

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



**URBAN COUNTY OF
WILLIAMSON COUNTY, TEXAS**

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Williamson County, Texas

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1. Introduction

A. Introduction to the Analysis of Impediments

The Urban County of Williamson County has prepared an Analysis of Impediments to Fair Housing Choice to satisfy the requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. As a result, the Urban County is charged with the responsibility of conducting its CDBG programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities, including local units of government which receive federal funds through Williamson County.

Entitlement communities receiving CDBG entitlement funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status or national origin
- Promote housing that is accessible to and usable by persons with disabilities, and
- Comply with the non-discrimination requirements of the Fair Housing Act. These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice.

The Analysis of Impediments to Fair Housing Choice (AI) is a review of a jurisdiction's laws, regulations and administrative policies, procedures and practices affecting the location, availability and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

B. Obligation of Urban Counties to Affirmatively Further Fair Housing Choice

A recent legal settlement involving a HUD urban county entitlement in the state of New York has brought more attention to fair housing and, specifically, the way in which entitlement communities comply with the required fair housing certifications. Each year when an entitlement community submits its Annual Plan to HUD, the chief elected official is required to certify that the jurisdiction will affirmatively further housing. A summary of the legal settlement involving Westchester County, NY and its non-compliance with this required certification is provided below because of the implications for all urban county entitlements, including Williamson County.

In August 2009, Westchester County, NY settled a fair housing lawsuit brought against the county by the Anti-Discrimination Center of Metro New York, Inc. The outcome of this lawsuit is relevant to all HUD urban counties.

This \$180 million lawsuit filed in April 2006 charged that Westchester County failed to fulfill its obligation to affirmatively further fair housing and ensure non-discrimination in its programs. Westchester County is an urban county entitlement under HUD's CDBG Program. As a condition of federal funding, all such HUD entitlements certify to HUD each year that they will conduct their entitlement programs in a non-discriminatory manner that affirmatively furthers fair housing in accordance with the Civil Rights Act of 1964 and the federal Fair Housing Act. In making this certification, Westchester County

was required to identify impediments to fair housing choice, take action to overcome those impediments, and to maintain records of its analysis and actions.

In the lawsuit, the Center charged that:

- Westchester County is a racially segregated county
- Westchester County's Analysis of Impediments to Fair Housing Choice (AI) was flawed because it considered housing needs based solely on income and failed to fully consider racial segregation and housing needs based on race
- Westchester County failed to inform municipalities receiving CDBG funds of their own obligation to consider the housing needs of persons living outside the communities, not just the needs of residents living within their municipal limits
- Westchester County failed to require municipalities receiving CDBG funds to increase the availability of affordable housing or otherwise affirmatively further fair housing
- As a result of the above, Westchester County made a false claim when it certified to HUD that the County would affirmatively further fair housing.

At issue in this case was not whether Westchester County created affordable housing. In fact, since 1998, the County spent over \$50 million in federal and state funds to aid in the construction of 1,370 affordable rental units and another 334 affordable owner units. It was the *geographic location* of the affordable housing units that were created within the County that was the critical factor in the lawsuit.

The Center alleged that the county's AI did not analyze how its placement of affordable housing affected segregation and racial diversity. It concluded that the county assisted the development of affordable housing units in lower income communities and that as a result, it increased the pattern of racial segregation in Westchester County. Furthermore, the suit charged that the county violated its cooperation agreements with local units of government which prohibits expenditures of CDBG funds for activities in communities that do not affirmatively further fair housing within their jurisdiction or otherwise impede the county's action to comply with its fair housing certifications.

Faced with the threat of losing the \$180 million lawsuit and being cut off from another \$30 million in HUD funding, Westchester County agreed to a settlement with HUD and the Anti-Discrimination Center of Metro New York. Under the terms of the settlement, the county will pay \$21.6 million to HUD in non-federal funds. These funds will be deposited in the county's HUD account and used to build new affordable housing units in specified census tracts with populations of less than 3% Black and 7% Hispanic residents. An additional \$11 million will be paid to HUD, the Center and its counsel. The county will add \$30 million to its capital budget to build affordable housing in non-impacted (i.e., predominantly White) areas. It is anticipated that the county will issue bonds to meet its financial obligations under the settlement.

The significance of this legal settlement for urban county entitlements throughout the U.S. is clear. First, *the requirement to affirmatively further fair housing applies to all aspects of county government, not just HUD programs*. Second, the lawsuit confirms that *an urban county has an obligation to ensure that each local unit of government within its boundary affirmatively furthers fair housing*. When an urban county makes this pledge to HUD, it is making the promise not just in its own right but also on behalf of each local unit of government in the county. This does not necessarily mean that each municipality must finance and develop affordable housing, but it does mean that no municipality may impede or obstruct the creation of such housing by other entities. An urban county should provide CDBG and HOME funds to municipalities that affirmatively further fair housing. Furthermore, an urban county should *not* provide CDBG or HOME funds to municipalities that impede fair housing as such actions undermine the urban county's own obligation to

affirmatively further fair housing. Finally, an urban county must take action to eliminate barriers to fair housing wherever they may exist in the county.

C. Fair Housing Choice

Equal and free access to residential housing (housing choice) is a fundamental right that enables members of the protected classes to pursue personal, educational, employment or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials and private citizens must embrace if equality of opportunity is to become a reality.

The federal Fair Housing Act prohibits discrimination in housing based on a person's race, color, religion, sex, disability, familial status or national origin. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This Analysis encompasses the following five areas related to fair housing choice:

- The sale or rental of dwellings (public and private)
- The provision of financing assistance for dwellings
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration, and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development (HUD) regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570 (i.e., the CDBG program regulations).

As a federal entitlement community, the Urban County of Williamson County has specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support the jurisdictions' initiatives to affirmatively further fair housing.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination in a jurisdiction and working toward its elimination
- Promoting fair housing choice for all people
- Providing racially and ethnically inclusive patterns of housing occupancy
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities, and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

This Analysis will:

- Evaluate population, household, income and housing characteristics by protected classes in each of the jurisdictions
- Evaluate public and private sector policies that impact fair housing choice
- Identify blatant or de facto impediments to fair housing choice where any may exist, and
- Recommend specific strategies to overcome the effects of any identified impediments.

HUD defines an impediment to fair housing choice as any actions, omissions or decisions that restrict or have the effect of restricting the availability of housing choices, based on race, color, religion, sex, disability, familial status or national origin.

This Analysis serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. The elected governmental bodies are expected to review and approve the Analysis and use it for direction, leadership and resources for future fair housing planning.

The Analysis will serve as a point-in-time baseline against which future progress in terms of implementing fair housing initiatives will be evaluated and recorded.

D. The Federal Fair Housing Act

i. What housing is covered?

The federal Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

ii. What does the Fair Housing Act prohibit?

a. In the sale and rental of housing

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

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



b. In mortgage lending

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

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

c. Other prohibitions

It is illegal for anyone to:

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

iii. Additional Protections for People with Disabilities

If someone has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities, or has a record of such a disability, or is regarded as having such a disability, a landlord may not:

- Refuse to let the disabled person make reasonable modifications to a dwelling or common use areas, at the disabled person's expense, if necessary for the disabled person to use the housing. Where reasonable, the landlord may permit changes only if the disabled person agrees to restore the property to its original condition when he or she moves.
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing.

For example, a building with a "no pets" policy must make a reasonable accommodation and allow a visually impaired tenant to keep a guide dog.

iv. Housing Opportunities for Families with Children

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

- A parent or
- A person who has legal custody of the child or children or



- The designee of the parent or legal custodian, with the parent or custodian's written permission.

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

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

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

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

E. The Texas Fair Housing Act

The Texas Fair Housing Act (TFHA), codified in Chapter 301 of the Texas Property Code, prohibits housing discrimination based on the same seven protected classes as the federal Fair Housing Act. The TFHA covers most housing but in some circumstances, exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker and housing operated by organizations and private clubs that limit occupancy to members.

One distinction between the TFHA and national standards is the interpretation of disability. Section 301.003(6) of the Property Code follows its definition of disability with specific exceptions that do not appear in the Fair Housing Act, Americans with Disabilities Act (ADA) or Rehabilitation Act: "The term [disability] does not include current illegal use or addiction to any drug or illegal or federally controlled substance and does not apply to an individual because of an individual's sexual orientation or because that individual is a transvestite." While persons currently with or recovering from substance abuse problems are considered to have a disability under both the ADA and the Fair Housing Act, Texas law is generally interpreted as not prohibiting discrimination against alcoholics or drug users in treatment or recovery. National laws do not prohibit discrimination on the basis of sexual orientation or gender identity, but they also do not specifically exclude these categories.

The TFHA includes the same prohibitions involving the sale or rental of housing and mortgage lending as the federal Fair Housing Act.

The Texas Workforce Commission Civil Rights Division (TWCCRD) is the administrative agency tasked with overseeing the processing and investigation of fair housing complaints filed with the State of Texas. TWCCRD was created by the Texas Commission on Human Rights Act, which charged the agency with enforcing the state's anti-discrimination laws.

State or local laws may be certified as substantial equivalent to the federal Fair Housing Act when the U.S. Department of Housing and Urban Development (HUD) determines that the law provides rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Act. Currently, the TWCCRD participates in HUD's Fair

Housing Assistance Program (FHAP) by virtue of the Texas Fair Housing Act having been deemed substantially equivalent to the federal Fair Housing Act. TWCCRD's participation allows the agency the opportunity to receive funding to support a variety of fair housing administrative and enforcement activities, including complaint processing, training, implementation of data and information systems and other special projects.

F. Comparison of Accessibility Standards

There are several standards of accessibility that are referenced throughout the AI. These standards are listed below along with a summary of the features within each category or a direct link to the detailed standards.

i. Fair Housing Act

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

- There must be an accessible entrance on an accessible route.
- Public and common areas must be accessible to persons with disabilities
- Doors and hallways must be wide enough for wheelchairs
- All ground floor units and all units in elevator buildings must have:
 - ✓ An accessible route into and through the unit
 - ✓ Accessible light switches, electrical outlets, thermostats and other environmental controls
 - ✓ Reinforced bathroom walls to allow later installation of grab bars, and
 - ✓ Kitchens and bathrooms that can be used by people in wheelchairs.

If a building with four or more units has no elevator and will be ready for first occupancy after March 13, 1991, these standards apply to ground floor units. These requirements for new buildings do not replace any more stringent standards in state or local law.

ii. Americans with Disabilities Act (ADA)¹

Title II of the ADA applies to state and local services, including state and local housing programs. Government entities are obliged to assure that housing financed through state and local programs complies with ADA accessibility guidelines. A complete description of the guidelines can be found at www.ada.gov/stdspdf.htm.

iii. Uniform Federal Accessibility Standards (UFAS)

UFAS accessibility standards are required for facility accessibility by people with motor and sensory disabilities for Federal and federally-funded facilities. These standards are to be applied during the design, construction, and alteration of buildings and facilities to the extent required by the Architectural Barriers Act of 1968, as amended. A complete description of the guidelines can be found at www.access-board.gov/ufas/ufas-html/ufas.htm.



iv. Visitability Standards

The term “visitability” refers to single-family housing designed in such a way that it can be lived in or visited by people with disabilities. A house is visitable when it meets three basic requirements:

- At least one no-step entrance
- Doors and hallways wide enough to navigate a wheelchair through, and
- A bathroom on the first floor big enough to get into in a wheelchair, and close the door.

v. Universal Design

Universal design is the design of products and environments to be usable by all people, to the greatest extent possible, without adaptation or specialized design. Seven principles guide Universal Design. These include:

- Equitable use (e.g., make the design appealing to all users)
- Flexibility in use (e.g., accommodate right- or left-handed use)
- Simple and intuitive use (e.g., eliminate unnecessary complexity)
- Perceptible information (e.g., provide compatibility with a variety of techniques or devices used by people with sensory limitations)
- Tolerance for error (e.g., provide fail-safe features)
- Low physical effort (e.g., minimize repetitive actions)
- Size and space for approach and use (e.g., accommodate variations in hand and grip size).

G. Methodology

The firm of Mullin & Lonergan Associates, Inc. (M&L) was retained as consultants to conduct the Analysis of Impediments to Fair Housing Choice. M&L utilized a comprehensive approach to complete the Analysis involving the Urban County of Williamson County. The following sources were utilized:

- The most recently available demographic data regarding population, household, housing, income, and employment at the census tract and municipal level
- Public policies affecting the siting and development of housing
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes
- The Consolidated Plan, Annual Plans and CAPERs for the Urban County
- Fair housing complaints filed with HUD and the Texas Workforce Commission Civil Rights Division
- Real estate advertisements from area newspapers of record
- 2010 CHAS data tables available from HUD
- Residential segregation data available from Census Scope



- Interviews conducted with agencies and organizations that provide housing and housing related services to members of the protected classes.

i. Urban County Definition

Throughout this report, emphasis is placed on the Urban County rather than on the entire county of Williamson County. The Urban County of Williamson County includes all of the unincorporated area within Williamson County and the incorporated cities that have opted to participate in the Urban County entitlement designation: Cedar Park, Georgetown, Granger, Jarrell, Leander, Liberty Hill, Taylor, Thrall and Weir.

H. Use and Presentation of Data

In all cases, the latest available data was used to describe the most appropriate geographic unit of analysis. In most cases, 2010 Census data and 2010 American Community Survey (ACS) were available and incorporated into this report.

For the convenience of the reader, demographic and housing data included in this report are presented for:

- The entirety of Williamson County
- The Urban County of Williamson County, which encompasses the unincorporated area plus the incorporated cities of Cedar Park, Georgetown, Granger, Jarrell, Leander, Liberty Hill, Taylor, Thrall and Weir.

