sq. Ft.	\$0.836
0 Bedroom (Studio)	\$1.090
1 Bedroom	\$0.932
2 Bedroom	\$0.758
3 Bedroom	\$0.777
4 Bedroom	\$0.754
Average Market Rent / Unit	\$684.98
0 Bedroom (Studio)	\$519.85
1 Bedroom	\$612.67
2 Bedroom	\$696.25
3 Bedroom	\$911.54
4 Bedroom	\$1,206.00

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

Average Rental Rates as Compared to Fair Market Rates Bryan/College Station, 2009		
Size / Type Unit	Average Market Rent / Unit	FY2009 Fair Market Rents
0 Bedroom (Studio)	\$519.85	\$591.00
1 Bedroom	\$612.67	\$668.00
2 Bedroom	\$696.25	\$816.00
3 Bedroom	\$911.54	\$1,034.00
4 Bedroom	\$1,206.00	\$1,066.00

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

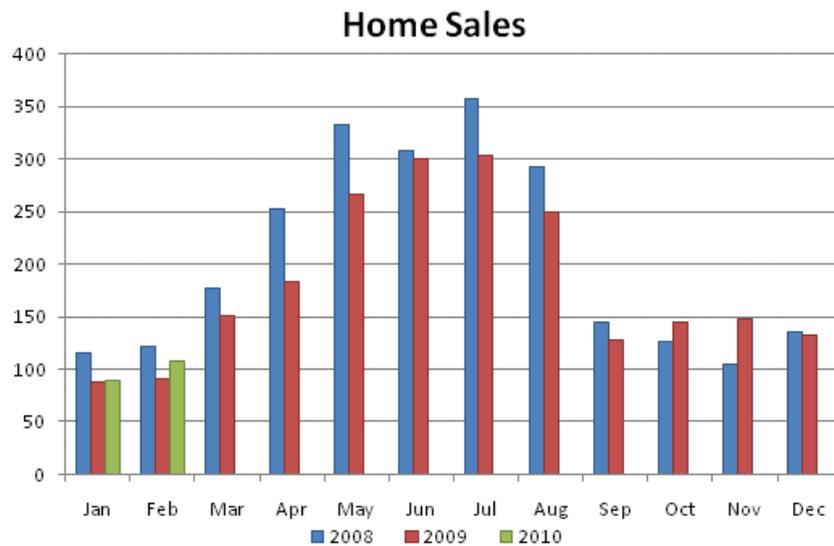
- At \$911.54 in rent per month, a four person, moderate-income family (80% of AMI - \$44,900 annual income), will spend 20% of its annual income on rent for a three bedroom apartment. This is an affordable monthly rent based on income.
- At \$911.54 in rent per month, a four person, low-income family (50% of AMI - \$28,050 annual income), will spend 32% of its annual income on rent for a three bedroom apartment. This is a marginally affordable monthly rent based on income.
- At \$911.54 in rent per month, a four person, very-low income family (30% of AMI - \$16,850 annual income), will spend 67% of its annual income on rent for a three bedroom apartment. This is not an affordable monthly rent based on income.
- As the chart above indicates, the local average market rents per unit are typically reasonable, as compared to the U.S. Department of HUD's published Fair Market Rents for our Metropolitan Statistical Areas. One exception is the average market rent for 4-bedroom units, which calculates to be approximately 13% higher than published Fair Market Rent for our market.

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

Local Single Family Sales Market

The local single-family sales market has seen a decrease in the number of homes sold over the last three years, however there has been a continued increase in the average sales price of homes sold. While number of sales in early 2010 are slightly ahead of 2009 numbers (see Bryan-College Station MLS Residential Housing Activity Chart below), they still lag behind the sale numbers recorded for the same period in 2008.

**Bryan-College Station MLS Residential Housing Activity
January 2008 – February 2010**



Date	Sales	Dollar Volume	Average Price	Median Price	Total Listings	Months Inventory
2008-Jan	115	17,200,000	149,600	134,500	1,165	5.6
Feb	122	19,875,000	162,900	129,600	1,351	6.5
Mar	177	28,845,000	163,000	139,700	1,407	6.8
Apr	253	42,535,000	168,100	143,200	1,355	6.5
May	333	52,315,000	157,100	139,200	1,333	6.3
Jun	308	51,760,000	168,100	144,400	1,181	5.7

Jul	358	61,625,000	172,100	154,500	1,218	5.7
Aug	293	52,620,000	179,600	150,700	1,139	5.4
Sep	145	23,850,000	164,500	141,300	1,135	5.3
Oct	126	20,650,000	163,900	148,000	1,057	5.0
Nov	105	16,575,000	157,900	139,200	1,051	5.0
Dec	136	24,305,000	178,700	148,000	1,031	5.0
2009-Jan	87	15,145,000	174,100	155,500	1,111	5.5
Feb	91	15,405,000	169,300	139,500	1,188	5.9
Mar	151	24,400,000	161,600	151,200	1,265	6.4
Apr	183	28,425,000	155,300	142,800	1,272	6.6
May	266	45,105,000	169,600	149,400	1,254	6.7
Jun	300	50,785,000	169,300	149,800	1,253	6.7
Jul	304	49,725,000	163,600	151,000	1,233	6.8
Aug	249	42,585,000	171,000	147,900	1,222	6.8
Sep	128	21,920,000	171,200	152,500	1,243	7.0
Oct	144	25,607,134	177,800	148,800	1,216	6.8
Nov	148	24,835,261	167,800	149,300	1,175	6.4
Dec	133	23,518,518	176,800	157,200	1,114	6.1
2010-Jan	89	15,151,050	170,200	151,900	1,298	7.1
Feb	107	19,685,773	184,000	165,300	1,439	7.8

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

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

February of 2010 saw the highest number of MLS listings for one month (1,439) seen in the previous two years. Review of Housing Price Index (HPI) information from the Federal Housing Finance Agency for the last five years ending in December of 2009 shows that, with the exception of the third quarter of 2009, healthy home price increases are seen as compared to the same reporting quarter of each previous year.

The rise in HPI for 2009 was, however, less dramatic than the HPI for the four quarters in 2008. However, in comparing the Bryan-College Station to two other comparably sized, university communities in Texas (Lubbock and Waco), we find that over the last twenty quarters, the Bryan-College Station reported HPI's have been calculated higher eleven times, compared to Lubbock's and Waco's three and six times, respectively.

The Bryan-College Station HPI also compares favorably to the Texas HPI's for 2007 and 2008. This is another indication of a relatively healthy single-family sales market locally. One element of the MLS Residential Housing Activity chart below that may indicate a coming softening of the local single-family market is the slightly elevated inventory calculated for the first two months of 2010. This elevated inventory may temporarily slow the increase in home prices, which may be advantageous to first-time and lower income buyers trying to enter the market. However, the current economic slow-down may negate any advantage that first-time and lower income buyers may realize.

MSA HPI Comparison for B/CS, Lubbock, and Waco
Four-Quarter Percent Change in FHFA MSA-Level House Price Indexes

Year	Quarter	B/CS	Lubbock	Waco
2009	4	2.79	1.38	1.55
2009	3	0.62	2.67	2.30
2009	2	3.49	2.16	4.38
2009	1	5.78	2.08	3.16
2008	4	6.82	2.70	0.77
2008	3	6.02	2.52	2.11
2008	2	4.82	2.20	1.08
2008	1	2.79	4.10	1.78
2007	4	1.80	0.85	7.36
2007	3	3.86	1.56	2.57
2007	2	5.28	2.91	4.68
2007	1	7.11	2.33	5.04
2006	4	8.99	4.48	-2.58
2006	3	5.90	3.91	4.78
2006	2	4.68	3.55	3.49
2006	1	3.97	4.33	5.85
2005	4	2.56	3.12	6.87
2005	3	4.42	3.89	4.72
2005	2	4.50	4.42	4.73
2005	1	3.71	4.34	3.15

Source: Federal Housing Finance Agency

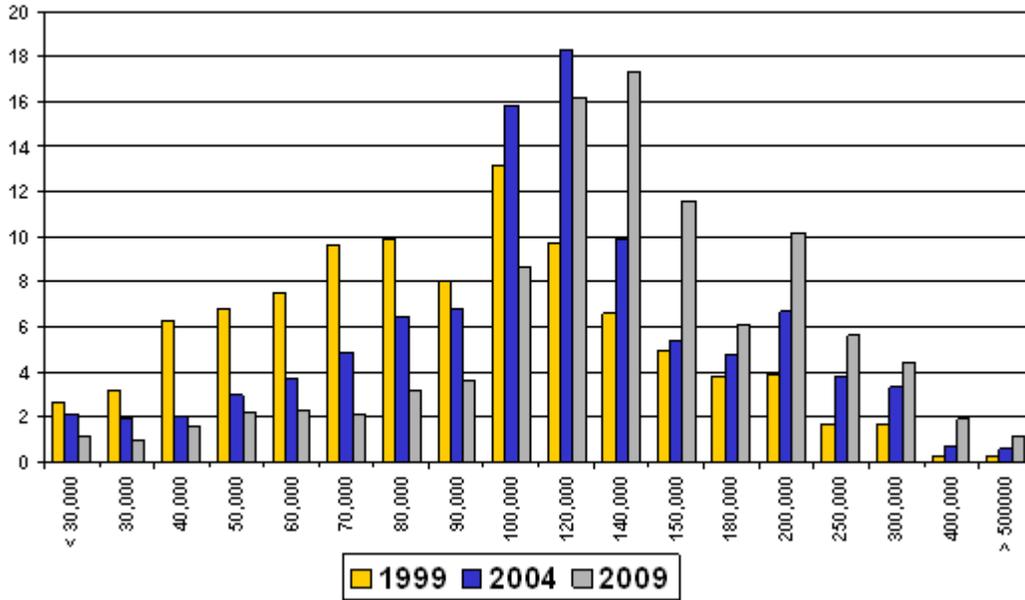
B/CS MSA Housing Price Index (HPI) Comparison
Four-Quarter Percent Change in Level House Price Indexes
(All Transactions Index, 2009Q4)

Year	Quarter	B/CS	Texas
2009	4	2.79	0.83
2009	3	0.62	-0.17
2009	2	3.49	-0.01
2009	1	5.78	-0.10
2008	4	6.82	0.16
2008	3	6.02	1.17
2008	2	4.82	1.63
2008	1	2.79	2.11
2007	4	1.80	3.58
2007	3	3.86	5.15
2007	2	5.28	6.06
2007	1	7.11	6.34
2006	4	8.99	6.65
2006	3	5.90	6.25
2006	2	4.68	6.15
2006	1	3.97	6.47
2005	4	2.56	5.91
2005	3	4.42	5.42
2005	2	4.50	4.62
2005	1	3.71	4.13

Source: Federal Housing Finance Agency

After a five to six year increase in the number of homes sold in Bryan-College Station, the number of homes sold declined in 2007, 2008 and 2009, while the average sales price continued to rise. In the city's 20005-2009 5-Year Consolidated Plan, the largest two price ranges of homes sold were \$110,000 - \$119,999 (15.8%) and \$120,000 - \$139,999 (18.3%). In 2009, the two highest percent ranges shifted up to \$119,999 - \$139,999 (16.2%) and \$140,000 - \$159,999 (17.3%). The following charts and graphs demonstrate how the price distribution of single-family homes sold in local market has, over the last decade, shifted from being predominately in the \$70,000 to \$120,000 range in 1999 (median – \$95,000; average - \$111,000), to the \$100,000 to \$160,000 range in 2004 (median – \$123,700; average - \$139,300), and finally to the \$120,000 to \$200,000 in 2009 (median – \$149,500; average - \$168,200). This demonstrates the consistent upward trend of local single-family home prices, even while the volume of sales sometimes trends downward.

Price Distribution of MLS Homes Sold in Bryan-College Station

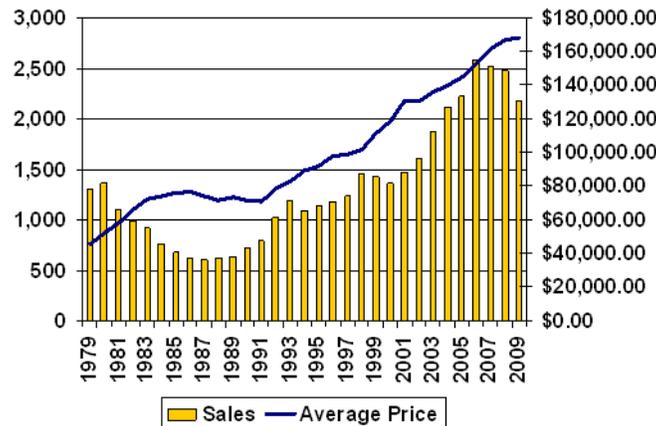


Price Range	Percent Distribution										
	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
\$29,999 or less	2.7	2.2	1.6	0.8	1.5	2.1	2.2	1.2	1.2	1.7	1.1
30,000 - 39,999	3.2	1.8	1.4	1.6	1.4	1.9	1.9	1.0	1.6	1.4	1.0
40,000 - 49,999	6.3	3.1	2.5	1.9	2.1	2.0	2.0	1.5	1.9	1.2	1.6
50,000 - 59,999	6.8	5.5	4.1	5.4	3.4	3.0	3.2	3.0	2.7	2.9	2.2
60,000 - 69,999	7.5	6.2	5.1	3.3	3.4	3.7	3.2	3.2	2.9	2.7	2.3
70,000 - 79,999	9.6	9.5	6.4	6.9	5.4	4.9	4.1	3.4	3.2	2.9	2.1
80,000 - 89,999	9.9	10.5	8.7	8.3	6.4	6.5	5.6	5.1	4.1	4.0	3.2
90,000 - 99,999	8.0	9.5	6.8	8.1	6.4	6.8	5.7	4.7	3.5	4.8	3.6
100,000 - 119,999	13.1	14.3	15.9	17.2	17.0	15.8	13.7	13.8	9.6	7.9	8.7
120,000 - 139,999	9.7	11.0	14.4	16.4	18.6	18.3	18.1	17.2	20.2	17.3	16.2
140,000 - 159,999	6.6	6.4	8.4	7.2	9.8	9.9	12.5	14.8	14.2	15.1	17.3
160,000 - 179,999	5.0	6.0	7.3	5.7	6.8	5.4	6.5	8.2	9.0	10.5	11.6
180,000 - 199,999	3.8	4.4	5.8	5.9	4.3	4.8	4.8	5.2	4.7	5.7	6.1
200,000 - 249,999	3.9	4.9	5.5	5.7	7.6	6.7	8.1	7.4	8.1	8.3	10.2
250,000 - 299,999	1.7	2.4	3.0	2.9	2.3	3.8	3.4	4.0	5.4	4.9	5.6
300,000 - 399,999	1.7	2.0	2.2	1.7	2.8	3.3	3.2	4.0	4.3	4.5	4.4
400,000 - 499,999	0.3	0.1	0.5	0.6	0.5	0.7	1.2	1.2	2.0	2.1	1.9
500,000 and more	0.3	0.1	0.3	0.4	0.3	0.6	0.7	1.0	1.2	2.0	1.1