I. Development of the AI

i. Lead Agency

The Williamson County CDBG Office was the lead agency for the preparation and implementation of the AI. The CDBG Grants Coordinator identified and invited numerous stakeholders to participate in the process for the purpose of developing a thorough analysis with a practical set of recommendations to eliminate impediments to fair housing choice, where identified.

ii. Agency Consultation

The County engaged in a consultation process with local public agencies, nonprofit organizations and other interested entities in an effort to develop a community planning process for the AI. A series of written questionnaires were mailed to many of the interviewees and detailed lists of issues were developed for the focus group sessions and interviews.

During the week of October 3, 2011, the consulting team conducted a series of focus group sessions and individual interviews to identify current fair housing issues impacting the various agencies and organizations and their clients. Comments received through these meetings and interviews are incorporated throughout the AI, where appropriate.

A public meeting was held to solicit comment on fair housing issues on the evening of Tuesday, October 4 beginning at 5:30 pm in the County Courthouse. Public notices announcing the meeting were published in several local newspapers. No one attended the public meeting.

A list of the stakeholders identified to participate in the AI process is included in Appendix A.

J. The Relationship between Fair Housing and Affordable Housing

As stated in the Introduction, fair housing choice is defined as the ability of persons, regardless of race, color, religion, sex, disability, familial status, or national origin, of similar income levels to have available to them the same housing choices. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This AI analyzes a range of fair housing issues regardless of a person's income. To the extent that members of the protected classes tend to have lower incomes, then access to fair housing is related to affordable housing. In many areas across the U.S., a primary impediment to fair housing is a relative absence of affordable housing. Often, however, the public policies implemented in towns and cities create, or contribute to, the lack of affordable housing in these communities, thereby disproportionately affecting housing choice for members of the protected classes.

This document goes well beyond an analysis of the adequacy of affordable housing in Williamson County. This AI defines the relative presence of members of the protected classes within the context of factors that influence the ability of the protected classes to achieve equal access to housing and related services.



2. Demographic Information

A. Demographic Profile

i. Population Trends

Williamson County represents one of the fastest-growing jurisdictions in a region that has experienced sustained and significant population growth since 1990. The county is part of the five-county Austin-Round Rock Metropolitan Statistical Area (MSA) and includes 15 incorporated areas, six of which extend into neighboring counties. Georgetown, the county seat, is situated about 30 miles north of Austin. Williamson County contains 1,135 square miles of land area, across which 249,967 people were spread in 2000 at a density of 223 people per square mile.

The strong surge in the county's population in recent decades can be attributed to in-migration driven by sustained employment growth, according to the 2004 HUD Comprehensive Market Analysis Report for the Austin-Round Rock MSA. The region is the trade center of central Texas and has seen particularly rapid economic growth related to the high-tech and service industry sectors. As the influx of in-migration centered on Austin has caused the cost of housing in the region to rise, Williamson County has emerged as a more affordable area to locate, within reasonable commuting distance to many jobs.

Net population gains in Williamson County have been significant since 1990, with a three-fold increase in the last 30 years. Since 2000, the population has increased 69%. Population gains have outpaced the Austin-Round Rock MSA and Texas. Williamson County's population is almost 25% of the entire population for the MSA.

Figure 2-1
Population Trends, 1950-2010

	Williamson County		Austin-Round Rock MSA*		Texas	
	Total	% Change	Total	% Change	Total	% Change
1950	38,853		256,645		7,711,194	
1960	35,044	-9.8%	301,261	17.4%	9,579,677	24.2%
1970	37,305	6.5%	398,938	32.4%	11,198,655	16.9%
1980	76,521	105.1%	585,051	46.7%	14,225,513	27.0%
1990	139,551	82.4%	846,227	44.6%	16,986,510	19.4%
2000	249,967	79.1%	1,249,763	47.7%	20,851,820	22.8%
2010	422,679	69.1%	1,716,289	37.3%	25,145,561	20.6%

*The definition of the MSA containing Austin changed in 2003 when the Austin-San Marcos MSA became the Austin-Round Rock MSA. All data is based on the 2005 MSA (CBSA) definition.

Source: U.S. Census Bureau for 1950 - 2010 data

Population gains by municipality reflect the overall growth rate. Population gains in communities in the southern and central portions of the County, including Hutto and Georgetown, highlight the rapid rate. Hutto, for

example, began with a population of 630 in 1990 and rose to 14,698 by 2010, a gain of 2233%. Georgetown has experienced a more than three-fold increase in population since 1990.

Figure 2-2
Population Change by Municipality, 1990-2010

	1990	2000	2010	Change 1990-2010
Williamson County	139,551	249,967	422,679	202.9%
Florence	829	1,054	1,136	37.0%
Georgetown	14,842	28,339	47,400	219.4%
Granger	1,190	1,299	1,419	19.2%
Hutto	630	1,250	14,698	2233.0%
Liberty Hill	907	1,409	967	6.6%
Taylor	11,472	13,575	15,191	32.4%
Thrall	550	710	839	52.5%
Weir	220	591	450	104.5%
Remainder*	108,911	201,740	340,579	212.7%
Austin-Round Rock MSA	846,702	1,249,763	1,716,289	102.7%
Texas	16,987,754	20,851,820	25,145,561	48.0%

*Includes unincorporated territory as well as sections of five incorporated areas (Austin, Bartlett, Cedar Park, Leander and Round Rock) that are only partially in Williamson County.

Source: U.S. Census Bureau for 1990, 2000, and 2010 data

In addition to overall population growth, the Williamson County's minority population has expanded. Between 1990 and 2010, the number of non-White persons living in the county nearly doubled. Racial minorities constituted 21.8% of all residents in 2010, whereas they constituted only 12.6% in 1990.

> Observation

Population growth in Williamson County continues to significantly outpace statewide averages.



Figure 2-3
Racial and Ethnic Population Composition, 1990-2010

	White		Minority						Total Population	Hispanic Origin		
	Total	%	Black	Am. Ind. Eskimo	Asian, Pacific Islander	Other	Two or More	% of Population		Total	% of Total	
1990												
Williamson County	121,908	87.4%	6,862	508	1,844	8,420		*	12.6%	139,483	20,004	14.3%
Austin-Round Rock MSA	648,549	76.6%	79,591	3,071	18,965	96,024		*	23.3%	846,702	176,864	20.9%
Texas	12,774,791	75.2%	2,021,643	65,867	319,347	1,804,767		*	24.8%	16,987,754	4,339,921	25.5%
2000												
Williamson County	205,994	82.4%	12,790	1,130	6,793	17,976	5,284		17.6%	249,967	42,990	17.2%
Austin-San Marcos MSA	905,970	72.5%	99,432	7,092	44,899	159,378	32,992		27.5%	1,249,763	327,760	26.2%
Texas	14,799,505	70.9%	2,404,566	118,362	576,753	2,438,001	514,633		29.0%	20,851,820	6,669,666	32.0%
2010												
Williamson County	330,191	78.1%	26,196	2,629	20,433	29,336	13,481		21.8%	422,679	98,034	23.2%
Austin-Round Rock-San Marcos MSA	1,250,332	72.8%	127,397	13,452	83,780	186,455	54,873		27.1%	1,716,289	538,313	31.4%
Texas	17,701,552	70.3%	2,979,598	170,972	986,252	2,628,186	679,001		29.6%	25,145,561	9,460,921	37.6%

Source: U.S. Census 1990, 2000 and 2010

* Not reported in 1990

Diversity is also rising within the non-White population. In 1990, Black residents accounted for 5.6% of the county's minority population, and Asian/Pacific Islanders accounted for 1.9%. By 2010, the composition of the minority population had shifted. Black residents continued to increase, but their population share among all minorities shrank to 28.5% in 2010 from 38.9% in 1990. The Asian/Pacific Islander population increased from 1,844 in 1990 to 20,433 in 2010, a 1008% increase in 20 years, and account for 26% of minority residents.

The number of Hispanic residents in the county grew from 20,004 in 1990 to 98,034 in 2010, representing a population growth rate of 390%. Hispanic residents represent the largest ethnic group in the county.



Figure 2-4
Expansion of Diversity Among Racial Minorities, 1990-2010

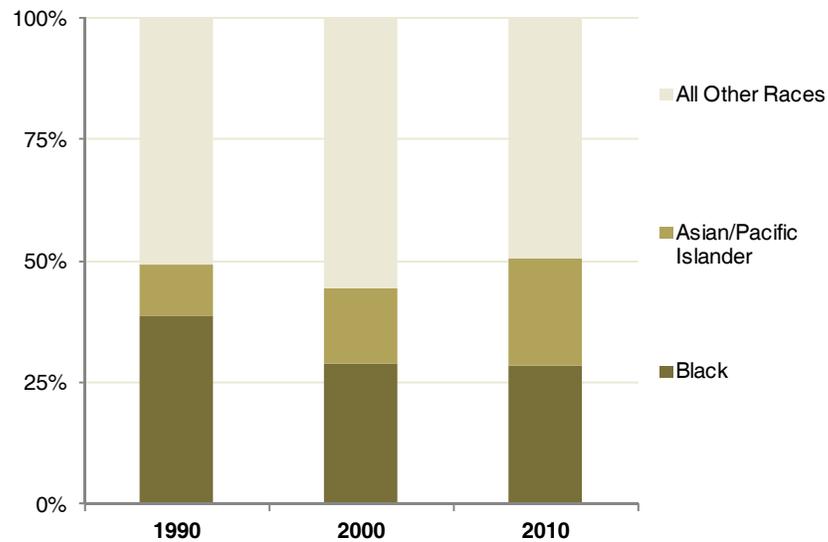
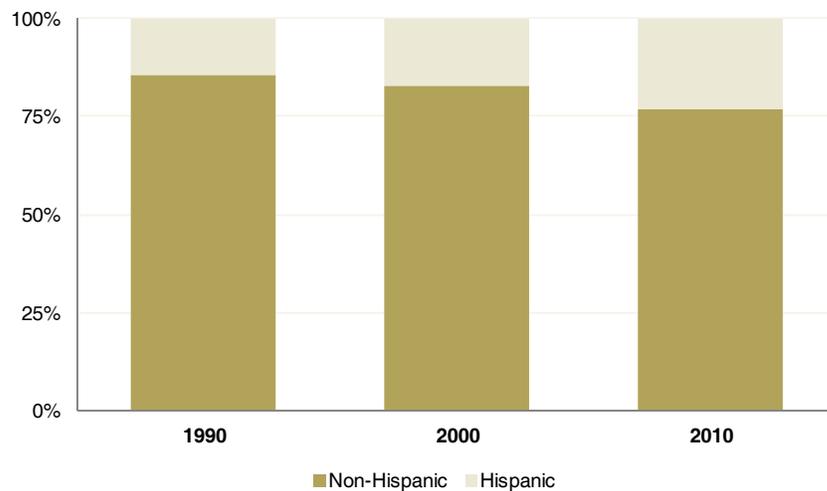


Figure 2-5
Increasing Hispanic Share of Population, 1990-2010



Observation

Racial minorities increased from 12.6% to 21.8% of the total population between 1990 and 2010.

Hispanics remain the largest minority group. However, the fastest-growing segment of the population has been Asian/Pacific Islanders, which increased 100%.



ii. **Areas of Racial and Ethnic Minority Concentration**

Williamson County’s Five-Year Consolidated Plan defines areas of racial or ethnic concentration as census tracts where the percentage of a single minority or ethnic group is at least 10 percentage points higher than across the county overall.

In 2010, Blacks comprised 6.2% of the population. Therefore, an area of Black concentration would include any census tract where the percentage of Black residents is 16.2% or higher. Of the 89 tracts within the county, three meet this criterion. An area of Asian concentration, by the same definition, would include any tract where the percentage of Asian residents is 14.8% or higher. Four tracts meet this criterion. An area of Hispanic concentration includes any tract where at least 33.2% of all residents are of Hispanic ethnicity; sixteen tracts qualify. In total, 22 census tracts across the county meet the definition for at least one type of racial or ethnic concentration.

The composition of race and ethnicity by census tract is detailed in Figure 2-7 and depicted graphically in the following maps.