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

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

Bryan-College Station MLS Residential Housing Activity



Date	Sales	Dollar Volume	Average Price	Median Price	Total Listings	Months Inventory
1979	1,303	59,585,186	45,700	-	-	-
1980	1,356	70,682,091	52,100	-	-	-
1981	1,093	63,671,033	58,300	-	-	-
1982	988	64,976,549	65,800	-	-	-
1983	915	66,159,992	72,300	-	-	-
1984	755	55,891,632	74,000	-	-	-
1985	678	51,227,892	75,600	-	-	-
1986	609	46,403,303	76,200	-	-	-
1987	595	44,086,518	74,100	-	-	-
1988	621	44,396,192	71,500	-	-	-
1989	636	46,409,286	73,000	62,600	895	17.7
1990	716	50,872,164	71,100	62,500	798	13.6
1991	793	56,021,696	70,600	63,700	656	10.8
1992	1,023	79,972,169	78,200	68,300	520	7.0
1993	1,186	98,089,804	82,700	73,600	450	4.8
1994	1,080	96,041,493	88,900	77,700	542	5.6
1995	1,136	104,305,773	91,800	80,500	540	6.1
1996	1,183	115,545,000	97,700	84,300	603	6.1
1997	1,232	121,340,000	98,500	84,200	623	6.3
1998	1,448	147,200,000	101,700	88,600	598	5.4
1999	1,421	157,770,000	111,000	95,000	528	4.3
2000	1,356	160,825,000	118,600	102,200	560	4.9
2001	1,458	190,570,000	130,700	116,600	710	6.0
2002	1,601	208,760,000	130,400	116,000	768	6.0
2003	1,876	255,230,000	136,100	123,300	992	7.0
2004	2,117	294,945,000	139,300	123,700	1,157	6.9

2005	2,221	321,430,000	144,700	129,400	1,165	6.4
2006	2,580	394,225,000	152,800	135,100	1,236	6.2
2007	2,514	404,540,000	160,900	138,900	1,228	5.7
2008	2,471	412,155,000	166,800	144,200	1,202	5.7
2009	2,184	367,455,913	168,200	149,500	1,212	6.5

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

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

Housing Needs

This section details the housing needs among the low income population groups of the city with respect to Section 91.205(b) of the Consolidated Plan regulations. These observations are based on the 2000 HUD CHAS data. The regulations define housing needs as any form of cost burden, overcrowding or deteriorating housing condition.

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

Table 1

Household by Type, Income, & Housing Problem	Renters					Owners					Total Households
	Elderly	Small Related	Large Related	All other	Total Renters	Elderly	Small Related	Large Related	All other	Total Owners	
Income <=50% MFI	574	1,658	533	2,395	5,160	792	497	319	448	2,056	7,216
Income <=30% MFI	362	935	304	1,530	3,131	404	223	130	219	976	4,107
% with any housing problems	76.2	83.2	82.6	83.9	82.7	77.7	79.8	86.2	64.8	76.4	81.2
%Cost Burden >30%	76.2	76.8	68.1	83.6	79.2	77.7	78.0	60.0	64.8	72.5	77.6
%Cost Burden >50%	49.2	63.6	53.9	78.4	68.3	51.7	67.3	44.6	58.4	55.8	65.3
Income >30 to <=50 % MFI	212	723	229	865	2,029	388	274	189	229	1,080	3,109
% with any housing problems	62.3	77.5	79.0	92.1	82.3	41.5	68.6	84.1	64.2	60.6	74.8
%Cost Burden >30%	62.3	72.2	49.3	89.9	76.1	41.5	55.8	34.9	59.8	47.9	66.3
%Cost Burden >50%	29.2	19.8	14.8	39.8	28.7	14.9	23.0	20.1	34.9	22.1	26.4
Income >50 to <=80%	219	993	250	1,085	2,547	537	629	364	389	1,919	4,466
% with any housing problems	58.9	48.3	86.4	47.3	52.5	16.8	46.3	78.8	37.8	42.5	48.2
%Cost Burden >30%	58.9	35.0	21.2	45.4	40.2	16.8	46.3	36.3	37.8	34.4	37.7
%Cost Burden >50%	18.3	5.2	5.6	1.8	4.9	7.8	3.7	0.0	16.7	6.8	5.7
Total Households (all income levels)	1,060	4,348	1,170	4,874	11,452	3,057	5,516	1,735	1,714	12,022	23,474
% with any housing problems	57.3	46.2	75.6	54.5	53.8	20.4	17.7	51.7	32.6	25.4	39.3
%Cost Burden >30%	57.3	37.8	31.9	53.3	45.6	20.4	15.2	18.5	31.4	19.3	32.1
%Cost Burden >50%	29.2	18.2	18.1	32.1	25.1	10.4	4.5	5.5	16.7	7.9	16.3

Source: CHAS Table F5A, F5B, F5C, F5 as of 2000

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

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

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

- Elderly (1 or 2 member households with either person being 62 or older)
- Small Household (2-4 people)
- Large Household (5 or more people)
- All Other Households

Out of 23,474 households, 39.3% of them have housing problems. The data shows that large related households of renters and owners have significant housing problems. 75.6% of renters and 51.7% of owners within the group have cost burden, overcrowding, or deteriorating housing conditions. Group-wise, 53.8% of renters have any housing problem compared to 25.4% of owners. Households earning 50% or below of MFI had the worse percentage of housing problems with significant more cost burden.

Cost Burden

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

- Renters have more cost burden compared to owners. 45.6% of renters are cost burdened (spending between 30-50% of income on housing) and 25.1% of renters are severely cost burdened (spending over 50% of income on housing). This is, however, somewhat misleading since the large of student population skews the data making it appear that the renter population is more acutely burdened. This is also applicable to the lowest income category of renters (30% or less of the MFI) as student populations appear in data as very low income.
- Extremely low income households (renters and owners) have more cost burden than any group. 77.6% are cost burdened and 65.3% are severely cost burdened.

Racial / Ethnic Housing Need

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

The data shows that only three race or ethnic groups have extremely elevated housing need: Native American, Asian, and Hispanic. While a very small percentage of the local population, Native American renters are in elevated housing need across all three income levels shown (100%, 100%, and 77.8%). In addition, very low income Native American owners (100%) experience elevated housing need. Also a smaller percentage of the population, very low income Asian populations experience elevated housing need. Both owners and renters in this group, 100%, in fact, suffer from severe housing needs. As noted above, Native American and Asian populations in Bryan are very small. The 2000 Census listed 532 Native Americans and 1,256 Asians living in Bryan. The following discussion elaborates on a greater segment of the City’s population that experience elevated housing need: Hispanics.

The 2000 Census showed that 27.8% of the City of Bryan was Hispanic of any race. This amounted to 18,271 persons - the largest minority in Bryan. Data also suggests that Hispanic owners are the largest population experiencing elevated housing need. Among all very low income owners (31-50%MFI), 60.6% suffer severe housing problems. Among Hispanics, however, this figure jumps to 72.1%. Again, examining another income group, among all low income owners (51-80%MFI), 42.5% suffer severe housing problems. Among Hispanics, however, the figure is 52.9%, again, demonstrating an elevated housing need among this ethnic group.

Table 2

	Renters with Housing Problems		
	0-30% MFI - Extremely Low	31-50% MFI - Very Low	51-80% MFI - Low
% of all households with any housing problem	82.7%	82.3%	52.5%
White, Non-Hispanic	84.0%	90.1%	54.7%
Black, Non-Hispanic	83.5%	79.4%	29.0%
Asian	78.0%	100%	0.0%
Native American	100%	100%	77.8%
Hispanic	75.7%	67.3%	59.5%

Source: CHAS Tables A1A, A1B, A1C, A1D, F5A, F5B, F5C, F5D

Table 3

	Owners with Housing Problems		
	0-30% MFI - Extremely Low	31-50% MFI - Very Low	51-80% MFI - Low
% of all households with any housing problem	76.4%	60.6%	42.5%
White, Non-Hispanic	85.3%	57.1%	35.1%
Black, Non-Hispanic	70.0%	57.8%	48.4%
Asian	0.0%	100%	50%
Native American	N/A	100%	N/A
Hispanic	72.9%	72.1%	52.9%

Source: CHAS Tables A1A, A1B, A1C, A1D, F5A, F5B, F5C, F5D

Housing Needs for the Elderly/Disabled

As defined above, elderly households are 1 and 2 member household with each person being 62 or older. Table 1 outlines the housing problems for this group. Out of 1,060 elderly renters, 57.3% have a housing problem. Out of 3,057 elderly owners, 20.4% have a housing problem. Again, renters have more housing problems than owners, like much of the City. In addition, 76.2% of extremely low income elderly renters and 77.7% of extremely low income elderly owners have housing problems. Again, like the City as a whole, the lower income households have experience elevated housing need.

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

Table 4

Income Level	Disabled Renters with any Housing Problem			Total Renters
	Extra Elderly	Elderly	All Other	
Extremely Low 0-30% MFI	75.8%	88.1%	78.8%	79.8%
Very Low 31-50% MFI	100%	64.6%	72.0%	74.3%
Low 51-80% MFI	57.7%	89.5%	66.4%	66.3%

Source: CHAS Tables A7A, A7B, A7C

Table 5

Income Level	Disabled Owners with any Housing Problem			
	Extra Elderly	Elderly	All Other	Total Owners
Extremely Low 0-30% MFI	76.7%	89.6%	76.4%	80.7%
Very Low 31-50% MFI	36.8%	22.2%	90.8%	61.1%
Low 51-80% MFI	9.2%	20.9%	42.6%	22.5%

Source: CHAS Tables A7A, A7B, A7C

Amongst the disabled, housing problems follow a similar path as with most of the City. Out of 1,314 disabled renters, 66.1% have a housing problem. Out of 2,068 disabled owners, 29.5% have a housing problem. Again, the renters fair worse than the owners. The data also demonstrates that the lowest incomes have substantially more housing problems.

The data allows us to see which groups are in higher need. Among renters, the very low income disabled extra elderly and low income disabled elderly have significantly higher rates of housing problems, 100% and 89.5%, respectively. Among owners, the category listed as “all other” displays the need. Very low income and low income persons in this category are in great need, 90.8% and 42.6% respectively. The “all other” category are those not elderly, but with mobility and/or self-care limitations as defined by the CHAS reports.

Large Household Needs

The CHAS data in Table 6 also shows that large households in Bryan tend to have more housing problems than any other group listed. Of total renters in Bryan, 53.8% reported housing problems. Among large households who rent, this figure jumps to 75.6%. Of total owners in Bryan, 25.4% reported housing problems. Among large households who own, this figure increases to 51.7%. When lower income renters and owners (80% income, or less) are examined separately, the need of larger families, renter and owner, assistance becomes most apparent. Of that group, 82.7% of large family renters and 83.0% of large family owners experience significant housing problems.

Table 6

	Renters with a Housing Problem	Owners with a Housing Problem
Small Households (2-4 people)	46.2% (all income levels)	17.7% (all income levels)
	69.7% (80% income and below)	64.9% (80% income and below)
Large Households (5 or more people)	75.6% (all income levels)	51.7% (all income levels)
	82.7% (80% income and below)	83.0% (80% income and below)

Summary Observations

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

- An increase in dwelling unit density indicates increased housing demand locally, suggesting that local housing development may be lagging behind demand. An upward trend in density and demand may result in increased shelter cost and burden the area's low and moderate income citizens.

- Local single-family housing is somewhat less affordable than similar sized university communities in Texas, but is slightly more affordable than the national market. The trend, however, has seen affordability increasing locally.
- Occupancy for local apartments in 2008 was 95.8% as compared to the Texas Metro Average of 93.9%, and average rental cost per square foot was \$0.78 as compared to the higher rate of \$0.83 for the Texas Metro Average, demonstrating a more affordable rental market locally, as compared to other Texas markets.
- Latino/Hispanic populations are our largest minority group and the largest ethnic group with elevated housing problems.
- The highest occurrence of housing problems across all ethnic and racial groups is seen in the extremely low income category. Renters and owners in this income range have higher cost burden than any group. 77.6% are cost burdened and 65.3% are severely cost burdened.
- The older central, west and northern neighborhoods (mostly located in Census Tracts 5, 6.03 and 6.04) have the highest number of poorly maintained residential properties needing rehabilitation.
- Combined, Texas A&M University and Blinn College represent a total college student demand on the local housing market of approximately 48,000 students, which tends to increase rental rates to the disadvantage of non-student renters.
- The local Housing Price Index (HPI) compares favorably to the Texas HPI's for 2007 and 2008 - indicating a healthy single-family sales market. However, an elevated inventory in early 2010 may slow increases in home prices – an advantage to new buyers entering the market. Current economic conditions may, however, negate any advantage by reduced incomes and savings.
- Renters have more cost burden compared to owners. 45.6% of renters are cost burdened (spending between 30-50% of income on housing) and 25.1% of renters are severely cost burdened (spending over 50% of income on housing).
- While a very small percentage of the local population, Native American renters show very high housing problems across all three income levels shown (100%, 100%, and 77.8%). In addition, very low income Native American owners (100%) experience elevated housing need.
- Also a smaller percentage of the population, very low income Asian populations experience extremely high housing problems. Of both owners and renters in this group, 100%, experience severe housing needs.
- Hispanic owners are the largest minority group experiencing elevated housing need. Among very low income (31-50%MFI) Hispanic owners, 72.1% experience elevated need. Among low income (51-80%MFI) Hispanic owners, 52.9% have housing problems.
- 76.2% of extremely low income elderly renters and 77.7% of extremely low income elderly owners have housing problems.
- Very low income disabled extra elderly and low income disabled elderly have significantly higher rates of housing problems, 100% and 89.5%, respectively. Among owners, the category listed as “all other” displays the need. Very low income persons in this category are in great need, 90.8%.