Figure 2-7
Areas of Racial and/or Ethnic Concentration, 2010

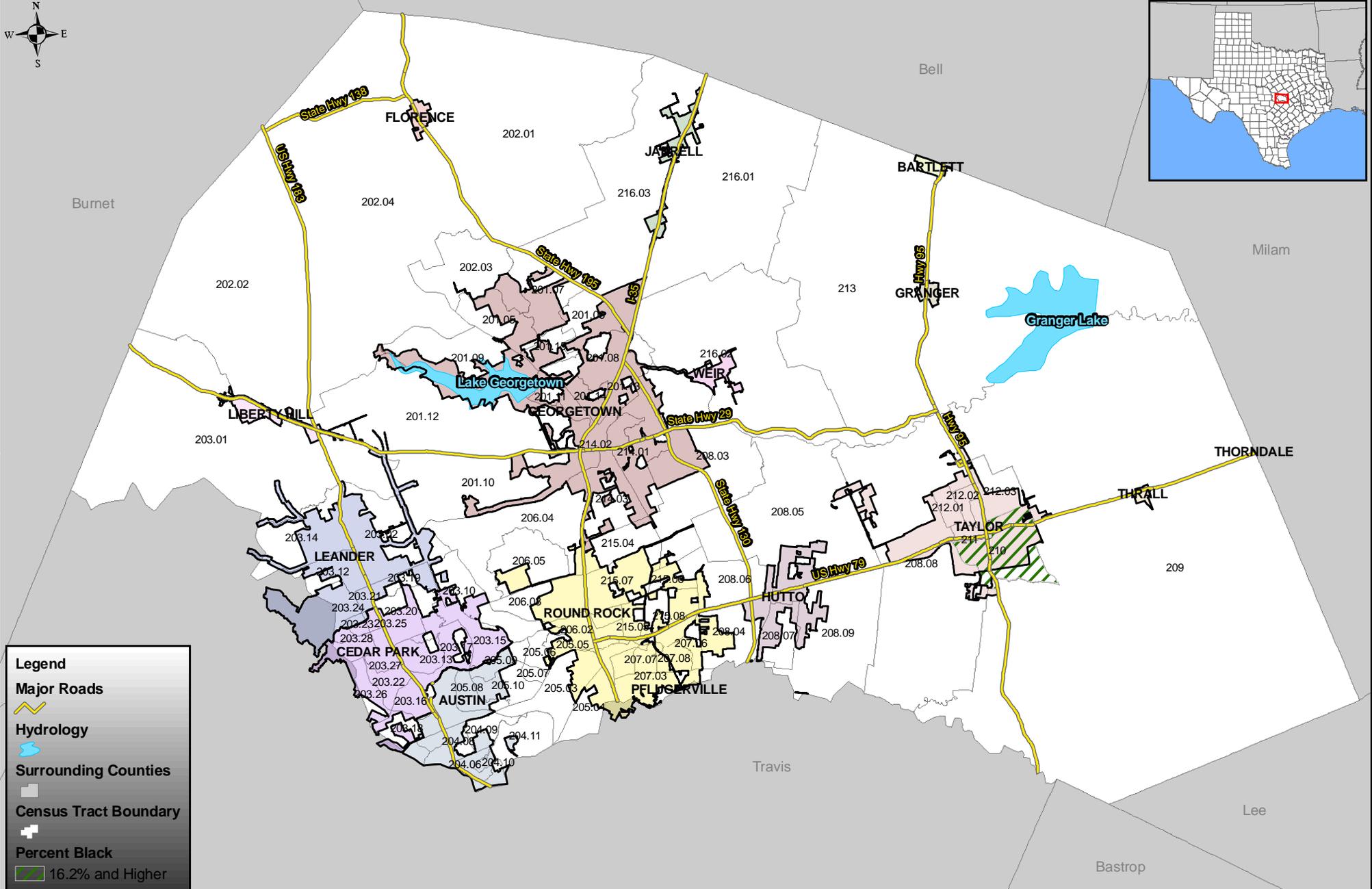
Tract	Population	Race and Ethnicity			
		White	Black	Asian	Hispanic
203.11	2,727	71.0%	4.3%	16.9%	16.7%
203.12	7,199	74.4%	5.1%	2.0%	33.9%
203.25	2,944	69.5%	7.9%	3.2%	37.3%
205.04	8,362	64.2%	11.0%	4.5%	38.6%
205.07	3,381	69.8%	5.9%	18.3%	13.1%
205.09	6,921	73.4%	2.6%	18.0%	11.8%
205.10	9,220	73.0%	3.5%	17.9%	11.4%
207.01	2,533	69.4%	7.1%	1.3%	59.1%
207.03	9,998	59.7%	16.2%	6.2%	32.8%
207.04	5,873	61.1%	10.5%	2.3%	44.8%
208.07	6,872	70.4%	16.2%	1.5%	32.3%
210	3,425	54.7%	18.3%	0.6%	63.4%
211	2,628	67.7%	7.0%	0.6%	56.2%
212.03	2,597	73.1%	9.0%	1.3%	36.8%
213	4,697	79.1%	6.5%	0.9%	39.2%
214.01	8,603	80.4%	3.9%	1.2%	33.3%
214.02	4,689	65.8%	14.8%	0.7%	37.1%
214.03	3,284	79.6%	3.5%	1.1%	44.1%
215.02	4,911	60.8%	10.9%	1.5%	52.4%
215.03	4,198	70.0%	8.5%	1.6%	40.9%
215.05	7,488	64.4%	15.1%	3.1%	37.6%
215.06	3,019	71.8%	10.5%	2.6%	34.1%

Source: 2010 Census SF-1 (P1)



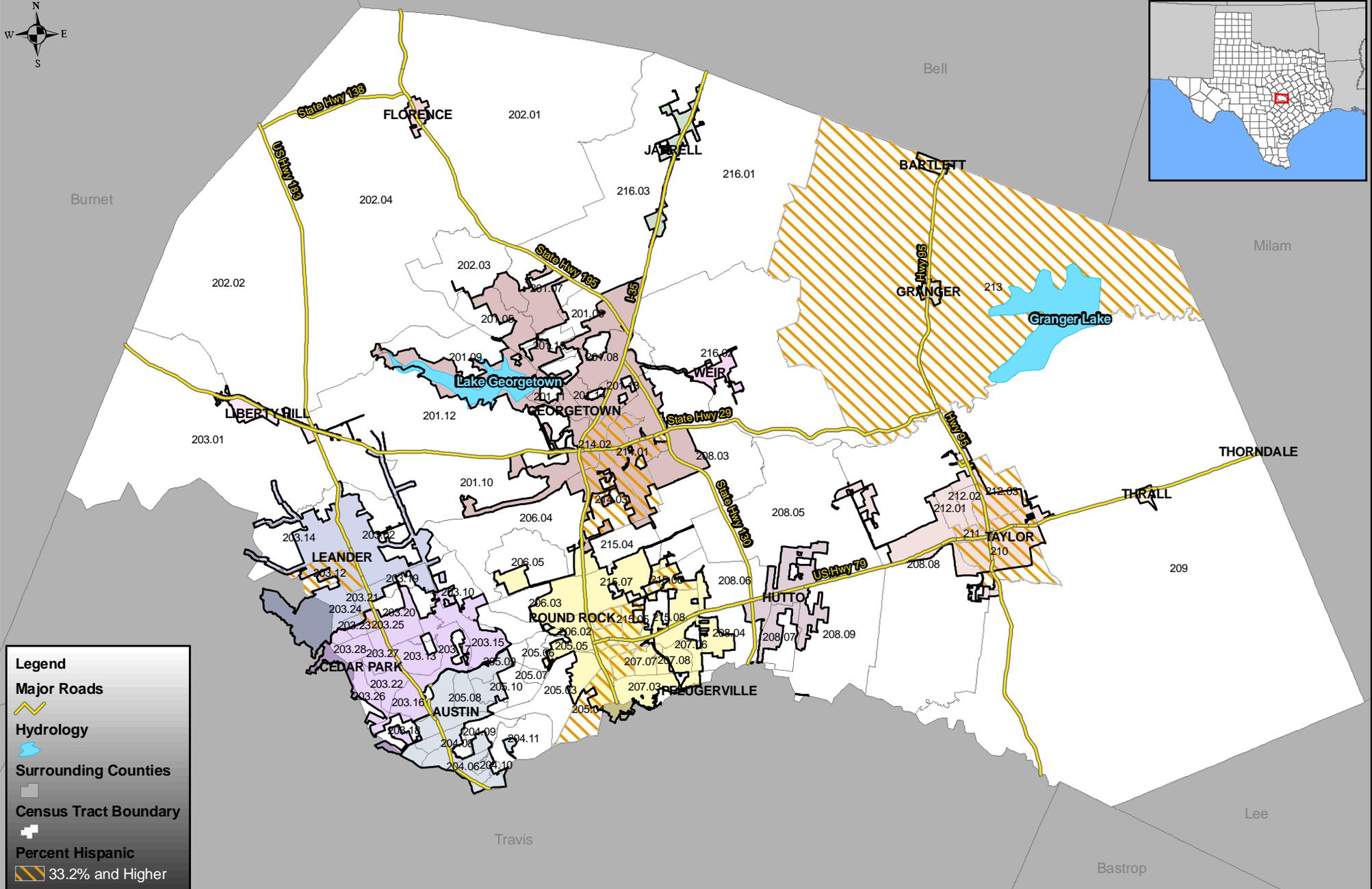
Map 1: Black Population Concentrations, 2010

Analysis of Impediments to Fair Housing Choice. Williamson County, TX



Map 3: Hispanic Population Concentrations, 2010

Analysis of Impediments to Fair Housing Choice. Williamson County, TX



Legend

- Major Roads
- Hydrology
- Surrounding Counties
- Census Tract Boundary
- Percent Hispanic
 - 33.2% and Higher

Source: 2010 Census

> Observation

There are 22 areas of minority concentration within Williamson County.

Concentrations of Black residents occur in the southern portion of the county in Round Rock and Taylor. Concentrations of Asian residents occur in the Austin City portion within the county, and concentrations of Hispanic residents can be found in the Round Rock and southern Georgetown areas.

iii. Residential Segregation Patterns

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and low-income minority inner-city neighborhoods. Latent factors, such as attitudes, or overt factors, such as real estate practices, can limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high.¹ Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.² The index is typically interpreted as the percentage of the minority population (in this instance, the Black population) that would have to move in order for a community or neighborhood to achieve full integration.

With a 2010 White-Black dissimilarity index of 31.9, Williamson County is moderately segregated. The data indicates that in order to achieve full integration among White and Black residents, 31.9% of Black residents would have to move to another census tract within the county.

¹ This aspect of segregation is related to the degree to which members of a group reside in areas where their group predominates, thus leading them to have less residential contact with other groups. See: Fossett, Mark. "Racial Segregation in America: A Nontechnical Review of Residential Segregation in Urban Areas." Department of Sociology and Racial and Ethnic Studies Institute, Texas A&M University, 2004.

² The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to $1/2 \sum ABS [(b/B)-(a/A)]$, where b is the subgroup population of a census tract, B is the total subgroup population in a city, a is the majority population of a census tract, and A is the total majority population in the city. ABS refers to the absolute value of the calculation that follows.

Figure 2-8
Williamson County Dissimilarity Indices, 2010

	DI with White Population	Population	Share of Total Population
White	-	330,191	78.1%
Black	31.9	26,196	6.2%
Other	31.5	29,336	6.9%
Asian/Pacific Islander	30.4	20,846	4.9%
American Indian	21.5	2,629	0.6%
Two or More Races	15.7	13,481	3.2%
Hispanic*	23.3	98,034	23.2%
Total	-	422,679	100.0%

* Hispanic ethnicity is counted independently of race.

Source: U.S. Census 2010 Data, Mullin & Lonergan Associates

In addition to a White/Black index of 31.9, the county has a White/Asian index of 30.4, a White/other-race index of 31.5, a White/multi-race index of 15.7 and a White/Hispanic index of 23.3. These numbers indicate that other subpopulations are more integrated than Whites and Blacks within the county, with the exception of persons listed as “all other races,” a category that tends to correlate with those reporting Hispanic ethnicity. Perfect integration would receive an index score of 0. Indices for the White/American Indian population received an index of 21.5. In cases where subgroup population is small, the dissimilarity index may be high even if the group’s members are evenly dispersed.

➤ Observation

The county is moderately segregated.

According to dissimilarity index data, 31.9% of Black persons would have to move to a different location in the county in order to achieve full Black-White integration.

Since 2000, the county’s Black and Hispanic populations have become more integrated, while its rapidly expanding Asian populations have experienced a relatively small increase in segregation. These trends are detailed in Figure 2-9 below.

Figure 2-9
Changes in Racial and Ethnic Integration, 2000-2010

	Black		Asian		Hispanic	
	Population	DI	Population	DI	Population	DI
2000	12,790	32.3	6,595	38.2	42,990	24.6
2010	26,196	31.9	20,433	40.8	98,034	23.3

Source: Census 2010 SF1, Census 2000, Mullin & Lonergan Associates



iv. Race/Ethnicity and Income

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan or apartment lease. Median household income (MHI) in Williamson County was \$65,140 in 2010. Williamson County consistently ranks in the top 100 highest median income counties across the United States.

Across racial and ethnic groups, Asians had the highest MHI at \$95,400. The MHI for White households was \$65,855. Among Black and Hispanic households, MHI was substantially less, at \$46,375 and \$52,512, respectively.

As suggested by the lower median incomes among Hispanics, minority residents in Williamson County experienced poverty at greater rates than White residents. More than 7% of White residents were living in poverty in 2010, compared with more than 13% of Hispanics. Poverty data for Asian and Black households was unavailable.

Figure 2-10

Median Household Income and Poverty Rates by Race/Ethnicity, 2010

	Median Household Income	Poverty Rate
Williamson County	\$65,140	8.1%
Whites	\$65,855	7.7%
Blacks	\$46,375	N/A
Asians	\$95,400	N/A
Hispanics	\$52,512	13.2%

Source: U.S. Census Bureau, 2010 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I, B17001, B17001A, B17001B, B17001D, B17001I)

Distribution of household income by race and ethnicity is comparable to the trends described above. A review of household income distribution also shows a disparity between White and non-White households in Williamson County. Among White and Asian residents in the county, more than half (51.4% and 52.4%, respectively) earned more than \$75,000 annually. By comparison, only 36.9% of Black households and 35.6% of Hispanic households earned at this level. Figure 2-11 illustrates these differences.

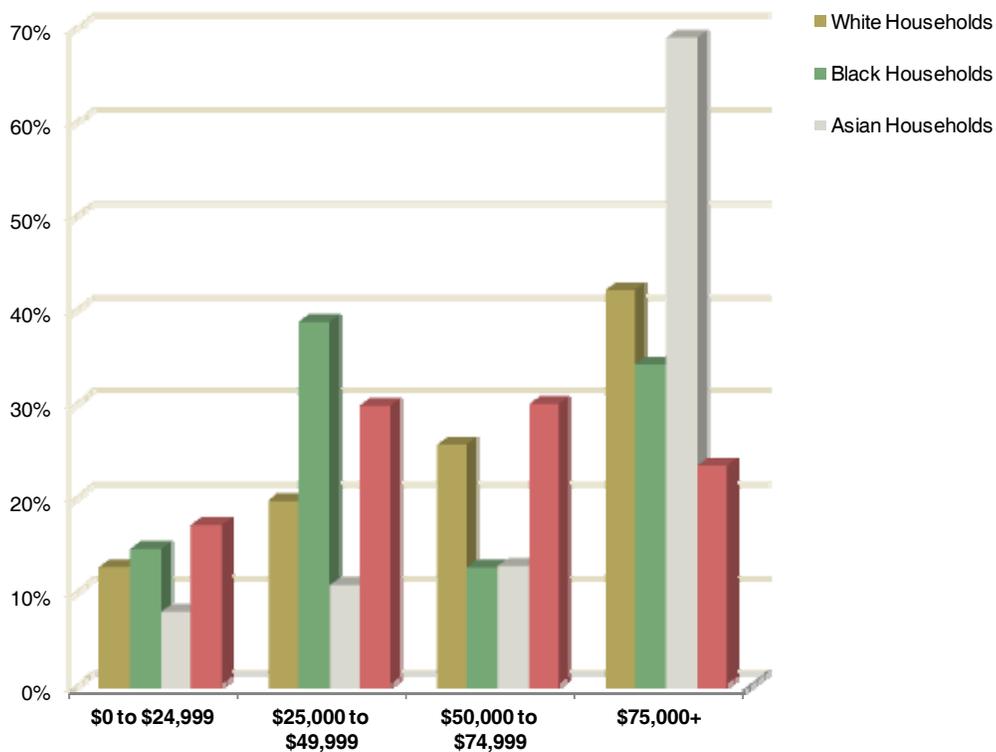


Figure 2-11
Household Income Distribution by Race and Ethnicity, 2010

	Total	\$0 to \$24,999	\$25,000 to \$49,999	\$50,000 to \$74,999	\$75,000 and higher
All Households	152,739	12.8%	20.7%	24.4%	42.0%
White Households	131,047	12.7%	19.6%	25.6%	42.1%
Black Households	8,684	14.6%	38.6%	12.7%	34.2%
Asian Households	6,315	7.8%	10.6%	12.8%	68.8%
Hispanic Households	27,359	17.1%	29.7%	29.8%	23.4%

Source: U.S. Census Bureau, 2010 American Community Survey (C19001, B19001A, B19001B, B19001D, B19001I).

Figure 2-12
Household Income Distribution by Race and Ethnicity, 2010



Observation

Hispanics experienced poverty at much higher rates than Whites in Williamson County in 2010.

Blacks had the lowest median household income, followed by Hispanic households. Hispanics also had poverty rates exceeding 13%, compared to 7.7% for Whites.

v. **Concentrations of LMI Persons**

The CDBG program includes a statutory requirement that at least 70% of funds invested benefit low and moderate income (LMI) persons. As a result, HUD provides the percentage of LMI persons in each census block group for entitlements such as Williamson County. Williamson County will invest its CDBG funds primarily in areas where the percentage of low and moderate income (LMI) persons is 47.74% or higher. Generally, the LMI percentage required for CDBG eligibility is 51%. However, due to a more affluent population in some areas of the county, HUD has established an “exception criteria” that lowers the LMI percentage requirement for Williamson County to 47.74%.

HUD 2010 LMI estimates reveal that 31 of the 133 census block groups across Williamson County had at least 47.74% of residents meeting the definition for LMI status.³ Of the 31 LMI block groups, 21 were found to be areas of racial or ethnic concentration. Areas of the county where LMI block groups and minority concentrations coincide are identified for the purposes of this report as impacted areas. It is within these lower-income, higher-minority areas that other demographic, economic and policy characteristics will be analyzed. The county’s impacted areas are identified in Figure 2-13. The following maps illustrate the location of LMI block groups and impacted areas.

Figure 2-13
Impacted Areas of Williamson County, 2010

Tract	Block Group	% LMI	Concentration
205.04	3	55.5%	38.6% Hispanic
207.01	1	61.2%	59.1% Hispanic
207.01	3	64.3%	59.1% Hispanic
207.04	3	47.4%	44.8% Hispanic
210	1	73.1%	18.4% Black, 63.4% Hispanic
210	2	72.7%	18.4% Black, 63.4% Hispanic
210	3	75.7%	18.4% Black, 63.4% Hispanic
211	1	68.3%	56.2% Hispanic
211	2	59.7%	56.2% Black
212.03	1	54.8%	36.8% Hispanic
213	1	65.1%	39.2% Hispanic
213	2	71.2%	39.2% Hispanic
213	3	67.5%	39.2% Hispanic
214.01	1	60.5%	33.3% Hispanic
214.02	1	71.6%	37.1% Hispanic
214.02	2	57.7%	37.1% Hispanic
214.02	3	76.6%	37.1% Hispanic
214.03	2	47.8%	44.1% Hispanic
215.02	2	58.5%	52.4% Hispanic
215.03	3	55.8%	40.9% Hispanic
215.03	4	62.6%	40.9% Hispanic

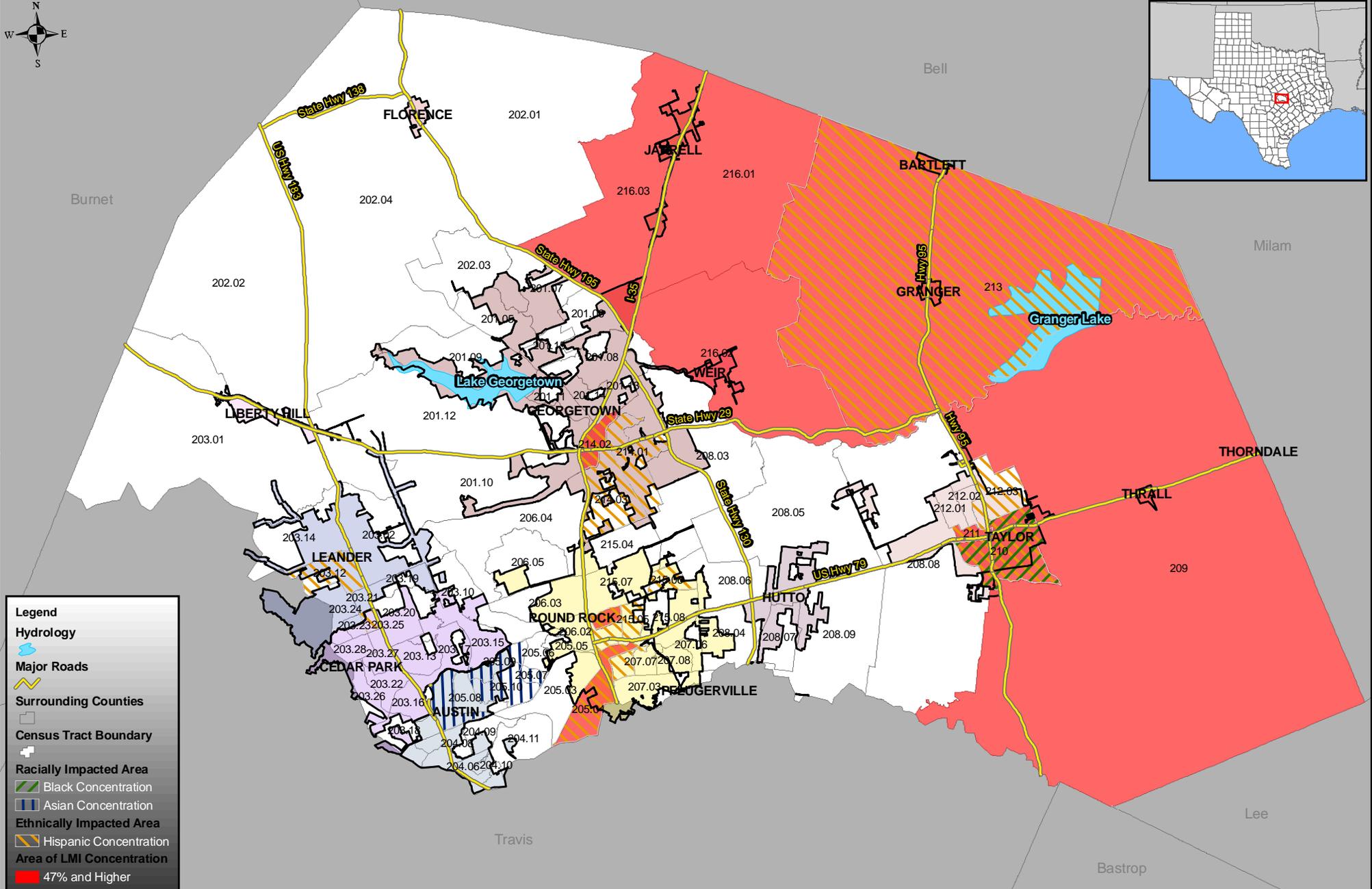
Source: U.S. Census 2010 Data, 2011 HUD LMI Estimates

³ This threshold is determined by HUD and represents the upper quartile of census block groups having the highest concentration of low and moderate income persons in the county.



Map 4: Areas of Concentration of LMI Residents, 2011

Analysis of Impediments to Fair Housing Choice. Williamson County, TX



Legend

- Hydrology**
 - Blue wavy lines: Major Roads
- Surrounding Counties**
 - Grey outline: Census Tract Boundary
- Racially Impacted Area**
 - Green diagonal lines: Black Concentration
 - Blue vertical lines: Asian Concentration
- Ethnically Impacted Area**
 - Orange diagonal lines: Hispanic Concentration
- Area of LMI Concentration**
 - Red solid fill: 47% and Higher

Source: 2010 Census

➤ Observation

Twenty-one areas of the county include concentrations of both LMI persons and minorities.

Within the Urban County, these impacted areas are located in Georgetown, Granger, Taylor, Pflugerville and south of Pflugerville. Additionally, impacted areas occur in the incorporated city of Round Rock.

vi. Disability and Income

As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental or emotional handicap, provided “reasonable accommodation” can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In the county, 9.7% of the population 5 years and older reported at least one type of disability in 2010.⁴

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. In the county, persons with disabilities were more than twice as likely as persons without disabilities to live in poverty. In 2010, 11.8% of persons with disabilities lived in poverty,⁵ compared to 7.6% of persons without disabilities who were living in poverty.

➤ Observation

Persons with disabilities were almost twice as likely to live in poverty as persons without disabilities.

Among county residents age five and older with a disability in 2010, 11.8% lived in poverty, compared to 7.6% of persons without disabilities.

⁴ U.S. Census Bureau, Census 2010 (B18101)

⁵ U.S. Census Bureau, Census 2010 (B18130)

vii. **Familial Status and Income**

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families and other families comprised of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Title VIII of the Civil Rights Act of 1968 protects against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

In the county, female-headed households grew from 9.2% of all households in 1990 to 12.2% in 2010, and female-headed households with children increased from 6.2% to 8.5%. Similarly, male-headed households with children increased from 1.6% to 2.1%. By comparison, married-couple family households with children declined from 37.8% to 29% during the same period. Single-person and non-family households comprise a growing share of the population, expanding from 22.9% in 1990 to 27.5% in 2010.

Figure 2-14
Female-headed Households and Households with Children, 1990-2010

	Total Households	% of Total	Family Households									Non-family Households
			Married-couple families			Female-headed Households			Male-headed Households			
			% of Total	With Children	Without Children	% of Total	With Children	Without Children	% of Total	With Children	Without Children	
1990	48,825	77.1%	64.9%	37.8%	27.0%	9.2%	6.2%	3.0%	3.0%	1.6%	1.4%	22.9%
2000	86,893	77.7%	65.5%	36.6%	28.8%	8.8%	5.9%	2.9%	3.5%	1.9%	1.6%	22.3%
2010	152,739	72.5%	56.4%	29.0%	27.4%	12.2%	8.5%	3.7%	3.9%	2.1%	1.8%	27.5%

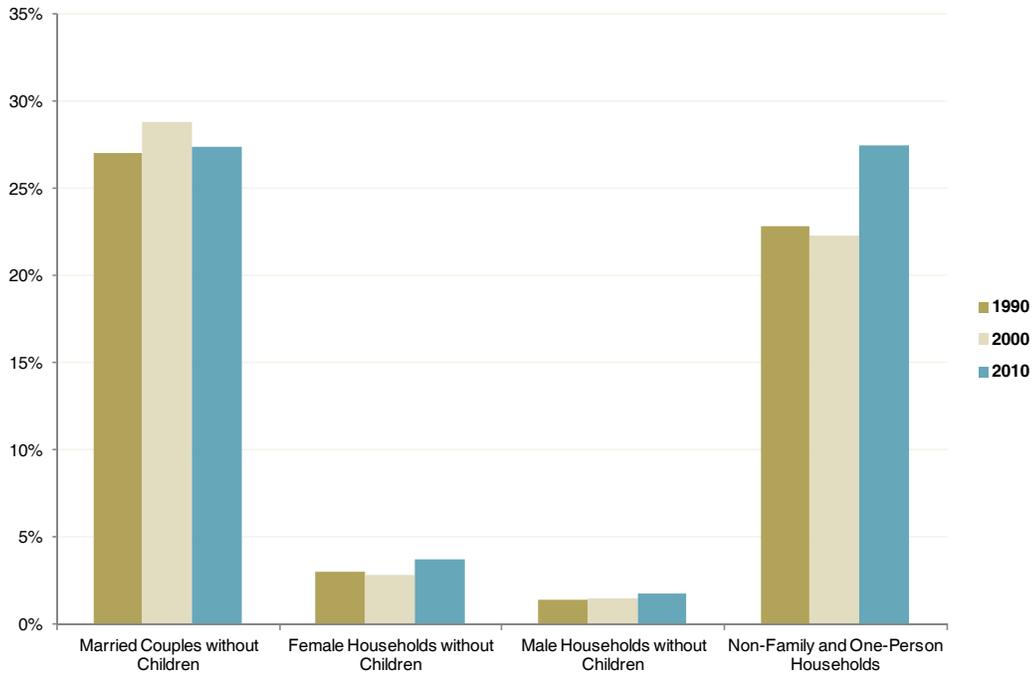
Source: U.S. Census Bureau, 1990 (STF-3, P019); Census 2000 (SF-3, P10); 2010 American Community Survey (B11001, B11003)

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower-incomes and the potential unwillingness of some landlords to rent their units to families with children. Although they comprised more than 12% of families in the county in 2010, female-headed households with children accounted for 59.6% of all families living in poverty.⁶ Among female-headed households with children, 29.4% were living in poverty, compared to 2.9% of married-couple families with children.

⁶ U.S. Census Bureau, Census 2010 (B17010)



Figure 2-15
Household Type and Presence of Children, 1990-2010



> Observation

Female-headed households with children accounted for almost 60% of all families living below the level of poverty in the county.