- Census data shows that large lower income households in Bryan tend to have more housing problems than any other group listed. Of that group, 82.7% of large family renters and 83.0% of large family owners experience significant housing problems.

Employment Opportunities

- **Employment Opportunities:** For the previous 12 months ending in February 2010, the Texas Workforce Commission ranks the Bryan-College Station area with the highest employment growth rate of all Texas metropolitan areas. As compared to other state metro areas, the local market is demonstrating stability that will benefit the residential rental market for both property owners and renters alike. Local employment has declined 2.1% on average during the 2009.
- **Creation of Job Opportunities:** Each year, Texas A&M's 2,500 faculty conduct approximately \$500 million worth of sponsored research projects, assisted by more than 5,000 paid graduate students. Additionally, approximately 3,000 undergraduates each year also conduct independent research with faculty supervision. Texas A&M's rare triple designation as a Land-, Sea- and Space-Grant institution reflects the broad scope of its research endeavors, with ongoing projects funded by such prominent and diverse agencies as NASA, the National Institutes of Health, the National Science Foundation and the Office of Naval Research.
- **Barriers to Job Opportunities:** There are no known barriers to job opportunities in Bryan. The unemployment rate typically is very low, and it is expected that competition for employees among a growing business community will remain strong.
 - **Incentives for Corporate Relocation:** The City of Bryan incentive program is designed to encourage targeted business growth and development. Qualified economic development prospects creating significant capital investment, employment and payroll may be eligible for incentives tailored to individual business needs. Incentives may include:
 - **Tax Abatements** - An abatement of ad valorem taxes for a period of up to 10 years on increase of value on real and/or personal property.
 - **Land at Reduced Prices or Land Grants** - A reduction in price for property or the grant of land.
 - **Waiver of Select Municipal Permits and Fees** - Certain municipal fees may be waived on items such as tap and meter fees and construction permits.
 - **Fast Track Permitting** - The development process may be expedited through predevelopment and other special-called meetings, slab only permitting, etc.
 - **Grants** - Various grants tailored to business needs.
 - **Tax Increment Financing (TIF)** - Tax increment financing of public improvements to provide water and wastewater lines, roads, and other improvement projects deemed necessary for development.
- **CDBG Funding of Infrastructure for New Business Development:** The City of Bryan CDBG funds have been used for infrastructure development in low and moderate income areas of the City. Recent developments include the installation of sidewalks along a 2.5 mile length of Martin Luther King Jr. Street utilizing CDBG-R funding. These infrastructure improvements help to improve pedestrian access to retain business and attract new employers as well.
- **Job Training Programs:**
 - Workforce Training - Workforce training assistance can be provided through:
 - Brazos Valley Community Action Agency JOBS Program

- Texas Department of Economic Development Smart Jobs program
 - Blinn College – Bryan Campus
 - Texas Engineering and Extension Service (TEEX)
 - Brazos Valley Council of Governments Workforce Center
- **Welfare to Work Programs** (State/Local/CDBG Funding): The State of Texas Department of Health and Human Services and the Texas Workforce Commission provide welfare to work programs.
 - **Evaluation of Employment Opportunities:** The College Station-Bryan Metropolitan Statistical Area is projected to continue to experience moderate growth.

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

The Research Valley Major Employers

Employer	Category	Employees
Bryan ISD	Education	1,000+
City of College Station	Government	1,000+
College Station ISD	Education	1,000+
Reynolds & Reynolds	Computer Hardware/Software	1,000+
Sanderson Farms	Food Processing	1,000+
St. Joseph Regional Hospital	Health Care	1,000+
Texas A&M University System	Education	1,000+
Blinn College, Bryan Campus	Education	500-999
Brazos County	Government	500-999
City of Bryan	Government	500-999
College Station Medical Center	Health Care	500-999
New Alenco Windows	Manufacturing	500-999
Scott & White Clinic	Health Care	500-999
Texas A&M Health Science Center	Education	500-999
Walmart	Retail	500-999
West Corporation	Telecommunications	500-999

Source: The Research Valley Partnership (internal survey, 2010) and Texas Workforce Commission (data for Brazos Valley Workforce Development Area, 4Q 2009)

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

Texas Metropolitan Area Non-farm Employment Change
Data as of March 2010

Metropolitan Area	1999	2009	% Change
McAllen-Edinburg-Mission	147,000	217,200	47.8
Laredo	65,500	87,400	33.4
Midland	52,400	66,400	26.7
Odessa	49,000	59,200	20.8
Bryan – College Station	80,400	96,400	19.9
Brownsville-Harlingen	103,900	124,300	19.6
Austin-Round Rock-San Marcos	635,400	758,200	19.3
Killeen-Temple-Fort Hood	106,300	125,100	17.7
Longview	81,500	94,500	16.0
Houston-Sugar Land-Baytown	2,202,000	2,539,000	15.3
San Antonio-New Braunfels	727,500	834,600	14.7
Tyler	81,200	92,800	14.3
Texas	9,155,000	10,309,100	12.6
Corpus Christi	163,200	177,400	8.7
Amarillo	101,700	110,400	8.6
Lubbock	119,300	129,400	8.5
El Paso	251,300	272,100	8.3
Texarkana	52,400	56,400	7.6
Dallas-Fort Worth-Arlington	2,663,600	2,864,300	7.5
Waco	100,400	106,200	5.8
Abilene	62,200	65,700	5.6
Victoria	48,400	49,000	1.2
San Angelo	43,800	43,900	0.2
Beaumont-Port Arthur	160,300	158,900	-0.9
Wichita Falls	61,100	58,700	-3.9
Sherman-Denison	45,100	42,600	-5.5

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

Educational Opportunities

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

BISD School District Profile

Fast Facts

Size	453 square miles
Enrollment	15,000
Expenditure per student	\$8,393
Total expenditures	\$121,659,653
Property value per student	\$189,039
2008 tax rate	\$1.29 per \$100 assessed valuation
Revenue sources	State, 50%
	Local, 49%
	Federal, 1%

Source: Bryan Independent School District

BISD Student Statistics

Grade Level	Number	Percent
Elementary (PK-5):	8,267	53.6%
Middle School (6-8):	3,297	21.4%
High School (9-12):	3,849	25.0%
Total:	15,413	100%

Source: Bryan Independent School District

BISD Ethnicity Demographics

Campus	American or Alaskan Native (%)	Asian or Pacific Islander (%)	Black, Not of Hispanic Origin (%)	Hispanic (%)	Caucasian/White, Not of Hispanic Origin (%)
Bonham	0.0	0.2	13.6	47.3	38.9
Bowen	0.0	1.4	18.6	19.3	60.6
Bryan Collegiate	0.0	0.5	17.7	58.6	23.2
Bryan High School	0.2	0.6	23.7	40.5	35.0
Carver	0.0	0.0	31.2	57.9	11.0
Crockett	0.2	1.2	28.8	58.5	11.4
Davila MS	0.0	0.0	22.6	50.9	26.4
Fannin	0.0	0.0	24.2	64.4	11.4
Henderson	0.0	0.6	10.5	65.5	23.4
Jane Long MS	0.0	0.4	24.7	57.4	17.5
Johnson	0.2	1.0	7.3	36.0	55.4

Campus	American or Alaskan Native (%)	Asian or Pacific Islander (%)	Black, Not of Hispanic Origin (%)	Hispanic (%)	Caucasian/White, Not of Hispanic Origin (%)
Jones	0.0	0.2	24.9	72.1	2.8
Juv. Justice Center	0.0	0.0	40.0	40.0	20.0
Kemp	0.0	0.2	43.6	50.8	5.4
Lamar Alternative	0.0	0.4	27.6	48.0	24.0
Mary Branch	0.2	1.4	32.8	31.0	34.6
Milam	0.0	0.0	17.3	76.6	6.1
Mitchell	0.0	0.4	30.8	21.5	47.3
Navarro	0.0	0.2	19.8	57.6	22.4
Neal	0.0	0.0	25.7	72.6	1.7
Rudder High School	0.0	0.7	35.5	24.6	39.2
Sam Houston	0.0	0.9	11.1	14.4	73.6
Sam Rayburn MS	0.6	0.5	25.7	26.8	46.2
SFA MS	0.1	0.8	16.9	55.8	26.4
SOS	0.0	0.0	50.7	34.8	14.5
Sul Ross	0.0	0.8	25.5	26.8	46.9
District Total	0.1	0.5	25.0	46.5	27.9

Source: Bryan Independent School District

BISD Student to Teacher Ratio

Grade Level	Ratio
Elementary (K-4):	22 to 1
Elementary (5):	25 to 1
Middle School:	13 to 1
High School:	13 to 1

Source: Bryan Independent School District

BISD Staff Statistics

More than 21% of the 1,015 teachers in the district hold advanced degrees. Professional staff members in Bryan ISD have an average of 11 years of experience, 7 of them in Bryan schools.

BISD Employee Classification

Classification	Number of Employees
Teachers	1,341
Professional Support	1,055
Campus Administration	46
Central Administration	19

Educational Aides	191
Auxiliary Staff	636

Source: Bryan Independent School District

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

Blinn College – Bryan, Texas Campus

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

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

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

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

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

Transportation Networks

Air Service

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

Freight Carriers

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

Rail Service Provider:

Union Pacific

Highway / Public Transit

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

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

Fair Housing Complaint Profile

- **Fair Housing Complaints:** There have been few fair housing complaints in the City of Bryan. During the 2005-2009 period, there have been 19 discrimination complaints made by 10 complainants to HUD. All complaints related to discrimination in rental. More than half of these were related to discrimination based upon rental terms, conditions, or facilities. The primary basis for discrimination complaints was disability (28%), followed by family status and race (20% each). All cases were found to be without cause, withdrawn, or dismissed.
- **Documentation of Fair Housing Complaints:** The following table illustrates the fair housing complaints within the jurisdictional boundaries of the City of Bryan.

Fair Housing Complaint Profile Table

Agency	Case	Date Opened	Date Closed	Result	Issue No.	Issue Description	Basis	Basis 2	Basis 3
HUD	60508998	6/6/2005	1/12/2006	No Cause	320	Discriminatory advertising, statements, and notices	Family Status		
HUD	60508998	6/6/2005	1/12/2006	No Cause	312	Discriminatory refusal to rent and negotiate for rental	Family Status		
HUD	60508998	6/6/2005	1/12/2006	No Cause	332	False denial or representation of availability - rental	Family Status		
HUD	60508998	6/6/2005	1/12/2006	No Cause	382	Discrimination in terms/conditions/privileges relating to rental	Family Status		
HUD	60511558	8/10/2005	1/4/2006	No Cause	410	Steering	National Origin	Disability	
HUD	60511558	8/10/2005	1/4/2006	No Cause	312	Discriminatory refusal to rent and negotiate for rental	National Origin	Disability	
HUD	60513588	9/26/2005	6/6/2006	Withdrawn - Resolved	310	Discriminatory refusal to rent	Race		
HUD	60513588	9/26/2005	6/6/2006	Withdrawn - Resolved	382	Discrimination in terms/conditions/privileges relating to rental	Race		
HUD	60602858	12/22/2005	3/29/2006	No Cause	382	Discrimination in terms/conditions/privileges relating to rental	Sex		
HUD	60604498	2/9/2006	5/12/2006	Withdrawn - Resolved	510	Failure to make reasonable accommodation	Disability		
HUD	60604498	2/9/2006	5/12/2006	Withdrawn - Resolved	382	Discrimination in terms/conditions/privileges relating to rental	Disability		
HUD	60612818	9/8/2006	5/15/2007	Dismissed - Lack of Jurisdiction	380	Discriminatory terms, conditions, privileges, or services and facilities	Sex	Harassment	

HUD	60612818	9/8/2006	5/15/2007	Dismissed - Lack of Jurisdiction	382	Discrimination in terms/conditions/privileges relating to rental	Sex	Harassment	
HUD	60706328	3/30/2007	6/27/2007	Dismissed - Complainant uncooperative	380	Discriminatory terms, conditions, privileges, or services and facilities	Disability	Family Status	Religion
HUD	60906408	3/27/2009	6/26/2009	Dismissed - Complainant cannot be found	310	Discriminatory refusal to rent	Race		
HUD	60906408	3/27/2009	6/26/2009	Dismissed - Complainant cannot be found	380	Discriminatory terms, conditions, privileges, or services and facilities	Race		
HUD	60910498	7/15/2009	10/30/2009	Withdrawn - Unresolved	380	Discriminatory terms, conditions, privileges, or services and facilities	Disability		
HUD	60910498	7/15/2009	10/30/2009	Withdrawn - Unresolved	450	Discriminatory acts under Section 818 (coercion, etc.)	Disability		
HUD	60910528	7/15/2009	11/7/2009	Dismissed - Complainant uncooperative	380	Discriminatory terms, conditions, privileges, or services and facilities	Race		

- **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. One complaint the Texas Workforce Commission Civil Rights Division which was initiated in 2003 was settled Dec. 8, 2008. The Austin Tenants' Council, Texas Workforce Commission Civil Rights Division and two female former tenants, agreed to settle a fair housing discrimination lawsuit filed against Henry Carter of Bryan.

Under the Consent Decree and Court Order signed on December 8, 2008, by 85th District Court Judge J.D. Langley, Henry Carter and Urban Quest Properties was required to pay \$275,000 to the plaintiffs; Carter was permanently prohibited from managing rental property; and any of his sons who manage rental property were required to attend fair housing training. The defendants did not admit to the allegations asserted in the lawsuit, and the lawsuit was dismissed.

- **Comparison to Cities of Similar Size/Demographics:** Utilizing the analysis of impediments available on the internet for the cities of Amarillo, it was concluded that similar numbers and types of complaints were received for the time periods data was available.
- **Comparison to National Standards (HDS 1989 & HMPS 1979):** These were standards developed from audit studies of Real Estate sales agents and offices which found differing treatment given to racial minorities. There have been no studies of this type done in the City of Bryan. Comparing the data in the housing complaint profile for the City of Bryan shows only five (5) complaints to be the result of discrimination because of race, and all were found to have no cause, were dismissed or withdrawn.
- **Protected groups reporting complaints:** Of the 19 complaints of record, 10.53% were based upon national origin, 15.79% cited sex, 21.05% cited familial status, 26.32% regarding race, and 26.32% were from the disabled..
- **Complaint issues/allegations:** The predominant issue reported by complainants was failure to rent (100%), of which all have been successfully resolved.
- **Resolution of complaints:** All previous complaints during the 2005-2009 period have been found to have no cause, or were dismissed 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/departments/?name=fair_housing_and_discrimination
 - Participation in the annual Fair Housing Symposium Luncheon for fair housing advocates sponsored by the Brazos Valley Council of Governments
 - Participates in the Homebuyer Education Coalition, sponsored by the Texas Cooperative Extension Service, which educates homebuyers about the home buying process, including fair housing
- **Private Fair Housing Group:** Project Unity, a local nonprofit public service organization, has coordinated fair housing seminars in the past.
- **Local Association of Realtors/Apartment Association:** Both of these organizations conduct regular fair housing training for their members.
- **Evaluation of Fair Housing Education Programs:** It is likely that public awareness brought about by the City's fair housing CDBG-funded activities has resulted in a consistent number of reported complaints, therefore the strategy of public outreach has been successful.

Fair Housing Enforcement and Monitoring Provisions

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

- **State Department of Insurance:** The Texas State Department of insurance monitors policies and procedures of Texas Insurers.

Evaluation of Fair Housing Enforcement and Monitoring Provisions: For the 2005-2009 period, there have been no fair housing complaints made to the City, 19 complaints made to HUD, and no complaints made to the State of Texas regarding discrimination in the City of Bryan. All complaints have been successfully resolved.

Population Profiles

Bryan – College Station, TX Metropolitan Statistical Area (MSA)

ACS Demographic and Housing Estimates: 2006-2008

Data Set: 2006-2008 American Community Survey 3-Year Estimates

Survey: American Community Survey

ACS Demographic and Housing Estimates	Estimate	Margin of Error	Percent	Margin of Error
SEX AND AGE				
Total population	203,557	*****	203,557	(X)
Male	103,472	+/-347	50.8%	+/-0.2
Female	100,085	+/-347	49.2%	+/-0.2
Under 5 years	14,491	+/-135	7.1%	+/-0.1
5 to 9 years	11,271	+/-711	5.5%	+/-0.3
10 to 14 years	12,290	+/-707	6.0%	+/-0.3
15 to 19 years	22,512	+/-376	11.1%	+/-0.2
20 to 24 years	37,926	+/-412	18.6%	+/-0.2
25 to 34 years	29,392	+/-434	14.4%	+/-0.2
35 to 44 years	23,138	+/-455	11.4%	+/-0.2
45 to 54 years	20,061	+/-328	9.9%	+/-0.2
55 to 59 years	8,139	+/-559	4.0%	+/-0.3
60 to 64 years	6,510	+/-536	3.2%	+/-0.3
65 to 74 years	9,574	+/-277	4.7%	+/-0.1
75 to 84 years	6,055	+/-445	3.0%	+/-0.2
85 years and over	2,198	+/-337	1.1%	+/-0.2
Median age (years)	25.9	+/-0.2	(X)	(X)
18 years and over	157,949	+/-81	77.6%	+/-0.1
21 years and over	133,216	+/-1,461	65.4%	+/-0.7
62 years and over	21,514	+/-520	10.6%	+/-0.3
65 years and over	17,827	+/-217	8.8%	+/-0.1
18 years and over	157,949	+/-81	157,949	(X)
Male	79,339	+/-139	50.2%	+/-0.1
Female	78,610	+/-124	49.8%	+/-0.1
65 years and over	17,827	+/-217	17,827	(X)
Male	7,438	+/-114	41.7%	+/-0.5
Female	10,389	+/-174	58.3%	+/-0.5
RACE				
Total population	203,557	*****	203,557	(X)
One race	198,632	+/-1,051	97.6%	+/-0.5
Two or more races	4,925	+/-1,051	2.4%	+/-0.5
One race	198,632	+/-1,051	97.6%	+/-0.5
White	152,671	+/-2,003	75.0%	+/-1.0

Black or African American	23,001	+/-618	11.3%	+/-0.3
American Indian and Alaska Native	446	+/-161	0.2%	+/-0.1
Cherokee tribal grouping	N	N	N	N
Chippewa tribal grouping	N	N	N	N
Navajo tribal grouping	N	N	N	N
Sioux tribal grouping	N	N	N	N
Asian	8,090	+/-303	4.0%	+/-0.1
Asian Indian	1,697	+/-442	0.8%	+/-0.2
Chinese	2,068	+/-531	1.0%	+/-0.3
Filipino	608	+/-376	0.3%	+/-0.2
Japanese	86	+/-74	0.0%	+/-0.1
Korean	1,996	+/-579	1.0%	+/-0.3
Vietnamese	762	+/-418	0.4%	+/-0.2
Other Asian	873	+/-321	0.4%	+/-0.2
Native Hawaiian and Other Pacific Islander	260	+/-177	0.1%	+/-0.1
Native Hawaiian	N	N	N	N
Guamanian or Chamorro	N	N	N	N
Samoa	N	N	N	N
Other Pacific Islander	N	N	N	N
Some other race	14,164	+/-1,910	7.0%	+/-0.9
Two or more races	4,925	+/-1,051	2.4%	+/-0.5
White and Black or African American	945	+/-526	0.5%	+/-0.3
White and American Indian and Alaska Native	1,355	+/-418	0.7%	+/-0.2
White and Asian	282	+/-160	0.1%	+/-0.1
Black or African American and American Indian and Alaska Native	223	+/-180	0.1%	+/-0.1
Race alone or in combination with one or more other races				
Total population	203,557	****	203,557	(X)
White	156,784	+/-2,002	77.0%	+/-1.0
Black or African American	24,876	+/-644	12.2%	+/-0.3
American Indian and Alaska Native	2,239	+/-512	1.1%	+/-0.3
Asian	8,553	+/-320	4.2%	+/-0.2
Native Hawaiian and Other Pacific Islander	328	+/-179	0.2%	+/-0.1
Some other race	16,006	+/-2,050	7.9%	+/-1.0
HISPANIC OR LATINO AND RACE				
Total population	203,557	****	203,557	(X)
Hispanic or Latino (of any race)	40,792	****	20.0%	****
Mexican	34,439	+/-1,322	16.9%	+/-0.6
Puerto Rican	398	+/-234	0.2%	+/-0.1
Cuban	195	+/-128	0.1%	+/-0.1
Other Hispanic or Latino	5,760	+/-1,271	2.8%	+/-0.6
Not Hispanic or Latino	162,765	****	80.0%	****
White alone	128,729	+/-160	63.2%	+/-0.1
Black or African American alone	22,624	+/-572	11.1%	+/-0.3
American Indian and Alaska Native alone	367	+/-161	0.2%	+/-0.1
Asian alone	8,071	+/-303	4.0%	+/-0.1
Native Hawaiian and Other Pacific Islander alone	237	+/-171	0.1%	+/-0.1
Some other race alone	332	+/-227	0.2%	+/-0.1
Two or more races	2,405	+/-499	1.2%	+/-0.2
Two races including Some other race	61	+/-73	0.0%	+/-0.1
Two races excluding Some other race, and Three or more races	2,344	+/-482	1.2%	+/-0.2

Source: U.S. Census Bureau, 2006-2008 American Community Survey

Appendix – A City of Bryan Fair Housing Ordinance

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

FAIR HOUSING

Sec. 58-40. Declaration of policy.

(a) It is hereby declared to be the policy of the city to bring about, through fair, orderly and lawful procedures, the opportunity for each person to obtain housing without regard to his or her race, color, religion, sex, familial status or national origin.

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

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

(1) Pregnant;

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

a. Is the parent or legal custodian; or

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

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

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

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

Sec. 58-41. Definitions.

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

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

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

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

Family shall include a single individual.

Person shall mean:

(1) An individual;

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

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

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

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

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

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

- (1) To refuse the sale or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status or national origin.
 - (2) To discriminate against any person in the terms, conditions or privileges of sale or rental of a dwelling, or in the provisions of services or facilities in connection therewith, because of race, color, religion, sex, familial status or national origin.
 - (3) To make, print or publish or cause to be made, printed or published any notice, statement or advertisement, with respect to the sale or rental of a dwelling unit that indicates any preference, limitation or discrimination based on race, color, religion, sex, disability, familial status or national origin, or any intention to make any such preference, limitation or discrimination.
 - (4) To represent to any person because of race, color, religion, sex, disability, familial status or national origin that any dwelling is not available for inspection, sale or rental when such dwelling is in fact so available.
 - (5) For profit, or with the hope of expectation of profit, to induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, sex, disability, familial status or national origin.
 - (6) To discriminate in any other manner prohibited by V.T.C.A., Property Code ch. 301, including, but not limited to V.T.C.A., Property Code § 301.025, pertaining to discrimination because of disability.
- (Code 1975, § 9-3; Code 1988, § 13-48)

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

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

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

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

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

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

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

Sec. 58-45. Exemptions and exclusions.

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

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

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

a. Without the use in any manner of the sales or rental facilities or the sales or rental services of any real estate broker, agent or salesperson, or of such facilities or services of any person in the business of selling or renting dwellings, or of any employee or agent of any such broker, agent, salesperson or person; and

b. Without the publication, posting or mailing of any advertisement or written notice in violation of section 58-42(3);

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

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

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

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

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

Sec. 58-46. Complaints.

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

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

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

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

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

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

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

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

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

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

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

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

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

Sec. 58-48. Unlawful intimidation.

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

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

Sec. 58-49. Penalties.

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

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

Appendix – B FFIEC HMDA List of Financial Institutions

LIST OF FINANCIAL INSTITUTIONS WHOSE DATA MAKE UP THE 2007 MSAMD AGGREGATE REPORT

Page 1 of 3

INSTITUTIONS WHO HAVE A HOME OR BRANCH OFFICE IN THE MSAMD

MSAMD-17780 - COLLEGE STATION-BRYAN, TX

AAA WORLDWIDE FINANCIAL CO	ABN AMRO MTO GROUP INC	ACCREDITED HOME LENDERS, INC
ADVANCED FINANCIAL SERVICES IN	ALETHES, LLC	AM MTG NETWORK DBA VERTI
AMC MORTGAGE SERVICES, INC.	AMEY MORTGAGE COMPANY, L.L.C.	AMERIQUEST MORTGAGE COMPANY
ARGENT MORTGAGE COMPANY	ASPIRE FINANCIAL INC	BANK OF AMERICA, N.A.
BAYROCK MORTGAGE CORPORATION	BEAR STEARNS RESIDENTIAL MORTG	BENEFICIAL COMPANY, LLC
BRAZOS VALLEY BANK, NA	BRAZOS VALLEY SCHOOLS CREDIT U	BRENNHAM NATIONAL BANK
CASA BLANCA MORTGAGE, INC.	CERTIFIED FUNDING, LP	CITIBANK, N.A.
CITIFINANCIAL, INC.	CITIMORTGAGE, INC	CITIZENS MORTGAGE CORP
CITIZENS STATE BANK	CITY BANK	COMPASS BANK
CORNERSTONE MORTGAGE COMPANY	COUNTRYPLACE MORTGAGE, LTD.	COUNTRYWIDE HOME LOANS
CTX MORTGAGE COMPANY, LLC	CU FACTORY BUILT LENDING, LP	DECISION ONE MORTGAGE
DELTA FUNDING CORPORATION	DHI MORTGAGE COMPANY LIMITED	E-LOAN INC
EQUIFIRST CORPORATION	EXTRACO MORTGAGE	First Bank of Stock
First Franklin Corporation	FIELDSTONE MORTGAGE COMPANY	FIRST HOUSTON MORTGAGE
FIRST NATIONAL BANK TEXAS	FIRST NLC FINANCIAL SERVICES	FIRST STAR BANK, SSB
FIRST VICTORIA NATIONAL BANK	FRANKLIN AMERICAN MORTGAGE CO	FRANKLIN BANK, SSB
FREEDOM MORTGAGE CORP	GNAC MORTGAGE LLC	GREAT WESTERN FINANCIAL
GREATER TEXAS FEDERAL CREDIT U	GREENPOINT MORTGAGE FUNDING	GUARANTY BANK
H&R BLOCK MORTGAGE CORPORATION	HFC COMPANY, LLC	HOMECONINGS FINANCIAL LLC
HOMETRUST MORTGAGE COMPANY	HSBC MORTGAGE SERVICES, INC.	MORTGAGE.COM, INC.
INTERNATIONAL BANK OF COMMERCE	JPMORGAN CHASE BANK	LUBBOCK NATIONAL BANK
MERRILL LYNCH CREDIT CORP	MERRILL LYNCH MORTGAGE LENDING	MIDSOUTH BANK
MORGAN STANLEY CREDIT CORPORAT	MORTGAGE NETWORK INC	MORTGAGETT
NATIONSTAR MORTGAGE LLC	NATIONWIDE ADVANTAGE MORTGAGE	NETWORK FUNDING, LP
NOVASTAR MORTGAGE, INC.	NTRY INC	OPTION ONE MORTGAGE CORP
ORIGEN FINANCIAL	PHH HOME LOANS	PHH MORTGAGE CORPORATION
PLAZA HOME MORTGAGE INC.	PRIME LENDING	PROSPERITY BANK
PROVIDENT FUNDING ASSOCIATES	QUICKEN LOANS	REALTY MORTGAGE
RESIDENTIAL FUNDING CORP, LLC	RESUME MORTGAGE CORPORATION	REUNION MORTGAGE, INC
RMC VANGUARD MORTGAGE CORP	SAXON MORTGAGE	SECURITYNATIONAL MORTGAGE
SIERRA PACIFIC MORTGAGE	SOUTHWEST STAGE FUNDING	STATE BANK
SUNTRUST MORTGAGE, INC.	TAYLOR, BEAN & WHITAKER	THE CIT GROUP/CONSUMER FINANCE
THE MORTGAGE OUTLET, INC.	TMG REAL ESTATE AND FINANCIAL	VANDERBILT MORTGAGE
Western Mortgage Corporation	WACHOVIA MORTGAGE	WELLS FARGO BANK, NA
WELLS FARGO FINL TEXAS, INC	WELLS FARGO FUNDING, INC	1ST ADVANTAGE MORTGAGE, LLC
Z1ST MORTGAGE CORPORATION		