Female-headed households with children comprised 59.6% of all families living in poverty and were much more likely to live in poverty as married-couple families with children. Consequently, securing affordable housing may be especially difficult for this segment of the population.



viii. Ancestry and Income

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations reported that in 2009, 10.2% of all Williamson County residents were foreign-born.⁷ By way of origin, more than half of the county's foreign-born population (53%) came from Latin American nations, while 29.5% were from Asian countries and 10.8% were from European countries.

Williamson County's foreign-born population is statistically more likely to experience poverty. According to 2005-09 American Community Survey estimates, 10.1% of the foreign-born population for which poverty status is determined fell below the poverty line, compared to only 6.7% of all persons countywide for whom this status is determined.⁸

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak or understand English. HUD issued its guidelines on how to address the needs of persons with LEP in January 2007. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

American Community Survey (ACS) data reports on the non-English language spoken at home for the population five years and older. In 2010, the Census Bureau reported that 23,200 persons in Williamson County spoke English less than "very well."⁹ This limited English proficiency subpopulation constituted 6.8% of the county's population among persons age 5 and older. Only one language group, Spanish had more than 1,000 LEP persons. Spanish-speaking residents who spoke English less than "very well" constituted 75.9% of all speakers with limited English proficiency. To determine whether translation of vital documents would be required, a HUD entitlement community must first identify the number of LEP persons in a single language group who are likely to qualify for and be served by the county's programs.

⁷ U.S. Census Bureau, American Community Survey 2005-09 (B05006)

⁸ U.S. Census Bureau, American Community Survey 2005-09 (B06012)

⁹ U.S. Census Bureau, 2007-09 American Community Survey (B16001)



Figure 2-16
Limited English Proficiency Language Groups, 2010

Language Group	Number of LEP Speakers	Percentage of Population Age 5 and Up
Spanish	17,612	5.2%
Chinese	992	0.3%
Vietnamese	652	0.2%
Korean	537	0.2%

Source: American Community Survey 2010 Estimates (C16001)

> Observation

There is a sufficiently large number of limited-English Spanish speakers in Williamson County to warrant further analysis of their access to county programs and services.

In Williamson County, there are more than 17,612 speakers of Spanish who have limited proficiency in speaking English.

ix. Protected Class Status and Unemployment

In 2010, unemployment rates in Williamson County were slightly higher than in Texas. Women experienced unemployment at much lower rates than men, with 7% of women unemployed, compared to 10.7% of men. Black residents were substantially more likely to be unemployed than White residents, with unemployment rates of 11.5% and 8.6%, respectively. Asian residents had the highest unemployment rate at 11.8%. The Hispanic unemployment rate was lower than all of the other racial and ethnic groups reported, except for Whites.



Figure 2-17
Civilian Labor Force, 2010

Civilian Labor Force	Texas		Williamson County	
	Total	%	Total	%
Total CLF	12,363,612	100%	232,056	100.0%
Employed	11,271,851	94.1%	211,294	91.1%
Unemployed	1,091,761	8.8%	20,762	8.9%
Male CLF	6,675,976	54.0%	122,854	52.9%
Employed	6,076,377	94.0%	109,697	89.3%
Unemployed	599,599	9.0%	13,157	10.7%
Female CLF	5,687,636	46.0%	109,202	47.1%
Employed	5,195,474	94.2%	101,597	93.0%
Unemployed	492,162	8.7%	7,605	7.0%
White CLF	9,245,661	82.0%	195,297	84.2%
Employed	8,518,617	95.0%	178,583	91.4%
Unemployed	727,044	7.9%	16,714	8.6%
Black CLF	1,409,991	11.4%	14,250	6.1%
Employed	1,212,149	86.5%	12,610	88.5%
Unemployed	197,842	14.0%	1,640	11.5%
Asian CLF	504,741	4.1%	10,570	4.6%
Employed	467,122	94.8%	9,321	88.2%
Unemployed	37,619	7.5%	1,249	11.8%
Hispanic CLF	4,302,385	34.8%	52,021	22.4%
Employed	3,893,612	90.0%	46,971	90.3%
Unemployed	408,773	9.5%	5,050	9.7%

(C23001, C23002A, C23002B, C23002D, C23002I). State: Same tables, 2010 ACS.

➤ Observation

Asians and Blacks were substantially more likely than Whites to be unemployed in the county in 2010.

Nearly 12% of Asians and 13% of Blacks were unemployed in 2010, compared to 8.6% of Whites. Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses.



B. Housing Market

i. Housing Inventory

The housing stock in the county increased by 42,296 units, or 46.8%, between 2000 and 2009.

Figure 2-18 and the following map illustrate the census tracts and the change in the housing inventory that has occurred since 2000. Census tracts located in the communities of Cedar Park, Hutto and Round Rock experienced the greatest increase in the number of units.

Figure 2-18

Trends in Total Housing Units by Census Tract, 2000-2009

Census Tract	2000	2009	Change	Census Tract	2000	2009	Change
Williamson County	85,947	124,293	44.6%	Williamson County	90,325	132,621	46.8%
201.01	3,887	7,015	80.5%	205.04	1,925	2,925	51.9%
201.02	2,470	2,780	12.6%	206.01	2,453	5,403	120.3%
201.03	1,893	2,281	20.5%	206.02	1,690	1,783	5.5%
201.04	1,555	2,014	29.5%	207.01	892	777	-12.9%
202	2,856	4,104	43.7%	207.03	2,672	3,596	34.6%
203.01	1,150	1,275	10.9%	207.04	1,987	2,019	1.6%
203.02	809	1,047	29.4%	207.05	2,043	4,516	121.0%
203.03	1,312	3,287	150.5%	208.01	2,371	6,997	195.1%
203.05	1,290	3,278	154.1%	208.02	1,519	2,598	71.0%
203.06	3,231	4,840	49.8%	209	1,640	1,541	-6.0%
203.07	3,706	6,130	65.4%	210.00	1,135	1,154	1.7%
203.08	3,042	3,846	26.4%	211	1,082	1,175	8.6%
203.09	2,589	8,359	222.9%	212.01	827	1,156	39.8%
203.10	912	851	-6.7%	212.02	946	1,329	40.5%
204.02	2,680	2,701	0.8%	212.03	1,025	1,113	8.6%
204.03	637	499	-21.7%	213	1,438	1,236	-14.0%
204.04	1,349	1,132	-16.1%	214.01	1,371	2,422	76.7%
204.05	2,352	1,836	-21.9%	214.02	1,222	1,542	26.2%
204.06	2,161	2,320	7.4%	214.03	829	1,199	44.6%
204.07	4,289	3,898	-9.1%	215.01	3,879	8,275	113.3%
205.01	3,030	3,997	31.9%	215.02	1,479	1,620	9.5%
205.02	3,067	5,310	73.1%	215.03	1,792	1,680	-6.3%
205.03	1,656	1,788	8.0%	216.00	2,185	1,977	-9.5%

Source: 2000 Census (H1), 2005-2009 ACS Data (B25024)



Observation

The greatest gain in housing units since 2000 has occurred in the county's southern and central areas. This includes the communities of Cedar Park, Hutto, Round Rock and Georgetown.



Map 6: Change in Total Housing Units, 1990 - 2010

Analysis of Impediments to Fair Housing Choice. Williamson County, TX



Source: HUD 2009 LMI data and 2010 U.S. Census

ii. Types of Housing Units

In 2009, single-family units comprised 79.4% of the housing stock in the county, and multi-family units comprised 17.1%. Mobile homes accounted for most of the remaining 3.0%. In 13 census tracts, multi-family units comprised more than one-fourth of the housing stock. See Figure 2-19 below.

Figure 2-19
Trends in Housing Units in Structures by Census Tract, 2009

Census Tract	Total Units	Single-family units	Multi-family units				Mobile home	Boat, RV, van, etc.	
			2 to 4	5 to 9	10 to 19	20 or more			
Williamson County	132,621	105,428	5,826	3,865	5,634	7,411	22,736	4,020	59
201.01	7,015	6,957	12	0	0	0	12	46	0
201.02	2,780	1,675	474	166	152	313	1,105	0	0
201.03	2,281	1,943	103	0	35	68	206	132	0
201.04	2,014	1,901	78	0	35	0	113	0	0
202	4,104	3,060	94	0	22	0	116	925	3
203.01	1,275	986	11	7	0	0	18	257	14
203.02	1,047	944	14	0	0	0	14	89	0
203.03	3,287	3,009	0	0	17	0	17	261	0
203.05	3,278	3,062	49	26	33	27	135	81	0
203.06	4,840	4,067	55	38	0	264	357	416	0
203.07	6,130	5,063	172	486	198	211	1,067	0	0
203.08	3,846	3,015	129	134	233	315	811	20	0
203.09	8,359	7,062	53	131	400	559	1,143	154	0
203.10	851	851	0	0	0	0	0	0	0
204.02	2,701	1,765	333	92	149	362	936	0	0
204.03	499	240	185	28	21	18	252	7	0
204.04	1,132	1,122	10	0	0	0	10	0	0
204.05	1,836	936	86	232	318	264	900	0	0
204.06	2,320	427	325	472	557	529	1,883	10	0
204.07	3,898	2,769	137	170	486	324	1,117	12	0
205.01	3,997	3,602	0	214	166	15	395	0	0
205.02	5,310	4,037	119	87	555	482	1,243	30	0
205.03	1,788	1,504	191	0	0	56	247	37	0
205.04	2,925	1,127	156	251	294	999	1,700	98	0
206.01	5,403	5,175	52	109	29	38	228	0	0
206.02	1,783	1,648	78	34	0	0	112	23	0
207.01	777	511	39	143	62	22	266	0	0
207.03	3,596	2,199	226	144	529	483	1,382	15	0
207.04	2,019	1,435	212	104	134	134	584	0	0
207.05	4,516	3,962	50	21	160	323	554	0	0
208.01	6,997	6,309	73	0	0	14	87	559	42
208.02	2,598	2,491	64	33	0	0	97	0	0
209	1,541	1,272	3	2	0	0	5	0	0
210.00	1,154	958	85	0	7	0	92	0	0
211	1,175	1,059	116	0	0	0	116	0	0
212.01	1,156	1,118	0	4	0	0	4	34	0
212.02	1,329	1,137	140	25	0	15	180	12	0
212.03	1,113	913	130	38	0	23	191	9	0
213	1,236	1,083	56	0	0	3	59	94	0
214.01	2,422	2,119	295	0	0	8	303	0	0
214.02	1,542	720	191	106	311	187	795	27	0
214.03	1,199	883	149	112	14	7	282	34	0
215.01	8,275	6,524	258	184	367	942	1,751	0	0
215.02	1,620	950	551	0	81	38	670	0	0
215.03	1,680	565	239	272	236	368	1,115	0	0
216.00	1,977	1,273	33	0	33	0	66	638	0

Source: U.S. Census Bureau, 2009 ACS (B25024)



In 2009, the Census reported that the county's total housing inventory of 132,621 was 68.6% owner-occupied and 24.8% renter-occupied. Over 96% of the housing units consist of single-family, owner-occupied units. By comparison, there were only 380 units of multi-family, owner-occupied units in the county.

The majority of the multi-family units are located in census tracts located in the more populated areas of the county, including Austin, Cedar Park, Round Rock, and Georgetown. Figure 2-20 contains details on owner-occupied and renter-occupied units by structure type for census tracts across Williamson County.



Figure 2-20
Housing Units by Tenure and Structure Type, 2009

Census Tract	Owner-Occupied				Renter-Occupied				% Renter-Occupied Multi-Family
	Total	Single-Family	Multi-Family	% Multi-Family	Total	Single-Family	Multi-Family	% Multi-Family	
Williamson County	91,053	87,529	380	0.4%	32,979	12,324	19,781	60.0%	16.3%
201.01	6,434	6,376	12	0.2%	202	202	0	0.0%	0.2%
201.02	1,328	1,296	32	2.4%	1,235	335	900	72.9%	36.4%
201.03	1,893	1,811	0	0.0%	338	82	206	60.9%	9.2%
201.04	1,764	1,744	20	1.1%	147	54	93	63.3%	5.9%
202.00	3,254	2,597	0	0.0%	280	101	75	26.8%	2.1%
203.01	958	741	0	0.0%	182	126	18	9.9%	1.6%
203.02	889	804	14	1.6%	117	99	0	0.0%	1.4%
203.03	2,336	2,142	0	0.0%	743	714	17	2.3%	0.6%
203.05	2,794	2,713	0	0.0%	402	267	135	33.6%	4.2%
203.06	3,634	3,342	0	0.0%	917	495	298	32.5%	6.5%
203.07	4,618	4,605	13	0.3%	1,329	388	941	70.8%	16.0%
203.08	2,784	2,753	11	0.4%	981	262	719	73.3%	19.4%
203.09	6,160	6,096	0	0.0%	1,834	756	1,027	56.0%	12.8%
203.10	734	734	0	0.0%	117	117	0	0.0%	0.0%
204.02	1,532	1,524	8	0.5%	1,061	241	820	77.3%	31.9%
204.03	241	234	0	0.0%	240	6	234	97.5%	48.6%
204.04	870	860	10	1.1%	242	242	0	0.0%	0.9%
204.05	733	723	10	1.4%	975	174	801	82.2%	47.5%
204.06	336	269	57	17.0%	1,791	108	1,683	94.0%	81.8%
204.07	2,457	2,384	61	2.5%	1,273	279	994	78.1%	28.3%
205.01	3,136	3,136	0	0.0%	728	390	338	46.4%	8.7%
205.02	3,669	3,659	0	0.0%	1,367	274	1,073	78.5%	21.3%
205.03	1,397	1,304	56	4.0%	273	111	162	59.3%	13.1%
205.04	924	839	0	0.0%	1,862	273	1,576	84.6%	56.6%
206.01	4,675	4,675	0	0.0%	427	221	206	48.2%	4.0%
206.02	1,166	1,143	0	0.0%	473	361	112	23.7%	6.8%
207.01	325	319	6	1.8%	371	151	220	59.3%	32.5%
207.03	1,766	1,766	0	0.0%	1,484	363	1,106	74.5%	34.0%
207.04	1,027	1,027	0	0.0%	808	312	496	61.4%	27.0%
207.05	3,255	3,255	0	0.0%	911	442	469	51.5%	11.3%
208.01	5,296	4,786	3	0.1%	1,232	1,054	84	6.8%	1.3%
208.02	2,193	2,193	0	0.0%	270	179	91	33.7%	3.7%
209.00	1,116	942	0	0.0%	204	156	5	2.5%	0.4%
210.00	621	562	0	0.0%	359	259	78	21.7%	8.0%
211.00	597	597	0	0.0%	422	306	116	27.5%	11.4%
212.01	960	926	0	0.0%	62	58	4	6.5%	0.4%
212.02	795	795	0	0.0%	327	135	180	55.0%	16.0%
212.03	715	715	0	0.0%	290	110	171	59.0%	17.0%
213.00	848	786	0	0.0%	238	160	54	22.7%	5.0%
214.01	1,760	1,760	0	0.0%	541	289	252	46.6%	11.0%
214.02	501	484	0	0.0%	913	183	720	78.9%	50.9%
214.03	684	648	16	2.3%	384	132	238	62.0%	23.8%
215.01	5,384	5,384	0	0.0%	2,384	833	1,551	65.1%	20.0%
215.02	666	626	40	6.0%	791	255	536	67.8%	39.5%
215.03	522	522	0	0.0%	970	43	927	95.6%	62.1%
216.00	1,306	932	11	0.8%	482	226	55	11.4%	3.7%

Source: U.S. Census Bureau, Census 2009 ACS (B25032)



The following map illustrates the distribution of multi-family units across Williamson County, indicating the extent to which they are located with much greater density in the central and southern portions of the county. This is likely due in large part to the population growth that has occurred in the communities north of Austin, including Cedar Park and Round Rock.

➤ Observation

Renter-occupied multi-family housing units represented only 16.3% of the occupied housing units in the county in 2009. Almost half of the census tracts in the county had fewer than 10% that were rent-occupied multi-family units.

Without an adequate supply of affordable multi-family rental housing units in non-impacted areas, housing choice for lower-income households is greatly restricted.

iii. Protected Class Status and Home Ownership

The value in home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."¹⁰

Historically, minorities tend to have lower home ownership rates than Whites. In 2009 in the county, Whites had a home ownership rate of 75.3%. By comparison, Blacks owned their homes at a rate of 57.8% and Hispanics, 63.3%. Asians had a home ownership rate of 63.3%, the second highest of any race or ethnic group.

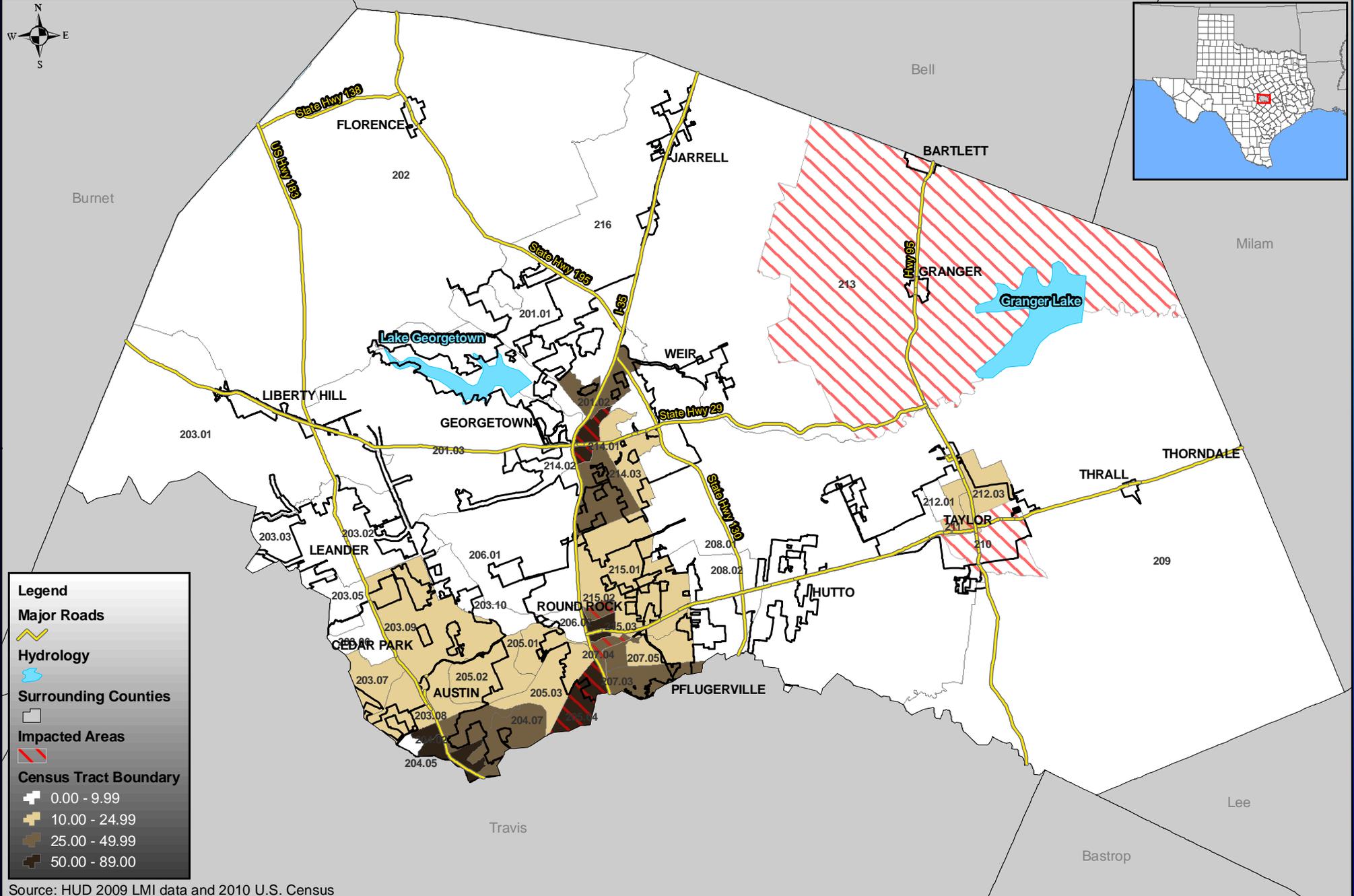
Minority home ownership by census tract widely varied, as illustrated in Figure 2-21. Many census tracts with fewer than 50 minority households reported home ownership rates of 100%. For example, 100% of the 37 Asian households in census tract 203.06, in Cedar Park, owned their homes.

As previously noted, median incomes for Hispanics and Blacks are significantly lower than those of Whites. This is one among several factors that contribute to the generally lower rates of homeowners for minorities across the county.

¹⁰ Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in *Segregation: The Rising Costs for America*, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.

Map 8: Multi Family Units as Percentage of Occupied Units, 2009

Analysis of Impediments to Fair Housing Choice. Williamson County, TX



Source: HUD 2009 LMI data and 2010 U.S. Census

Figure 2-21
Housing Tenure by Race and Ethnicity, 2009

	White		Black		Asian		Hispanic	
	HHs	% Owners	HHs	% Owners	HHs	% Owners	HHs	% Owners
Williamson County	104,080	75.3%	6,971	57.8%	4,326	69.3%	19,387	63.3%
201.01	6,465	96.9%	20	100.0%	19	100.0%	156	100.0%
201.02	2,295	50.9%	58	79.3%	68	45.6%	387	48.6%
201.03	2,139	85.2%	47	53.2%	11	100.0%	89	70.8%
201.04	1,759	91.6%	17	100.0%	0	-	177	80.8%
202.00	3,348	93.0%	29	100.0%	0	-	260	70.0%
203.01	1,056	84.7%	0	-	26	100.0%	84	84.5%
203.02	900	90.7%	0	-	0	-	178	74.2%
203.03	2,525	74.8%	214	100.0%	37	54.1%	771	75.2%
203.05	2,680	88.2%	164	100.0%	99	66.7%	410	75.1%
203.06	3,736	82.7%	203	80.3%	37	100.0%	926	69.3%
203.07	4,994	78.7%	146	43.2%	233	100.0%	835	62.0%
203.08	3,299	76.4%	105	45.7%	185	63.2%	340	79.1%
203.09	6,759	78.2%	308	60.4%	306	84.0%	1,038	78.2%
203.10	803	87.0%	9	100.0%	18	100.0%	21	38.1%
204.02	2,207	63.2%	214	21.5%	46	65.2%	339	40.1%
204.03	418	54.3%	0	-	28	0.0%	56	48.2%
204.04	997	77.2%	6	100.0%	12	100.0%	143	78.3%
204.05	1,303	47.7%	160	11.9%	51	23.5%	249	18.9%
204.06	1,855	16.7%	93	-	108	23.1%	130	1.1%
204.07	2,866	68.4%	166	27.1%	503	64.2%	439	57.4%
205.01	3,183	82.5%	166	54.2%	322	79.5%	269	72.5%
205.02	3,944	74.4%	280	53.2%	618	83.2%	487	60.0%
205.03	1,522	86.7%	43	30.2%	19	57.9%	156	50.6%
205.04	2,048	36.8%	243	14.8%	244	18.4%	747	50.2%
206.01	4,226	94.8%	173	93.6%	328	75.3%	599	73.5%
206.02	1,398	71.7%	93	37.6%	20	45.0%	380	64.2%
207.01	539	55.8%	80	10.0%	0	-	247	40.9%
207.03	2,376	54.7%	376	64.9%	135	23.0%	912	48.0%
207.04	1,562	56.7%	134	52.2%	8	-	441	53.0%
207.05	3,357	78.1%	330	77.2%	220	87.7%	780	71.0%
208.01	5,314	82.2%	700	68.7%	12	100.0%	1,288	85.5%
208.02	2,129	90.0%	155	79.3%	114	86.8%	228	81.1%
209.00	1,250	84.2%	36	94.4%	8	100.0%	87	90.8%
210.00	591	59.1%	232	70.7%	7	0.0%	545	55.0%
211.00	839	58.5%	27	18.5%	38	100.0%	355	46.2%
212.01	969	93.6%	22	100.0%	0	-	142	92.3%
212.02	964	75.2%	70	64.3%	13	100.0%	238	52.1%
212.03	849	75.5%	76	80.3%	0	-	215	50.2%
213.00	953	80.6%	91	56.0%	7	100.0%	189	76.2%
214.01	1,961	79.8%	48	18.8%	44	100.0%	522	66.3%
214.02	1,099	29.7%	186	68.8%	0	-	358	35.2%
214.03	847	67.8%	74	41.9%	21	52.4%	396	48.2%
215.01	5,863	68.7%	1,004	65.7%	286	72.0%	1,542	71.3%
215.02	1,053	48.2%	184	30.4%	38	0.0%	479	48.9%
215.03	1,138	42.4%	189	1.1%	20	10.0%	392	27.0%
216.00	1,702	73.7%	0	-	17	100.0%	365	61.1%

Source: 2005-09 American Community Survey (B25003A, B25003B, B25003D, B25003I)



> Observation

Lower household incomes among Blacks and Hispanics are reflected in lower home ownership rates when compared to Whites and Asians.

Among minorities in the county, 53.5% of Blacks and 52.4% of Hispanics were home owners, compared to 78.6% of Whites and 60.7% of Asians.

iv. **The Tendency of the Protected Classes to Live in Larger Households**

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

In Williamson County, minorities were more likely than Whites to live in families with three or more people. In 2010, 59.5% of White families had three or more people. By comparison, 70.3% of Black families and 75.7% of Asian families were considered large. Hispanic families had the highest percent at 78%.

Figure 2-22

Families with Three or More Persons, 2010

	Percent of Families with Three or More Persons
White	59.5%
Black	70.3%
Asian	75.7%
Hispanic	78.0%
Total	62.5%

Source: U.S. Census Bureau, Census 2010 ACS (P28, P28A, P28B, P28D, P28H)

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. In Williamson County, there are fewer options to rent a unit to accommodate large families. Of the 47,152 rental units in 2009, only 39.1% had three or more bedrooms, compared to 90.6% of the owner housing stock.

Figure 2-23
Housing Units by Number of Bedrooms, 2010

	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	# units	% of all units	# units	% of all units
Williamson County				
0-1 bedroom	12,398	26.3%	706	0.7%
2 bedrooms	16,302	34.6%	8,765	8.7%
3 or more bedrooms	18,457	39.1%	91,607	90.6%
Total	47,152	100.0%	101,078	100.0%

Source: 2010 American Community Survey (B25042)

Observation

A lack of larger rental units consisting of three or more bedrooms has a disproportionately greater impact on minority families, who tend to live in larger families and are more likely to be renters.

An inadequate inventory of larger rental units restricts the choice of adequate housing for larger minority families.

v. Cost of Housing

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods because of a lack of affordable housing in those areas.

Between 1990 and 2010, median housing value (in inflation-adjusted dollars) increased 45.6% across Williamson County, while real median income increased only 15.9%. Median gross rent increased 35.3% between 1990 and 2000, but declined in 2010 for an overall increase of 31.6% over rent in 1990. The increase in median housing value paired with a decline in real income means that buying a house is relatively more expensive for individuals and families.

Figure 2-24
Trends in Housing Value, Rent and Income, 1990-2010

	Median Housing Value (in 2010 \$)	Median Gross Rent (in 2010 \$)	Median Household Income (in 2010 \$)
1990	\$ 120,290	\$ 737	\$ 56,216
2000	\$ 159,300	\$ 997	\$ 76,791
2010	\$ 175,100	\$ 970	\$ 65,140
Change	45.6%	31.6%	15.9%

Sources: U.S. Census Bureau, 1990 Census (STF3-H061A, H043A, P080A), Census 2000 (SF3-H76, H63, P53), 2010 American Community Survey (B25077, B25064, B19013); Calculations by Mullin & Lonergan Associates, Inc.