Report Date: 05/22/2008

INSTITUTIONS WHO DO NOT HAVE A HOME OR BRANCH OFFICE IN THE MSAMID

MSAMID-17789 - COLLEGE STATION-BRYAN, TX

A+ FEDERAL CREDIT UNION	AFCU	ACADEMY MORTGAGE CORP
AGSTAR FINANCIAL SERVICES, ACA	AIR FORCE FEDERAL CREDIT UNION	ALLEN MORTGAGE, LLC
ALLIED HOME MORTGAGE CAPITAL C	AMARILLO NATIONAL BANK	AMERICAN BANK
AMERICAN FINANCE HOUSE LARIBA	AMERICAN FIRST NATIONAL BANK	AMERICAN INTERNET MORTGAGE
AMERICAN NATIONAL BANK OF TX	AMERICAN SOUTHWEST MORTGAGE CO	AMERICAN STATE BANK
AMERICAN STERLING BANK	AMERISAVE MORTGAGE CORPORATION	AMPLIFY FOU FINA/BM TEXAS
AMTRUST BANK	ARK-LA-TEX FINANCIAL	ARVEST MORTGAGE COMPANY
ATLANTA POSTAL CREDIT UNION	BANK OF HOUSTON	BANCORPSOUTH BANK
BANK OF COMMERCE	BANK OF HOUSTON	BANK OF OKLAHOMA, NA
BANK OF TEXAS	BANK OF TEXAS, NA	BANKERSWEST FUNDING CORPORATIO
BEACON FEDERAL CREDIT UNION	BELVEDERE NETWORKING ENTERPRIS	BENCHMARK BANK
BIRMINGHAM BANCORP MORTGAGE	BRIDGE CITY STATE BANK	BUCKHOLTS STATE BANK
Community Resource Credit Union	CAPITAL ONE HOME LOANS, LLC	CAPITAL ONE NA
BIRMINGHAM BANCORP MORTGAGE	CENTRAL NATIONAL BANK	CHAMPION BANK
CENTENNIAL MORTGAGE & FUNDING	CHARTER BANK	CHASE MANHATTAN BANK USA, NA
CHARLES SCHWAB BANK	CHEVRON FEDERAL CREDIT UNION	CITICORP TRUST BANK, FSB
CHERRY CREEK MORTGAGE CO, INC	CLASSIC HOME FINANCIAL	COLONIAL BANK, N.A.
CITY NATIONAL BANK OF TAYLOR	COMERICA BANK	COMMUNICATION FEDERAL CU
COLONIAL SAVINGS, F.A.	COMMUNITY FINANCIAL SERVICES	COUNTRYWIDE BANK, FSB
COMMUNITY BANK & TRUST	CREDIT UNION OF TEXAS	CROSCENT MORTGAGE COMPANY
COUNTRYWIDE REAL ESTATE FIN	DALLAS TELCO FCU	DB HOME LENDING LLC
CWCAPITAL LLC	DOMESTIC BANK	DRAPER AND KRAMER MORTGAGE COR
DIGITAL FEDERAL CREDIT UNION	EAGLE NATIONAL BANK - ARTS DIV	EASTMAN CREDIT UNION
ETRADE BANK	ENGORE BANK NATIONAL ASSOCIAT	ENTERPRISE BANK
EDUCATIONAL SYSTEMS FCU	ESB MORTGAGE COMPANY	ENTERPRISE BANK
EQUITY ONE, INC.	EVERHOME MORTGAGE COMPANY	EVERBANK
EVERETT FINANCIAL INC.	FIFTH THIRD MORTGAGE COMPANY	EXTRACIO BANKS
FIDELITY BANK OF TEXAS	FIRST COMMUNITY CREDIT UNION	FIRST BANK & TRUST EAST TEXAS
FIRST COMMUNITY BANK	FIRST CREDIT UNION	FIRST CONSOLIDATED MORTGAGE
FIRST CONTINENTAL MORTGAGE LTD	FIRST GUARANTY BANK	FIRST FEDERAL BANK TEXAS
FIRST FINANCIAL BANK N.A.	FIRST NATIONAL BANK	FIRST GUARANTY MORTGAGE COPR
FIRST MORTGAGE COMPANY LLC	FIRST NATIONAL BANK OF MIDLAND	FIRST NATIONAL BANK & TRUST CO
FIRST NATIONAL BANK OF ARIZONA	FIRST STATE BANK	FIRST NATIONAL BANK OF TRENTON
FIRST OPTION MORTGAGE, LLC	FIRSTBANK SOUTHWEST	FIRST STATE BANK CENTRAL TEXAS
FIRST TENNESSEE BANK NA	FORT HOOD NATIONAL BANK	FIRSTMARK CREDIT UNION
FLAGSTAR BANK	GARDNER FINANCIAL SERVICES, LT	FREMONT INVESTMENT & LOAN
FLORIDA NATIONAL BANK	GLOBAL EQUITY LENDING, INC.	GATEWAY BANK, FSB
GE MONEY BANK	GREEN TREE SERVINGING LLC	GMAC BANK
GRANITE MORTGAGE CORP.	HAPPY STATE BANK	GREENLIGHT FINANCIAL SERVICES
GUARANTY BOND BANK	HOME LOAN CENTER, INC.	HERRING BANK
HOME FEDERAL SAVINGS AND LOAN	HOUSTON TX FIRE FIGHTERS FCU	HOME LOAN CORPORATION
HOME LOAN INVESTMENT BANK	HSEC MORTGAGE CORP	HOMEOWNERS MORTGAGE ENT.
HSEC CREDIT CENTER INC	IMPERIAL LENDING, LLC	HSEC BANK USA, NA
IMPERIAL CAPITAL BANK	KEYBANK NATIONAL ASSOCIATION	IDEAL MORTGAGE BANKERS, LTD
ING BANK, FSB		INDYMAC BANK, F.S.B.
JSC FEDERAL CREDIT UNION		JEFF DAVIS BANK & TRUST CO.
		LAKE FOREST BANK & TRUST CO

LIST OF FINANCIAL INSTITUTIONS WHOSE DATA MAKE UP THE 2007 MSAMD AGGREGATE REPORT

INSTITUTIONS WHO DO NOT HAVE A HOME OR BRANCH OFFICE IN THE MSAMD MSAMD: 17790 - COLLEGE STATION-ARYAN, TX

- LASALLE BANK NA
- LENDING.COM
- LRS FINANCIAL NETWORK, INC.
- MIDFIRST BANK
- MORTGAGE LENDERS OF AMERICA
- NEVEREST NATIONAL BANK
- NORTH DALLAS BANK & TRUST CO.
- ORANGE SAVINGS BANK
- PENTAGON FEDERAL CREDIT UNION
- PINNACLE FINANCIAL CORPORATION
- POST OAK BANK N.A.
- PRIMARY RESIDENTIAL MORTGAGE PRIORITY BANK
- QUALTRUST CREDIT UNION
- RBS CITIZENS BANK, N.A.
- RESIDENTIAL FINANCE CORP
- SAN DIEGO NATIONAL BANK
- SECURITY SERVICE FCU
- SPRING HILL STATE BANK
- STATE NATIONAL BANK
- SUNTRUST BANKS, INC.
- TEXAS BANK AND TRUST COMPANY
- TEXAS STATE BANK
- THE BANK OF RIVER OAKS
- THE MORTGAGE STORE FINANCIAL TRAVELER CREDIT UNION
- UNITED TEXAS BANK
- UNIVERSAL MORTGAGE CORPORATION
- US BANK, N.A.
- VELOCITY COMMERCIAL CAPITAL
- VELOCITY CREDIT UNION
- VINTAGE BANK
- WASHINGTON MUTUAL BANK
- WELLS FARGO FINL GEORGIA, INC
- WMC MORTGAGE CORP.
- WVR STARKEY MORTGAGE, LLP
- LEGEND BANK N.A.
- LIBERTY BANK F.S.B.
- MARKET STREET MORTGAGE CORP
- MID MORTGAGE, INC.
- National City Bank
- NFCU
- NORTHERN TRUST NA
- PARK NATIONAL BANK
- PEOPLES TRUST FCU
- PIONEER MORTGAGE COMPANY
- PRADO MORTGAGE, INC
- PRIMEWEST MORTGAGE CORP
- PULASKI MORTGAGE COMPANY
- Rocky Mountain Mortgage Compan
- REGIONS BANK
- SALLIE MAE HOME LOANS
- SECU
- SERVICE FIRST MORTGAGE
- STANFORD FEDERAL CREDIT UNION
- STARBUCKS LENDING, INC.
- TDECU
- TEXAS BAY AREA CREDIT UNION
- TEXSTAR BANK/FNB MONAHAN
- THE CIT GROUP/SALES FINANCING
- THE NATIONAL BANK OF GEORGIA
- US AG TAMPA BRANCH
- UNITED BILT HOMES, INC.
- UNIVERSITY FEDERAL CREDIT UNIO
- USAA FEDERAL SAVINGS BANK
- VELOCITY CREDIT UNION
- Walter Mortgage Company
- WEBSTER BANK, N.A.
- WESTAMERICA MORTGAGE COMPANY
- WOODFOREST NATIONAL BANK
- 66 FEDERAL CREDIT UNION
- LEHMAN BROTHERS BANK, FSB
- LIBERTY FINANCIAL GROUP, INC.
- MBI MORTGAGE INC
- MORTGAGE CAPITAL ASSOCIATES,
- NATIONWIDE MORTGAGE CONCEPTS
- NORTH AMERICAN SAVINGS BANK
- OMNIAMERICAN BANK
- PATRIOT BANK MORTGAGE
- PERFORMANCE CREDIT CORPORATION
- PLATINUM COMMUNITY BANK
- PRIMARY CAPITAL ADVISORS LC
- PRINCIPAL BANK
- PURDUE EMPLOYEES FEDERAL CU
- RANDOLPHBROOKS FCU
- REPUBLIC MORTGAGE HOME LOANS,
- SAN ANGELO NATIONAL BANK
- SECURITY BANK
- SOUTHSIDE BANK
- STATE FARM BANK
- STERLING BANK
- TEXAS CREDIT UNION
- TEXAS NATIONAL BANK
- THE BANK AND TRUST, S.S.B.
- THE LENDING PARTNERS LTD.
- TRIAN LLC DBA AFRI
- UNION BANK OF CALIFORNIA, N.A.
- UNITY ONE FEDERAL CREDIT UNION
- US BANK NORTH DAKOTA
- VALLEY MORTGAGE/TSB MORTGAGE
- VIEWPOINT BANK
- WACHOVIA BANK NA
- WEICHERT FINANCIAL SERVICES
- WILMINGTON FINANCE, INC.
- WORLD SAVINGS BANK, FSB

Appendix – C FFIEC HMDA Disposition of Loan Data

AGGREGATE TABLE 4-1: DISPOSITION OF APPLICATIONS FOR FHA, FSARHS, AND VA HOME-PURCHASE LOANS, 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2007

MSAMD: 17790 - COLLEGE STATION-BRYAN, TX

Race and Gender 5/ 16/ 19/	Applications Received 20		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)												
MALE												
JOINT (MALE/FEMALE)	3	482	2	289					1	153		
FEMALE	1	161	1	161								
JOINT (MALE/FEMALE)	1	153	1	138						1	153	
BLACK OR AFRICAN AMERICAN (TOTAL)												
MALE	59	6980	38	4698	4	430	9	809	7	909	1	144
JOINT (MALE/FEMALE)	17	1982	12	1418	1	31	2	99	2	291	1	144
FEMALE	22	2389	15	1796	1	31	4	375	2	197		
JOINT (MALE/FEMALE)	20	2629	11	1474	3	399	3	335	3	421		
NAT HAWAIIAN/OTHER PACIFIC ISL (TOTAL)												
MALE	4	461	4	461								
JOINT (MALE/FEMALE)	2	217	2	217								
FEMALE	1	128	1	128								
JOINT (MALE/FEMALE)	1	116	1	116								
WHITE (TOTAL)												
MALE	438	55072	357	45496	8	671	30	3563	40	5045	3	307
JOINT (MALE/FEMALE)	140	17296	107	13542	2	177	13	1448	18	2129	1	178
FEMALE	89	10220	69	7771	2	67	6	697	11	1507	1	178
JOINT (MALE/FEMALE)	207	27318	179	23935	4	427	11	1418	11	1409	2	129
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
JOINT (MALE/FEMALE)	6	765	5	617					1	148		
FEMALE												
JOINT (WHITE/MINORITY RACE) (TOTAL)	6	765	5	617					1	148		
RACE NOT AVAILABLE (TOTAL) 6/												
MALE	34	4267	19	2656			12	1236	2	285	1	100
JOINT (MALE/FEMALE)	9	1179	5	748			3	307	1	124		
FEMALE	1	69	1	69								
JOINT (MALE/FEMALE)	9	1110	7	989			1	21	1	100		