Observation

Between 1990 and 2010, real median housing value increased 45.6% in the county while real household income grew only 15.9%. The result of this gap is a decline in the number of individuals and families that can afford to purchase a home.

a. Rental Housing

In sample data collected from 2008 to 2010, a total of 45,695 renter households paid cash for their housing units. Figure 2-25 lists the breakdown of rental units by gross rent. With a median household income of \$65,855, White households would have had many more affordable rental housing options than Black or Hispanic households. At this median income level, approximately 88.9% of the rental housing stock would have been affordable to White households earning the median income, as depicted in Figure 2-26. Asian households earning the median household income of \$95,400 had even more affordable housing options, as 30% of this monthly income level would provide for an affordable monthly rent up to \$2,385.

Black households earning the median household income of \$46,375 and Hispanic households earning the median household income of \$52,512 have fewer affordable housing options, as these income levels would make affordable 54% and 76.3%, respectively, of the rental housing stock.

It is worth noting that this analysis does not address the availability of rental housing units at these price ranges, but only the affordability of the existing rental housing stock based on the amount of actual rent paid by tenant households.

Figure 2-25
Renter-Occupied Units by Gross Rent Paid, 2008-2010

Monthly Gross Rent	Units
Less than \$100	37
\$100 to \$199	83
\$200 to 299	443
\$300 to 399	271
\$400 to \$499	479
\$500 to \$599	1,435
\$600 to \$699	3,403
\$700 to \$799	5,267
\$800 to \$899	6,679
\$900 to \$999	6,583
\$1,000 to \$1,249	10,191
\$1,250 to \$1,499	5,748
\$1,500 to 1,999	4,015
\$2,000 or more	1,061
Total	45,695

Source: U.S. Census Bureau, 2008-2010 American Community Survey (B25063)

The number of affordable rental units in the county declined between 2000 and 2010. The number of units renting for less than \$500 fell almost 40%. During the same time, the number of units renting for more than \$1,000 per month increased from 4,861 to 23,333, or 380%.

Figure 2-26
Loss of Affordable Rental Housing Units, 2000-2010

Units Renting for:	2000	2010	Change	
			#	%
Less than \$500	2,747	1,656	-1,091	-39.7%
\$500 to \$699	5,004	5,640	636	12.7%
\$700 to \$999	8,574	20,045	11,471	133.8%
\$1,000 or more	4,861	23,333	18,472	380.0%

Sources: U.S. Census Bureau, Census 2000 (SF3, H62), 2005-09 American Community Survey (B25063)

➤ Observation

The county lost almost a third of its units renting for less than \$500 between 2000 and 2010. By comparison, there was a substantial increase in the number of units renting for more than \$1,000.

The loss of units renting for less than \$500 in the county severely restricts housing choice for minorities, who have significantly lower incomes than Whites, and who are more likely to be renters.

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in counties and cities in the U.S. for 2011. In Williamson County, the FMR for a two-bedroom apartment is \$963. In order to afford this level of rent and utilities without paying more than 30% of income on housing, a household must earn \$3,210 monthly or \$38,520 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$18.52.

In Williamson County, a minimum-wage worker earns an hourly wage of \$7.25. In order to afford the FMR for a two-bedroom apartment, a minimum-wage earner must work 102 hours per week, 52 weeks per year. Or, a household must include 1.4 minimum-wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable

➤ Observation

Minimum-wage and single-income households cannot afford a two-bedroom housing unit renting for the HUD fair market rent in Williamson County.

Individuals and households with incomes insufficient to afford prevailing market rents commonly double-up with others or lease inexpensive, potentially substandard units. The lower incomes of minorities and female-headed households expose these household types disproportionately to the problem.

Monthly Supplemental Security Income (SSI) payments for an individual are \$674 in Williamson County and across Texas. If SSI represents an individual's sole source of income, \$202 in monthly rent is affordable, while the FMR for a one-bedroom is \$791.

➤ Observation

Persons with disabilities receiving a monthly SSI check for \$674 as their sole source of income cannot afford a one-bedroom unit renting at the fair market rate of \$791 in Williamson County.

b. Sales Housing

One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level. It is possible also to determine the affordability of the housing market for each racial or ethnic group in the County. To determine affordability (i.e., how much mortgage a household could afford), the following assumptions were made:

- The mortgage was a 30-year fixed rate loan at a 5.0% interest rate,
- The buyer made a 10% down payment on the sales price,
- Principal, interest, taxes and insurance (PITI) equaled no more than 30% of gross monthly income,
- Property taxes were levied at the County's median tax rate of 2.44 mills,¹¹ and
- There was no additional consumer debt (credit cards, etc).

Figure 2-27 details the estimated *maximum* affordable sales prices and monthly PITI payments for Whites, Blacks, Asians and Hispanics in Williamson County.

In Williamson County, the 2010 median sales price for single-family homes was \$171,000. The Countywide median household income in 2010 was \$65,140, which translates to a maximum affordable home purchase price of \$232,050. The fact that the median income in Williamson County allows a household to afford a home beyond the median sales price suggests that the County is an inherently affordable market, though the affordability of housing varies greatly among areas within the County.

The maximum affordable home purchase prices for Whites and Asians was substantially higher than the affordable home prices for Black and Hispanic homebuyers. The maximum affordable purchase price at the median household income for Blacks was below the median sales price.

Figure 2-27
Maximum Affordable Purchase Price by Race/Ethnicity, 2009

	Median Household Income	Monthly Mortgage Payment			Total PITI Payment	Maximum Affordable Purchase Price
		Mortgage Principal & Interest	Real Estate Taxes	Homeowner's Insurance & PMI		
Williamson County	\$65,140	\$1,121	\$427	\$80	\$1,628	\$232,050
Whites	\$65,855	\$1,134	\$432	\$80	\$1,646	\$234,725
Blacks	\$46,375	\$781	\$298	\$80	\$1,159	\$161,750
Asians	\$95,400	\$1,669	\$636	\$80	\$2,385	\$345,400
Hispanics	\$52,512	\$893	\$340	\$80	\$1,313	\$184,750
2010 Median Sales Price for Single-Family Home: \$171,000						

Sources: 2010 Census, Austin MLS, Williamson County CAD, Calculations by Mullin & Lonergan Associates, Inc.

¹¹ Median was derived from the combined county/municipal/school millage rates for each municipality in Williamson County.



> Observation

Lower median incomes for Black and Hispanic households in Williamson County translate to a substantially diminished range of home purchase options for these minority groups.

Williamson County represents a generally affordable housing market, in comparison of median incomes and home sales prices. However, the maximum home purchase price for Black households fell below the median home sales price in 2010, indicating that the lower median income for this group limits the housing options available.

Multiple Listing Service data on all home sales in Williamson County during the last three years provides further insight on the local housing market. Sales figures from 2009 through September 2011 do not reflect the market correction that is characteristic of many other areas of the country during the same range of time, as Williamson County did not experience a large inflation of values in the early 2000s and did not, as a result, experience a precipitous housing market crash. The median sales price of single-family homes held steady from January 2009 to September 2011, shifting annually from \$173,000 to \$171,000 and \$172,000. The average price of homes sold has held equally stable, from \$193,980 in 2009 to \$194,532 in 2010 and \$193,192 in 2011. The difference between the average and median sales prices indicates a relatively small number of high-value outliers.

The distribution of sales by community for each year appears in Figure 2-28. Georgetown stands out as the area with consistent highest-value sales, with an average price of \$220,651 in 2010, the latest full year of data. Florence, Hutto, Jarell, Taylor and Thrall appear more affordable, with average prices ranging between \$55,322 and \$134,689.

Figure 2-28
Housing Sales by Community, 2009-2011

	2009		2010		2011*	
	Units Sold	Average Price	Units Sold	Average Price	Units Sold	Average Price
Austin	838	\$ 202,473	802	\$206,417	578	\$212,946
Bartlett	1	\$ 69,000	7	\$68,025	3	\$126,667
Cedar Park	1,009	\$ 202,141	966	\$205,522	699	\$211,219
Coupland	1	\$ 204,000	6	\$83,067	3	\$160,500
Elgin	2	\$ 155,250	3	\$138,667	0	-
Florence	20	\$ 161,846	20	\$193,783	16	\$94,325
Georgetown	972	\$ 227,662	1,009	\$220,651	768	\$219,775
Granger	9	\$ 111,357	19	\$153,753	10	\$152,090
Hutto	446	\$ 145,588	433	\$134,689	297	\$127,909
Jarrell	64	\$ 110,707	42	\$114,725	42	\$121,478
Leander	680	\$ 169,954	659	\$170,676	438	\$157,921
Liberty Hill	120	\$ 223,871	125	\$219,867	79	\$213,831
Round Rock	1,948	\$ 197,945	1,712	\$201,968	1,255	\$197,261
Taylor	157	\$ 106,681	151	\$103,725	106	\$95,188
Thorndale	0	-	0	-	1	\$475,000
Thrall	13	\$ 126,539	9	\$55,322	13	\$121,958
Walburg	1	\$ 205,000	1	\$256,000	0	-
TOTAL	6,281	\$ 193,980	5,964	\$194,532	4,308	\$193,192

* Through September only

Source: Austin Multi-List Service

Sales data can also describe housing demand by structure type. Across Williamson County in the three years of sales studied, homes with three bedrooms were the most commonly sold, followed by homes with four bedrooms. In 2011, these two configurations comprised 85% of all homes sold.

Figure 2-29
Housing Sales by Number of Bedrooms, 2009-2011

Number of Bedrooms	2009		2010		2011	
	#	%	#	%	#	%
0	2	0.0%	2	0.0%	1	0.0%
1	13	0.2%	11	0.2%	9	0.2%
2	418	6.7%	486	8.1%	290	6.7%
3	3,135	49.9%	2,893	48.5%	2,061	47.8%
4	2,315	36.9%	2,152	36.1%	1,602	37.2%
5	360	5.7%	390	6.5%	321	7.5%
6+	38	0.6%	30	0.5%	24	0.6%
TOTAL	6,281	100.0%	5,964	100.0%	4,308	100.0%

* Through September only

Source: Austin Multi-List Service



vi. **Protected Class Status and Housing Problems**

Lower-income minority households tend to experience housing problems at a higher rate than lower-income White households, a circumstance due at least in part to the disparity in median income among racial and ethnic groups.¹² Among lower-income households in Williamson County, Black renters experienced housing problems at the highest rates, while White renters had the lowest rates. Among Black renter households, 71.5% had a housing problem in 2000, compared to 62.7% of White households and 66% of Hispanic households. Black family households with five or more members had the highest rates of housing problems among renters.

Among owner households earning less than 80% MFI in Williamson County, Blacks also had the highest rates of housing problems, at 64.9%. Hispanic owner households had rates lower than Black households at 57.5%. White owner households experienced lower rates of housing problems, at 55.8%.

Figure 2-30
Lower-income Households with Housing Problems, 2000

	Total Households 0-80% of MFI		Elderly & 1-2 Person		Family Households 0-80% of MFI		All Other Households	
	Total	% with a Housing Problem	Total	% with a Housing Problem	Total	% with a Housing Problem	Total	% with a Housing Problem
Renters								
White Non-Hispanic	7,570	62.7%	1,500	62.0%	3,245	59.5%	2,825	66.7%
Black Non-Hispanic	921	71.5%	87	60.9%	545	75.3%	289	67.5%
Hispanic	2,630	66.0%	175	62.9%	1,985	67.5%	470	60.7%
Total*	11,121	64.2%	1,762	62.0%	5,775	63.7%	3,584	65.9%
Owners								
White Non-Hispanic	10,560	55.8%	3,775	40.1%	5,160	64.4%	1,625	64.6%
Black Non-Hispanic	723	64.9%	119	53.8%	500	61.0%	104	96.1%
Hispanic	2,035	57.5%	255	41.2%	1,645	61.1%	135	44.5%
Total*	13,318	56.5%	4,149	40.5%	7,305	63.4%	1,864	

* Includes additional race groups

Source: HUD Comprehensive Housing Affordability Strategy data

➤ **Observation**

Lower-income Black renters and lower-income Black homeowners experienced housing problems at greater rates than Whites and Hispanics.

Among renter households, almost three-quarters of Blacks had housing problems, compared to 62.7% of Whites and 66% of Hispanics.

¹² HUD defines housing problems as (1) cost burden of 30% or more (i.e. paying more than 30% of gross income on monthly housing expenses), and/or (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room.



3. Evidence of Housing Discrimination

This section analyzes the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

Citizens of Williamson County can receive fair housing services from a variety of organizations, including but not limited to the Texas Workforce Commission Civil Rights Division and the Austin Tenants' Council. These groups provide education and outreach, sponsor community events, process fair housing complaints, and in some cases investigate complaints through testing, and/or work to promote a mutual understanding of diversity among residents.

A. Existence of Fair Housing Complaints

A lack of filed complaints does not necessarily indicate a lack of a problem. Some persons may not file complaints because they are not aware of how to file a complaint or where to go to file a complaint. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Also, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. According to the Urban Institute, 83% of those who experience housing discrimination do not report it because they feel nothing will be done. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

i. U.S. Department of Housing and Urban Development

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives complaints from persons regarding alleged violations of the federal Fair Housing Act. Fair housing complaints originating in Williamson County were obtained and analyzed for the six-and-a-half year period of January 2005 through July 2011. In total, HUD reported receipt of 85 complaints originating in Williamson County during this period, an average of approximately 13 per year. However, 40 of the complaints originated in the portions of Austin and Round Rock that fall within Williamson County. Complaints originating in these cities have been removed from the data pool, as Austin and Round Rock are HUD entitlement cities that do not participate in the Urban County's CDBG program. Focusing the review of complaints on those occurring in the Urban County alone allows for the more precise identification of trends that the Urban County has the jurisdiction to address. Within the Urban County, 45 housing complaints were filed during the last five years, an average of about seven annually.