AGGREGATE TABLE 4-1: DISPOSITION OF APPLICATIONS FOR FHA, FSARRS, AND VA HOME-PURCHASE LOANS, 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2007

MSAAMD-17780 - COLLEGE STATION-BRYAN, TX

Ethnicity, Gender and Income 7/18/19'	Applications Received 20'		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	73	7228	58	5940	3	133	9	812	3	343		
MALE	27	2829	20	2114			5	487	2	218		
FEMALE	19	1837	16	1719	2	67	1	51				
JOINT (MALE/FEMALE)	27	2822	22	2107	1	86	3	294	1	125		
NOT HISPANIC OR LATINO (TOTAL)	424	54718	338	44235	9	988	31	3924	42	5440	4	451
MALE	129	16232	99	12803	2	177	11	1114	16	1994	1	144
FEMALE	92	10816	88	7862	1	31	9	1021	13	1724	1	178
JOINT (MALE/FEMALE)	200	27360	168	22260	6	750	11	1489	13	1722	2	129
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO) (TOTAL)	10	1263	9	1199					1	64		
MALE	1	64							1	64		
FEMALE												
JOINT (MALE/FEMALE)	9	1199	9	1199								
ETHNICITY NOT AVAILABLE (TOTAL) 6/	37	4778	20	2833			11	1172	5	673	1	100
MALE	12	1680	8	1169			2	243	2	268		
FEMALE	3	316	2	183			1	133	1	133		
JOINT (MALE/FEMALE)	8	955	5	703			1	21	1	131	1	100
MINORITY STATUS 8/18/19'												
WHITE NON-HISPANIC (TOTAL)	356	46822	291	38455	5	538	22	2815	35	4507	3	307
MALE	113	14410	87	11371	2	177	9	1015	15	1847		
FEMALE	69	8289	52	5938			5	646	11	1507	1	178
JOINT (MALE/FEMALE)	172	23705	150	20908	3	361	8	1154	9	1153	2	129
OTHERS (INCLUDING HISPANIC (TOTAL)	151	16678	112	12733	7	563	18	1621	13	1617	1	144
MALE	46	5006	33	3683			7	586	5	573		
FEMALE	43	4517	32	3643	3	98	5	426	3	350		
JOINT (MALE/FEMALE)	62	7155	47	5397	4	485	6	599	5	694		
INCOME OF APPLICANTS 8/												
LESS THAN 50% OF MSAAMD MEDIAN	30	2036	21	1578	3	123	6	335				
50-73% OF MSAAMD MEDIAN	96	9165	69	6679	4	242	12	1047	9	953	2	244
80-98% OF MSAAMD MEDIAN	87	10111	68	7729			6	724	13	1658		
100-119% OF MSAAMD MEDIAN	84	10850	69	8921			10	1265	5	684		
120% OR MORE OF MSAAMD MEDIAN	240	34973	195	28988	5	736	16	2084	21	2848	3	307
INCOME NOT AVAILABLE 6/	7	852	3	302			1	153	3	387		
TOTAL 14/	544	67987	425	54207	12	1101	51	5608	51	6520	5	551

AGGREGATE TABLE 4-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2007

MSAAMD, 17780 - COLLEGE STATION-BRYAN, TX

Race and Gender 5/18/19/	Applications Received 2/0/		Loans Originated		Apts. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	15	1648	4	490	5	561	3	377	3	220		
MALE	5	862	2	258	1	290	2	314				
FEMALE	8	590	1	98	3	211	1	63	3	220		
JOINT (MALE/FEMALE)	2	206	1	136	1	70						
ASIAN (TOTAL)	176	21698	141	17273	9	1571	11	1269	7	807	7	738
MALE	64	6810	52	5275	2	247	5	699	1	165	4	424
FEMALE	32	3285	25	2741	1	200	1	89	3	155	2	90
JOINT (MALE/FEMALE)	79	11563	64	9257	6	1124	5	471	3	487	1	224
BLACK OR AFRICAN AMERICAN (TOTAL)	225	21475	104	11209	23	1599	70	6091	19	1815	9	761
MALE	74	7738	36	4212	8	618	22	2199	3	310	5	405
FEMALE	83	6785	42	3751	3	187	27	1916	9	826	2	185
JOINT (MALE/FEMALE)	67	6959	26	3246	12	794	21	2082	6	666	2	171
NAT HAWAIIAN/OTHER PACIFIC ISL (TOTAL)	18	2282	15	1970	1	311	1	55	1	26		
MALE	11	1335	9	1254								
FEMALE	7	927	6	616	1	311			1	26		
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	3822	438812	2838	332831	276	31305	424	38274	201	23995	83	10407
MALE	1323	141182	907	100246	86	7942	204	17291	86	9837	40	5666
FEMALE	598	57278	436	44102	56	4927	72	5071	21	1797	13	1381
JOINT (MALE/FEMALE)	1898	238052	1495	188483	134	19436	148	15588	94	12261	29	3294
2 OR MORE MINORITY RACES (TOTAL)	5	409	5	409								
MALE	2	163	2	163								
FEMALE	2	144	2	144								
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	55	7796	35	5181	7	799	9	1208	3	269	1	340
MALE	5	673	2	156	3	515						
FEMALE	49	7093	33	5023	3	254	9	1208	3	268	1	340
JOINT (MALE/FEMALE)												
RACE NOT AVAILABLE (TOTAL) 6/	487	65155	333	48028	31	3094	65	6224	44	5213	14	2886
MALE	74	8358	47	5439	7	481	9	851	8	1307	3	280
FEMALE	40	3597	21	1962	2	128	11	746	2	151	4	610
JOINT (MALE/FEMALE)	83	12927	59	9892	9	1092	9	1093	4	539	2	231

AGGREGATE TABLE 4-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2007

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

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Ethnicity, Gender and Income 7/18/19	Applications Received 20		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	360	34171	214	20837	29	2911	79	7130	28	2618	10	875
MALE	154	14326	86	8686	12	898	37	2584	13	1687	6	581
FEMALE	73	5183	40	3042	8	780	17	926	6	293	2	142
JOINT (MALE/FEMALE)	133	14682	88	9029	9	1233	25	3610	9	638	2	152
NOT HISPANIC OR LATINO (TOTAL)	3688	446224	2879	341136	289	32602	434	39474	198	23969	88	11043
MALE	1335	144232	929	102849	89	8523	198	18145	77	9019	42	5686
FEMALE	651	82891	464	47679	55	4629	89	6499	28	2570	15	1514
JOINT (MALE/FEMALE)	1893	240227	1482	190067	144	19420	145	14606	92	12367	30	3767
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO) (TOTAL)	77	9107	60	7224	5	620	8	864	3	289	1	110
MALE	2	150	1	50					1	100		
FEMALE												
JOINT (MALE/FEMALE)	75	8957	59	7174	5	620	8	864	2	189	1	110
ETHNICITY NOT AVAILABLE (TOTAL) 6/	477	65713	322	48234	29	3107	62	6030	49	5468	15	2814
MALE	67	8403	41	5540	6	682	8	764	8	839	4	498
FEMALE	37	3441	21	1931	2	244	6	370	4	286	4	610
JOINT (MALE/FEMALE)	86	13935	57	10517	8	808	12	1352	7	1027	2	231
MINORITY STATUS 9/18/19												
WHITE NON-HISPANIC (TOTAL)	3410	384685	2584	305905	244	27789	344	31153	186	20594	72	9234
MALE	1179	127160	832	92253	74	6755	169	15070	70	8175	34	4897
FEMALE	530	52147	395	40819	47	4003	61	4613	16	1473	11	1239
JOINT (MALE/FEMALE)	1698	215088	1357	172833	123	17031	112	11246	80	10946	26	3032
OTHERS, INCLUDING HISPANIC (TOTAL)	893	94397	553	61484	77	8124	174	16042	62	5953	27	2794
MALE	303	30637	180	18925	26	2568	64	5486	19	2288	14	1380
FEMALE	190	15601	106	9540	15	1378	44	2782	19	1404	6	417
JOINT (MALE/FEMALE)	397	48114	266	32917	35	4158	66	7794	23	2248	7	997
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MID MEDIAN	249	13884	111	6756	26	1281	87	4163	20	1183	5	291
50-79% OF MSA/MID MEDIAN	492	39177	308	25830	31	2151	105	7386	28	2040	19	1770
80-99% OF MSA/MID MEDIAN	426	38893	286	27944	31	2595	59	4388	27	2687	13	1299
100-119% OF MSA/MID MEDIAN	440	42743	302	29996	44	3482	52	5004	32	3137	10	1174
120% OR MORE OF MSA/MID MEDIAN	3056	401234	2345	308371	216	29253	269	31382	166	22756	60	9492
INCOME NOT AVAILABLE 6/	139	21484	112	18394	4	528	11	1215	5	531	7	816
TOTAL 14/	4802	557215	3475	417291	352	39240	583	53498	278	32344	114	14642

Report Date: 05/22/2008

AGGREGATE TABLE 4-3. DISPOSITION OF APPLICATIONS TO REFINANCE LOANS ON 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2007

MSAMD: 17780 - COLLEGE STATION-BRYAN, TX

Race and Gender 5/18/19	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	15	1062	2	200	2	67	6	368	4	373	1	54
MALE	6	305	1	30			3	192	2	83		
FEMALE	5	455			1	47	1	64	2	290	1	54
JOINT (MALE/FEMALE)	4	302	1	170	1	20	2	112				
ASIAN (TOTAL)	23	3658	12	1716	2	387	7	1002	2	453		
MALE	13	2199	7	1142	1	194	4	532	1	331		
FEMALE	3	360	1	52			2	308				
JOINT (MALE/FEMALE)	7	999	4	522	1	193	1	162	1	122		
BLACK OR AFRICAN AMERICAN (TOTAL)	248	19904	57	4918	20	1450	134	10535	31	2520	6	481
MALE	77	6718	20	1650	10	649	39	3618	7	756	1	45
FEMALE	74	4886	12	791	5	245	46	3114	9	614	2	122
JOINT (MALE/FEMALE)	96	8225	25	2477	5	556	48	3728	15	1150	3	314
NAT HAWAIIAN/OTHER PACIFIC ISL (TOTAL)	5	731	3	596			2	135				
MALE	2	227	2	227			1	60				
FEMALE	1	60					1	75				
JOINT (MALE/FEMALE)	2	444	1	389			1	75				
WHITE (TOTAL)	1893	197370	627	86722	129	14364	505	54306	256	30549	76	11429
MALE	539	67170	189	24569	38	4805	172	18968	102	13532	38	5296
FEMALE	313	32331	109	11399	21	2255	111	10797	96	5829	16	2091
JOINT (MALE/FEMALE)	796	97359	328	50737	69	7112	222	24641	96	10877	21	3892
2 OR MORE MINORITY RACES (TOTAL)	3	280					3	280				
MALE	1	45					1	45				
FEMALE												
JOINT (MALE/FEMALE)	2	215					2	215				
JOINT (WHITE/MINORITY RACE) (TOTAL)	10	1254	2	391			5	490	2	144	1	229
MALE												
FEMALE												
JOINT (MALE/FEMALE)	10	1254	2	391			5	490	2	144	1	229
RACE NOT AVAILABLE (TOTAL) 8/	477	54782	120	15583	28	3787	176	17837	113	12100	40	5475
MALE	86	9181	15	1546	5	884	25	2201	35	3625	6	925
FEMALE	57	5629	14	1432			16	1410	19	1702	8	1085
JOINT (MALE/FEMALE)	114	16070	30	4789	7	1447	41	4889	25	3245	11	1640

AGGREGATE TABLE 4.3: DISPOSITION OF APPLICATIONS TO REFINANCE LOANS ON 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2007

MSAAMD: 17780 - COLLEGE STATION-BRYAN, TX

Ethnicity, Gender and Income 7/18/19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	291	28002	100	9824	20	1648	111	8276	46	4640	14	1614
MALE	116	11577	38	4177	3	311	38	2946	27	3066	9	1077
FEMALE	47	3662	19	1572	17	1337	73	3959	14	980	2	212
JOINT (MALE/FEMALE)	127	10506	41	4018	17	1337	53	3959	14	980	2	212
NOT HISPANIC OR LATINO (TOTAL)	1617	195287	801	82219	130	13883	560	58997	257	29654	69	10634
MALE	531	64668	181	23180	47	5575	186	20449	89	11270	28	4094
FEMALE	386	34608	107	11048	26	2267	145	13212	63	6154	15	1927
JOINT (MALE/FEMALE)	726	96568	313	47391	56	5849	229	25336	103	11819	25	4563
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	22	1995	7	629	2	145	12	1025	1	96		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	22	1995	7	629	2	145	12	1025	1	96		
ETHNICITY NOT AVAILABLE (TOTAL) &/	444	55717	115	17454	29	4359	155	16635	104	11849	41	5420
MALE	77	9700	14	1807	4	746	20	2061	31	3991	8	1095
FEMALE	50	5251	10	1014	1	290	12	1170	18	1687	9	1100
JOINT (MALE/FEMALE)	96	16809	30	6797	8	1897	28	4072	21	2643	9	1400
MINORITY STATUS 8/18/19/												
WHITE NON-HISPANIC (TOTAL)	1301	166789	522	74273	105	11841	406	46110	210	25131	58	9434
MALE	430	54482	151	19897	35	4694	142	16254	76	9784	26	3653
FEMALE	270	28694	93	10119	20	1975	94	9514	51	5235	12	1751
JOINT (MALE/FEMALE)	597	63260	278	44157	49	5180	170	20342	81	9801	19	3780
OTHERS, INCLUDING HISPANIC (TOTAL)	603	59138	179	17545	46	3697	271	21441	85	8077	22	2378
MALE	210	20713	68	7209	14	1154	82	7441	36	4087	10	1122
FEMALE	128	9386	31	2242	6	292	69	4853	16	1488	6	501
JOINT (MALE/FEMALE)	263	22307	79	8037	26	2251	119	9372	33	2492	6	755
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSAAMD MEDIAN	143	9205	23	1246	10	580	83	5360	21	1494	6	525
50-79% OF MSAAMD MEDIAN	346	27446	76	5913	23	1885	146	11427	63	6433	18	1788
80-99% OF MSAAMD MEDIAN	246	21369	58	5203	18	1244	102	8265	54	5367	13	1290
100-119% OF MSAAMD MEDIAN	275	25730	95	8905	21	2074	98	8623	46	4477	15	1771
120% OR MORE OF MSAAMD MEDIAN	1298	188251	537	83949	103	13822	393	49765	195	26904	70	11911
INCOME NOT AVAILABLE 6/	66	8840	33	5010	6	490	16	1493	9	1464	2	383
TOTAL 14/	2374	278901	823	110126	181	20035	838	84833	408	46139	124	17668

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Race and Gender 5/19/19	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)												
MALE	4	170						5	170			
FEMALE		140						4	140			
JOINT (MALE/FEMALE)	1	30					1	30				
ASIAN (TOTAL)												
MALE	8	748	2	216	1	150	4	242	1	140		
FEMALE	3	380			1	150	1	70	1	140		
JOINT (MALE/FEMALE)	2	216	2	216	2	300	5	312	2	280		
BLACK OR AFRICAN AMERICAN (TOTAL)												
MALE	32	681	8	142	2	69	21	430	1	40		
FEMALE	41	1250	6	197	1	33	26	761	6	238	2	21
JOINT (MALE/FEMALE)	37	1341	11	585	3	102	47	1191	7	278	2	15
NAT HAWAIIAN/OTHER PACIFIC ISL. (TOTAL)												
MALE	3	166	1	110				2	56			
FEMALE	3	188	1	110				2	56			
JOINT (MALE/FEMALE)	3	188	1	110				4	112			
WHITE (TOTAL)												
MALE	172	7650	52	2387	19	1486	85	2720	11	714	5	393
FEMALE	110	3946	31	1057	8	440	60	1973	9	445	2	31
JOINT (MALE/FEMALE)	284	16597	130	6494	23	911	145	4693	20	1159	7	424
2 OR MORE MINORITY RACES (TOTAL)												
MALE	1	45						1	45			
FEMALE	1	45						1	45			
JOINT (MALE/FEMALE)	2	90						2	90			
JOINT (WHITEMINORITY RACE) (TOTAL)												
MALE	5	155	2	85	1	20	2	50				
FEMALE												
JOINT (MALE/FEMALE)	5	155	2	85	1	20	2	50				
RACE NOT AVAILABLE (TOTAL) 6/												
MALE	11	434	2	82	2	195	64	2430	9	461	2	65
FEMALE	19	949	5	283	1	88	9	254	3	174		
JOINT (MALE/FEMALE)	20	947	7	431	3	283	73	2584	12	635	2	65

AGGREGATE TABLE 4-4. DISPOSITION OF APPLICATIONS FOR HOME IMPROVEMENT LOANS 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2007

MSAAMD: 17780 - COLLEGE STATION-BRYAN, TX

Ethnicity, Gender and Income 7/18/19'	Applications Received 20'		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	91	3034	23	812	7	353	53	1590	8	279	17	2235
MALE	34	852	6	180	4	109	22	449	2	114	3	393
FEMALE	22	917	2	41	1	131	18	720	1	25	1	1810
JOINT (MALE/FEMALE)	35	1265	15	591	2	113	13	421	5	140	17	2358
NOT HISPANIC OR LATINO (TOTAL)	601	29425	218	10405	46	2586	286	10631	54	3568	17	2235
MALE	184	8161	55	2496	17	1396	96	3096	11	780	5	393
FEMALE	132	4882	35	1213	8	342	71	2412	15	683	3	32
JOINT (MALE/FEMALE)	294	16582	128	6686	21	848	98	5103	28	2105	9	1810
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO) (TOTAL)	19	907	4	186	2	58	11	423	2	240	1	220
MALE	1	20							1	20		
FEMALE	18	887	4	186	2	58	11	423	1	220		
ETHNICITY NOT AVAILABLE (TOTAL) 6/	91	3801	24	1117	2	257	57	2032	5	310	3	85
MALE	8	463	2	45	1	150	4	124	1	144	1	20
FEMALE	18	698	5	283			12	395				
JOINT (MALE/FEMALE)	12	572	5	338			6	156	1	68		
MINORITY STATUS 8/18/19'	473	24926	187	8914	42	2484	192	8555	38	2794	14	2199
WHITE NON-HISPANIC (TOTAL)	147	7036	46	2244	15	1327	72	2472	9	600	5	388
MALE	91	3443	29	1016	7	309	45	1682	9	445	1	11
FEMALE	234	14427	112	5654	20	828	74	4401	20	1749	8	1795
JOINT (MALE/FEMALE)	234	8185	56	2288	14	683	136	3972	25	1206	3	36
OTHERS INCLUDING HISPANIC (TOTAL)	72	2123	15	432	7	328	46	1069	4	294	2	21
MALE	66	2243	8	238	2	164	46	1537	8	283	2	21
FEMALE	98	3819	33	1618	5	191	44	1368	13	629	1	15
JOINT (MALE/FEMALE)												
INCOME OF APPLICANTS 9/	98	2523	16	404	2	40	72	1825	7	244	1	10
LESS THAN 50% OF MSAAMD MEDIAN	120	3214	28	826	9	188	70	1738	10	391	3	71
50-79% OF MSAAMD MEDIAN	86	3253	25	788	4	216	47	1782	9	476	1	11
80-98% OF MSAAMD MEDIAN	89	3497	32	1289	10	407	38	1334	8	447	1	20
100-119% OF MSAAMD MEDIAN	400	24312	164	9010	32	2403	155	7852	35	2839	14	2208
120% OR MORE OF MSAAMD MEDIAN	9	388	4	183			5	175				
INCOME NOT AVAILABLE 6/	802	37167	269	12820	57	3254	387	14676	69	4397	20	2820
TOTAL 14/												

AGGREGATE TABLE 8-1: REASONS FOR DENIAL OF APPLICATIONS FOR FHA, FSARRIS, AND VA HOME-PURCHASE LOANS, 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2007

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Applicant Characteristics	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total / 22	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
RACE 6/																				
AMERICAN INDIAN/ALASKA NATIVE																				
ASIAN																				
BLACK OR AFRICAN AMERICAN																				
NAT HAWAIIAN/OTHER PACIFIC ISL																				
WHITE																				
2 OR MORE MINORITY RACES																				
JOINT (WHITE/MINORITY RACE)																				
RACE NOT AVAILABLE 6/																				
ETHNICITY 7/																				
HISPANIC OR LATINO																				
NOT HISPANIC OR LATINO																				
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO)																				
ETHNICITY NOT AVAILABLE 6/																				
MINORITY STATUS 8/																				
WHITE NON-HISPANIC																				
OTHERS, INCL. HISPANIC																				
GENDER 19/																				
MALE																				
FEMALE																				
JOINT (MALE/FEMALE)																				
GENDER NOT AVAILABLE 6/																				
INCOME 9/																				
LESS THAN 50% OF MSA/MO MEDIAN																				
50-79% OF MSA/MO MEDIAN																				
80-99% OF MSA/MO MEDIAN																				
100-119% OF MSA/MO MEDIAN																				
120% OR MORE OF MSA/MO MEDIAN																				
INCOME NOT AVAILABLE 6/																				

AGGREGATE TABLE #2: REASONS FOR DENIAL OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2007

MSAMD: 17780 - COLLEGE STATION-BRYAN, TX

Applicant Characteristics	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total/22		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
RACE 5/																					
AMERICAN INDIAN/ALASKA NATIVE	5	33	1	7	1	7	1	50	1	7	4	27	1	50	1	13	1	7	15	100	
ASIAN	11	14	1	1	27	38	3	4	10	13	5	7	3	4	1	1	15	20	76	100	
BLACK OR AFRICAN AMERICAN	68	17	20	5	134	33	45	11	22	5	24	6	29	7	69	17	69	17	411	100	
NAT HAWAIIAN/OTHER PACIFIC ISL	2	17			3	25					2	17	1	8	4	33	4	33	12	100	
WHITE	5	11	1	2	16	36	5	11	2	4	2	4	2	4	8	18	6	13	45	100	
2 OR MORE MINORITY RACES																					
JOINT (WHITE/MINORITY RACE)																					
RACE NOT AVAILABLE 6/																					
ETHNICITY 7/																					
HISPANIC OR LATINO	5	8	1	2	27	42	8	13	2	3	7	11	4	6	10	16	10	16	64	100	
NOT HISPANIC OR LATINO	81	18	19	4	138	31	37	8	31	7	28	6	33	7	1	0	78	17	446	100	
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO)																					
ETHNICITY NOT AVAILABLE 6/																					
MINORITY STATUS 8/																					
WHITE NON-HISPANIC	63	18	17	5	105	31	36	10	20	6	17	5	27	8	58	17	58	17	942	100	
OTHERS, INCL. HISPANIC	23	13	4	2	61	35	13	8	13	8	18	10	10	8	1	1	30	17	173	100	
GENDER 19/																					
MALE	36	16	15	7	73	32	19	8	5	2	14	6	22	10	44	19	44	19	229	100	
FEMALE	17	15	1	1	45	39	7	6	16	14	7	6	9	8	13	11	13	11	115	100	
JOINT (MALE/FEMALE)	35	18	6	3	56	29	25	13	12	6	15	8	9	5	35	18	35	18	193	100	
GENDER NOT AVAILABLE 6/																					
INCOME 6/																					
LESS THAN 50% OF MSAMD MEDIAN	16	21	1	1	47	63	1	1	2	3	3	4	2	3	3	4	3	4	75	100	
50-79% OF MSAMD MEDIAN	20	21	5	5	42	44	4	4	5	5	4	4	1	1	1	1	14	15	95	100	
80-99% OF MSAMD MEDIAN	8	17	1	2	15	33	5	11	6	13	5	11	1	2	5	11	5	11	43	100	
100-119% OF MSAMD MEDIAN	10	23	3	7	19	44	1	2	1	2	2	5	3	7	4	9	4	9	46	100	
120% OR MORE OF MSAMD MEDIAN	33	11	13	4	57	20	43	15	21	7	22	8	34	12	1	0	66	23	290	100	
INCOME NOT AVAILABLE 6/	4	33			1	8					1	8	3	25	3	25	3	25	12	100	

AGGREGATE TABLE B.3. REASONS FOR DENIAL OF APPLICATIONS TO REFINANCE LOANS ON 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2007

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Applicant Characteristics	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total/22		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
RACE 5/																					
AMERICAN INDIAN/ALASKA NATIVE	1	10			4	40	2	20			1	10	1	10			1	10	1	10	10
ASIAN							1	20			1	20					2	40	2	40	5
BLACK OR AFRICAN AMERICAN	4	7			22	37	10	17	1	2	1	2	6	10			15	25	15	25	59
NAT HAWAIIAN/OTHER PACIFIC ISL.																					
WHITE	38	13			88	23	78	25	4	1	17	6	18	8			78	26	289	100	299
2 OR MORE MINORITY RACES							1	100			1	50					1	50	2	100	2
JOINT (WHITE/MINORITY RACE)																					1
RACE NOT AVAILABLE 6/	15	10			50	34	27	18	1	1	5	3	15	10			33	23	146	100	146
ETHNICITY 7/																					
HISPANIC OR LATINO	4	7			15	25	11	18	1	2	4	7	9	15			16	27	16	27	60
NOT HISPANIC OR LATINO	38	12	1	0	77	24	83	25	5	2	18	6	21	6			83	25	326	100	326
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO)					1	25											3	75	3	75	4
ETHNICITY NOT AVAILABLE 6/	16	12			51	39	23	17			4	3	10	8			28	21	132	100	132
MINORITY STATUS 8/																					
WHITE NON-HISPANIC	34	13			55	21	70	27	4	2	15	6	15	6			64	25	257	100	257
OTHERS, INCL. HISPANIC	8	8	1	1	38	29	23	18	2	2	7	5	15	12			36	28	130	100	130
GENDER 19/																					
MALE	13	8			42	28	43	27	2	1	9	6	9	6			41	26	159	100	159
FEMALE	17	16	1	1	31	30	18	17	3	3	3	3	5	5			26	25	104	100	104
JOINT (MALE/FEMALE)	16	9			42	24	39	22	1	1	11	6	17	10			48	28	174	100	174
GENDER NOT AVAILABLE 6/	12	14			29	34	17	20			3	4	9	11			15	18	85	100	85
INCOME 6/																					
LESS THAN 50% OF MSAMD MEDIAN	6	13			18	38	9	19	1	2	3	6	1	2			9	19	47	100	47
50-79% OF MSAMD MEDIAN	19	20			43	46	15	16	1	1	2	2	2	2			11	12	93	100	93
80-99% OF MSAMD MEDIAN	4	7			19	35	11	20			3	6	6	11			11	20	54	100	54
100-119% OF MSAMD MEDIAN	5	9			17	32	14	26			2	4	3	6			12	23	53	100	53
120% OR MORE OF MSAMD MEDIAN	23	9	1	0	41	16	66	25	4	2	15	6	28	11			82	32	280	100	280
INCOME NOT AVAILABLE 6/	1	7			6	40	2	13			1	7					5	33	15	100	15

AGGREGATE TABLE B-4. REASONS FOR DENIAL OF APPLICATIONS FOR HOME IMPROVEMENT LOANS: 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2007

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Applicant Characteristics	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total/22			
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%		
RACE 5/																						
AMERICAN INDIAN/ALASKA NATIVE	1	20			2	40	1	20					1	20						5	100	
ASIAN	2	67					1	33												3	100	
BLACK OR AFRICAN AMERICAN	2	5	1	3	32	86	1	3												1	3	
NAT HAWAIIAN/OTHER PACIFIC ISL					2	100															2	100
WHITE	19	11	1	1	106	59	32	18					2	1						19	11	
2 OR MORE MINORITY RACES																						
JOINT (WHITE/MINORITY RACE)					1	50		50													2	100
RACE NOT AVAILABLE 6/	6	11			32	59	9	17					1	2						6	11	
ETHNICITY 7/																						
HISPANIC OR LATINO	3	8			24	65	5	14					2	1						5	14	
NOT HISPANIC OR LATINO	20	11	1	1	112	62	30	17					1	14						16	9	
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO)					4	57	2	29					1	14						7	100	
ETHNICITY NOT AVAILABLE 6/	7	12	1	2	35	61	8	14					1	2						5	9	
MINORITY STATUS 8/																						
WHITE NON-HISPANIC	17	12	1	1	80	58	28	19					2	1						13	9	
OTHERS, INCL. HISPANIC	7	8	1	1	62	71	10	11					1	1						6	7	
GENDER 19/																						
MALE	13	16			46	58	15	18					2	2						6	7	
FEMALE	7	10	2	3	52	72	6	8					2	2						5	7	
JOINT (MALE/FEMALE)	5	6			53	60	18	18					2	2						12	14	
GENDER NOT AVAILABLE 6/	5	13			24	60	8	20												3	8	
INCOME 9/																						
LESS THAN 50% OF MSAMD MEDIAN	9	16			41	71	3	5					1	2						2	3	
50-79% OF MSAMD MEDIAN	6	13			34	71	4	8												4	8	
80-99% OF MSAMD MEDIAN	2	7			21	75	3	11					1	4						2	7	
100-119% OF MSAMD MEDIAN	5	19			13	50	4	15					2	2						3	12	
120% OR MORE OF MSAMD MEDIAN	8	7			63	53	30	25					2	2						15	13	
INCOME NOT AVAILABLE 6/					3	75	1	25													4	100

Appendix – D HUD FOIA Discrimination Complaints Request Response



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

March 1, 2010

Mr. Art Roach, Assistant Manager
Community Development Services
City of Bryan
405 W 28th Street
Bryan, TX 77803

Dear Mr. Roach:

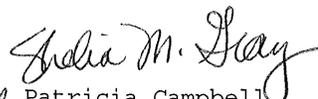
Subject: Freedom of Information Act (FOIA) Request

This is in response to your letter dated January 25, 2010, requesting a list of Fair Housing complaints filed in Bryan, TX during the period January 1, 2005 through December 31, 2009.

We have enclosed a list of the complaints filed in Bryan, TX during the period January 1, 2005 through December 31, 2009. The list includes the date the complaint was filed; the basis the complaint was filed under, (including multiples if filed as such); the number of days the case was open; closure type; and issues related to each complaint. We are providing this information at no charge to you.

If you have any questions, please feel free to contact Robert C. Allen, Public Trust Officer, at (817) 978-5873.

Sincerely,

for 
Patricia Campbell
FOIA Liaison

Date: 3/1/10

TITLE VIII ACTIVITY Bryan Texas

For Period: 1/1/05 Through 12/31/09

Total Cases: 10

Hudfileno	Hud Date		Date Case Closed	Why Case Closed	Issue	Basis	City
	Filed						
060508998	06/06/05		07/12/06	No cause determination	320 Discriminatory advertising, statements and notices 312 Discriminatory refusal to rent and negotiate for rental 332 False denial or representation of availability - rental 382 Discrimination in terms/conditions/privileges relating to rental	Family Status, Family Status, Family Status,	Bryan Bryan Bryan
060511558	08/10/05		01/04/06	No cause determination	410 Steering 312 Discriminatory refusal to rent and negotiate for rental	National Origin, Disability, National Origin, Disability,	Bryan Bryan
060513588	09/26/05		06/06/06	Complaint withdrawn by complainant after resolution	310 Discriminatory refusal to rent 382 Discrimination in terms/conditions/privileges relating to rental	Race, Race,	Bryan Bryan

TITLE VIII ACTIVITY Bryan Texas

For Period: 1/1/05 Through 12/31/09

Total Cases: 10

Hudfile no	Hud Date Filed	Date Case Closed	Why Case Closed	Issue	Basis	City
060602858	12/22/05	03/29/06	No cause determination	382 Discrimination in terms/conditions/privileges relating to rental	Sex,	Bryan
060604498	02/09/06	05/12/06	Complaint withdrawn by complainant after resolution	510 Failure to make reasonable accommodation 382 Discrimination in terms/conditions/privileges relating to rental	Disability,	Bryan
060612818	09/08/06	05/15/07	Dismissed for lack of jurisdiction	380 Discriminatory/terms, conditions, privileges, or services and facilities 450 Discriminatory acts under Section 818 (coercion, Etc.)	Sex, Harassment,	Bryan
060706328	03/30/07	06/27/07	Complainant failed to cooperate	380 Discriminatory/terms, conditions, privileges, or services and facilities	Disability, Family Status, Religion,	Bryan
060906408	03/27/09	06/26/09	Unable to locate complainant	310 Discriminatory refusal to rent 380 Discriminatory/terms, conditions, privileges, or services and facilities	Race, Race,	Bryan Bryan

Date: 3/1/10

TITLE VIII ACTIVITY Bryan Texas

For Period: 1/1/05 Through 12/31/09

Total Cases: 10

Hudfileno	Hud Date	Date Case Closed	Why Case Closed	Issue	Basis	City
	Filed					
060910498	07/15/09	10/30/09	Complaint withdrawn by complainant without resolution	380 Discriminatory terms, conditions, privileges, or services and facilities under Section 818 (coercion, Etc.)	Disability,	Bryan
060910528	07/15/09	11/07/09	Complainant failed to cooperate	380 Discriminatory terms, conditions, privileges, or services and facilities	Race,	Bryan

**Appendix – E TWC Public Information Discrimination Complaints
Request Response**

Texas Workforce Commission

A Member of the Texas Workforce Solutions

February 3, 2010

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

RE: Request for Info regarding Fair
Housing Complaints in Bryan, TX

Date Received: 1/27/2010
Information Request No.: 100127-016
Total Charges: \$0.00
Balance Due: \$0.00

Dear Art Roach, Assistant Manager,

Enclosed is the information that you requested regarding the above-referenced subject. There is no fee for providing this information to you.

If you have any questions about the enclosed information, please feel free to contact me at the address listed or call me at the number listed below. When making any further inquiries about this request, please reference the Information Request Number listed above.

Sincerely,



David Summers
Legal Assistant
512-463-2423

Received
FEB 05 2010
Community Development

Texas Workforce Commission, Open Records Section
• 101 E. 15th Street, Room 266 • Austin, Texas 78778-0001 • Tel: (512) 463-2422 • Fax: 512/463-2990 •
• Relay Texas: 800-735-2989 (TDD) 800-735-2988 (Voice) • open.records@twc.state.tx.us • www.twc.state.tx.us •
Equal Opportunity Employer/Services

Appendix – F Affirmative Marketing Policy

II. 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 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 Services 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 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.

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 Services 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 of good faith efforts have been made:**

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

b) **To determine results:**

- 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 Services 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
3971 E. 29th Street
Bryan, Texas 77802

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

Housing Authority of Bryan
517 Bryant
Bryan, Texas 77803

Twin City Mission, Inc.
PO BOX 3490
BRYAN TX 77805

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

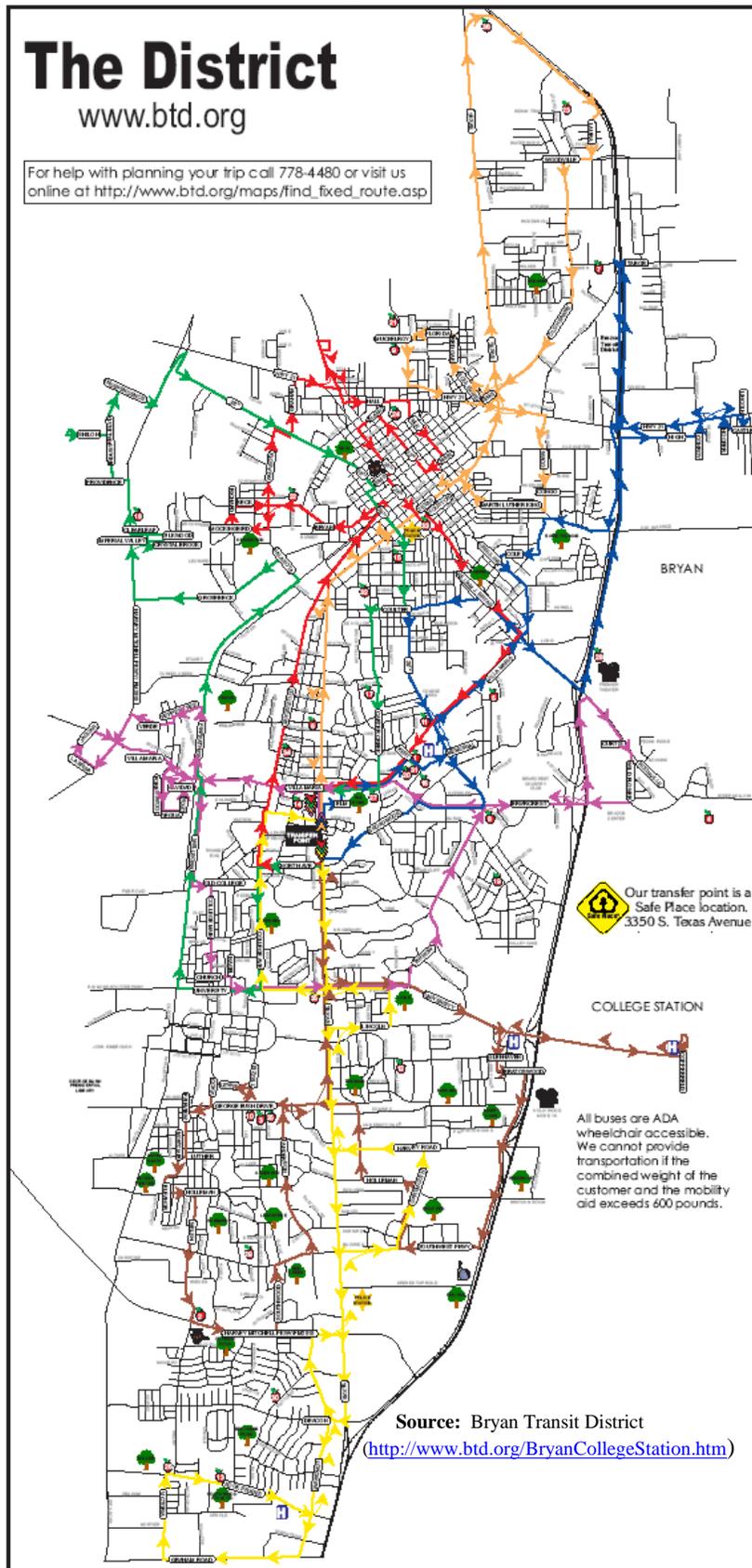
Brazos Valley Community Action Agency
1500 University Dr. East
College Station, Texas 77802

Habitat for Humanity
119 Lake
Bryan, Texas 77801

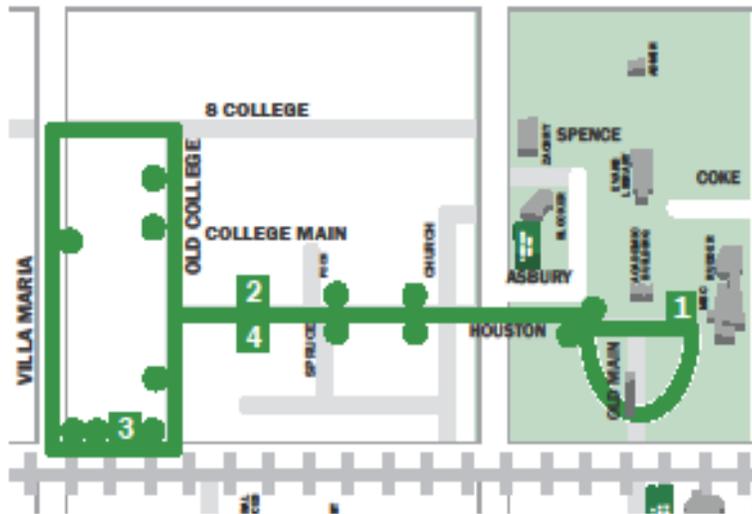
National Association for the Advancement of Colored People (NAACP)
Brazos County Branch
PO BOX 665
BRYAN TX 77806

Local Union of Latin American Citizens (LULAC)
LULAC Council 4893 of College Station, TX
2404 Pintail Loop
College Station, TX 77845
lulackelly@neo.tamu.edu

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



Texas A&M University - Bryan Bus Route Maps



Source: Texas A&M University Transportation Services (<http://transport.tamu.edu/transit/offcampus.aspx>)