The volume of Urban County complaints filed has increased in recent years. While there were two, six and four cases filed in 2005, 2006 and 2007, respectively, there were 14 cases filed in 2008, eight in 2009 and 10 in 2010. HUD provided data regarding closed cases only, so it is unclear how many additional cases are currently unresolved.



HUD provided information on the geographic distribution of some cases. Fair housing complaints originated in localities across the Urban County, with the greatest occurrence in Georgetown, where 19 complaints were based. While 10 cases were filed in Cedar Park, no other jurisdiction had more than five fair housing complaints during the six-plus years studied. A review of complaint bases, types and outcomes revealed no particular geographic patterns.

Figure 3-1
Origination Locations for Complaints Filed with HUD

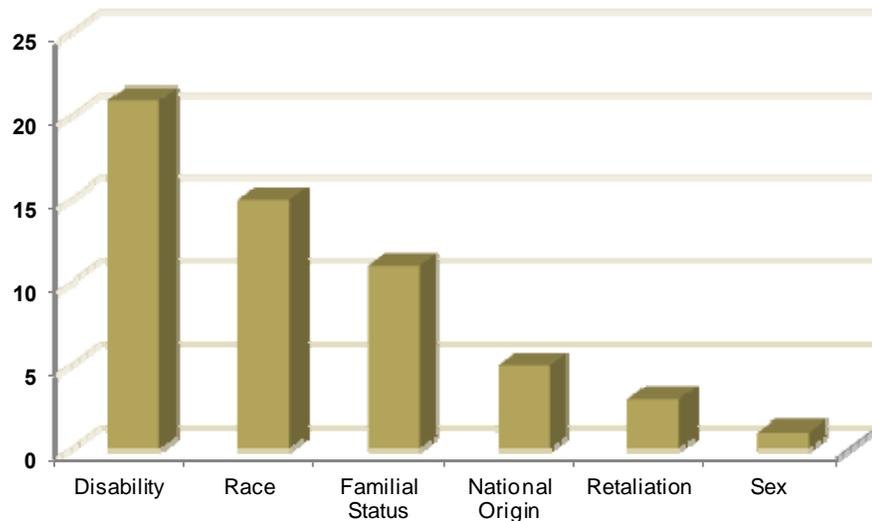
	Total complaints per jurisdiction
Georgetown	19
Cedar Park	10
Leander	5
Taylor, Hutto	4
Liberty Hill	2
Florence	1

Note: From January 2005 to July 2011

Source: HUD FHEO, Fort Worth Regional Office

Disability was the most common basis for complaint, followed by race and familial status. Of the 45 complaints filed, at least half were filed on two or more bases; as a result, the following chart reflects a higher total.

Figure 3-2
HUD Complaints by Basis of Discrimination in the Urban County, 2005-11



Of the 45 complaints that were resolved as of July 2011, 10 (22.2%) were conciliated with a successful settlement. Of these, six involved disability, while three involved familial status and two involved race. The complaints settled through conciliation were not concentrated in any particular geographic area – there were four in Georgetown and two each in Cedar Park, Liberty Hill and Taylor. In the 10 settled cases, terms and conditions were the most common issue cited (a factor in six cases), followed by issues of accessibility and failure to make reasonable accommodation (factors in three cases) and discriminatory advertising (a factor in three cases).

Across all 45 complaints filed with HUD, discriminatory terms, conditions and privileges in general was the most commonly cited issue, factoring into more than one-third of all cases. Rental terms, conditions and privileges were cited in one-third of cases, while refusal to rent or negotiate for rental was alleged in one in every five cases. Most cases involved more than one issue.

Figure 3-3
Issues Cited in HUD Complaints in the Urban County, 2005-2011

Issue for complaint	Occurrence	% of Total
Terms, conditions, privileges or services/facilities	16	35.6%
Rental terms/conditions/privileges	10	22.2%
Refusal to rent/negotiate for rental	9	20.0%
Failure to make reasonable accommodation	8	17.8%
Advertising, statements and notices	5	11.1%
Terms/conditions/privileges relating to sale	5	11.1%
Refusal to sell/negotiate for sale	5	11.1%
Noncompliance with design/construction requirements	4	8.9%
Discriminatory acts under Section 818 (coercion, etc)	3	6.7%
Failure to provide usable doors	2	4.4%
Failure to provide accessible light switches, etc	2	4.4%
Failure to provide usable kitchens, bathrooms	2	4.4%
Financing	1	2.2%
Terms/conditions of loans	1	2.2%

Source: HUD FHEO, Fort Worth Regional Office

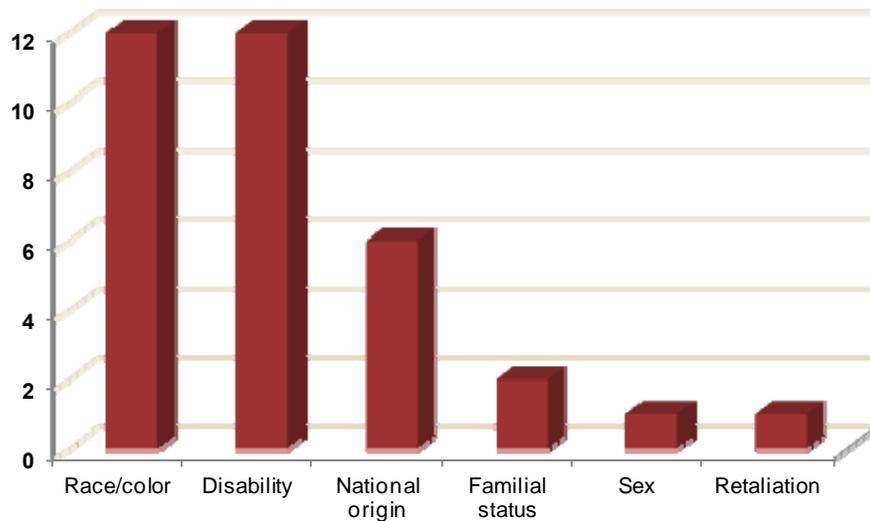
Of the total complaints filed, 20 (44.4%) were found to be without probable cause. This occurs when the preponderance of evidence obtained during the course of the investigation is insufficient to substantiate the charge of discrimination. Another 15 cases (33.3%) were administratively closed, due to complaint withdrawal before or after resolution, judicial dismissal or the complainant's refusal to cooperate.



ii. **Texas Workforce Commission Civil Rights Division**

The Texas Workforce Commission Civil Rights Division (TWCCRD) accepts and investigates fair housing complaints, cross-filing each it receives with HUD. While both organizations maintain a record of the case, only one agency investigates and seeks resolution of each case. TWCCRD provided data on 32 resolved housing complaints originating across Williamson County between January 2005 and July 2011. It is unclear whether these records overlap the cases reported by HUD for the purpose of this AI. Additionally, because TWCCRD did not report localities, the dataset includes all of Williamson County, not excluding the entitlement communities of Austin and Round Rock. The number of complaints reported each year generally increased, from two in 2004 and one in 2005 to five in 2006 and 2008, four in 2007, six in 2009 and seven in 2010. The bases for complaint are illustrated in Figure 3-4.

Figure 3-4
TWCCRD Complaints in Williamson County by Basis of Discrimination, 2005-11



Of the 32 total filings reported by the TWCCRD, 12 (37.5%) alleged discrimination on the basis of race, 12 on the basis of disability, six on the basis of national origin and two on the basis of familial status. This breakdown of the bases for discrimination is generally consistent with the five-year analysis of HUD complaints, of which 46.7% involved race and 33.3% involved disability.



> Observation

Across Williamson County, race and disability were the primary bases for fair housing complaints to both HUD and the Texas Workforce Commission Civil Rights Division between 2005 and 2010.

More than two-thirds of all fair housing complaints involved issues of race, disability or both.

All of the 32 complaints reported by TWCCRD were closed as of July 2011. Nearly half of all cases (14 or 43.8%) were found to be without probable cause. The remaining 12 cases (37.5%) were adjusted and withdrawn or administratively closed due to lack of jurisdiction, timeliness, failure of the complainant to cooperate or other reasons. Six cases (18.8%) were resolved through conciliation agreements.

All of the six cases that ended in conciliation agreements involved disability as a basis for complaint. Of these, four alleged discriminatory terms, conditions, privileges or services, two alleged failure to make or permit reasonable accommodations or modifications, two alleged failure to meet senior housing exemption criteria, one involved refusal to sell and one alleged discriminatory advertising.

iii. Austin Tenants Council

The Austin Tenants Council (ATC), based in neighboring Travis County, is a HUD-certified counseling agency that participates in HUD's Fair Housing Initiatives Program (FHIP), through which ATC partners with HUD to help people identify government agencies that handle complaints of housing discrimination. The Council currently does not have a contract with Williamson County to provide landlord-tenant services or fair housing education and outreach. However, the Council accepts and processes fair housing complaints originating in Williamson County. In settling complaints, ATC's primary goal is not financial compensation, but generally compelling defendants to complete fair housing training and, if applicable, make reasonable accommodations.

The Council reported the intake of 198 Williamson County cases between January 1, 2008, and October 20, 2011. Disability was far and away the most commonly reported protected class status among complainants, as 127 (64%) cited a physical disability, and 27 (14%) cited a mental disability. Beyond this, the most common protected class among complainants was race, which was an issue for 32 (16%). Lesser cited issues included familial status (8%), sex (6%) and national origin (5%). One complainant cited sexual orientation, though Williamson County residents are not currently offered this protection by local, county, state or federal law.

➤ Observation

The prevalence and variety of housing discrimination complaints across Williamson County justify the need for continued real estate testing and amplified education and outreach efforts, especially as they relate to the rights of disabled individuals and the corresponding responsibilities of landlords.

B. Testing

As part of its activities under HUD's Fair Housing Initiatives Program (FHIP), the Austin Tenants Council has conducted between 100 and 150 fair housing tests across Central Texas in recent years. Testing commonly occurs when new multi-family rental properties come online to determine whether facilities are designed and built according to the standards of accessibility mandated by federal law. ATC has found multiple sites in violation, including those in receipt of federal funding. The Council also conducts paired testing of advertised rental or sales properties to determine whether landlords, realtors or sellers comply with their responsibilities under the Fair Housing Act.

Particular to Williamson County, ATC reported the following testing results in which possible evidence of discrimination was found. Five additional results do not appear for Austin and Round Rock, which are separate entitlement communities outside the jurisdiction of the Urban County.

- **Cedar Park:** A Craigslist user advertised for a "white male or white female roommate wanted and no medical problems." A complaint was investigated by TWCCRD and a conciliation agreement reached.
- **Georgetown:** Design and construction deficiencies were noted at Parkview Place, which benefited from HOME funding. A complaint was investigated by HUD and a conciliation agreement reached.
- **Hutto:** A familial status complaint and design and construction deficiencies were reported at The Mansions at Star Ranch Country Club. A complaint was investigated by HUD. HUD is processing a reconsideration request of its initial "no cause" finding.

➤ Observation

The results of testing across Central Texas and in Williamson County indicate that newly constructed multi-family rental properties do not always comply with the applicable design and construction standards for accessibility required by law.

C. **Existence of Fair Housing Discrimination Suit**

There is no pending fair housing discrimination suit involving Williamson County.

D. **Determination of Unlawful Segregation**

There is no pending unlawful segregation order involving Williamson County.



4. Review of Public Sector Policies

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are 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, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the Urban County to determine opportunities for furthering the expansion of fair housing choice.

A. Policies Governing Investment of Federal Entitlement Funds

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower-income households has shifted much of the challenge of affordable housing production to state, county and local government decision makers.

The recent Westchester County, NY, fair housing settlement also reinforces the importance of expanding housing choice in non-impacted areas (i.e. areas outside of concentrations of minority and LMI persons). Westchester County violated its cooperation agreements with local units of government which prohibit the expenditure of CDBG funds for activities in communities that do not affirmatively further fair housing within their jurisdiction or otherwise impede the county's action to comply with its fair housing certifications. As an Urban County jurisdiction, Williamson County is similarly bound to ensure that its entitlement funds are applied only in ways that are consistent with this aim.

Williamson County receives federal entitlement funds from HUD in the form of the Community Development Block Grant (CDBG) program, the primary objective of which is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income levels. For fiscal year 2011, HUD allocated \$992,796 in formula grant funds to the county. Funds can be used for a wide array of activities, including: housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

The county does not receive HOME funds, which would provide for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. Therefore, the county faces the challenge of expanding housing opportunities for these households via its limited CDBG resources. To accomplish this, the county facilitates affordable housing development indirectly through the investment of CDBG funds in water, sewer, street, sidewalk and similarly eligible infrastructure installation and improvement projects.

➤ Observation

The county focuses its limited CDBG entitlement funds primarily in water, sewer, street, sidewalk and similarly eligible infrastructure installation and improvement projects in an effort to facilitate the development of affordable housing while improving the suitable living environment in a variety of areas.

Currently, the county does not allocate CDBG funds for pure fair housing activities. The provision of fair housing services is eligible as either a program administration cost, per 24 CFR 570.206, or as a public service, per 24 CFR 570.201(e). Such services might include making all persons aware of the range of available housing options, enforcement, education, outreach, avoiding undue concentrations of assisted persons in areas with many low- and moderate-income persons, testing and other appropriate activities. During interviews conducted during the development of the AI, the county stated that it would consider undertaking pure fair housing activities, likely by engaging the services of a qualified provider.

➤ Observation

Pure fair housing activities do not currently factor into the county's annual CDBG budget. However, the county is open to the possibility of engaging a qualified subrecipient to provide fair housing services in Williamson County.

An allocation of 1% of the annual CDBG budget, equivalent to about \$10,000, could provide a level of services appropriate for the county's needs.

i. Project Proposal and Selection

As the overall governing and management body of Williamson County, the Commissioners Court is ultimately responsible for federal entitlement programs administered by the county. The lead agency in the planning and administration of these programs is the CDBG Office. The Office compiles the Five-Year Consolidated Plan, which establishes policies and priorities to govern entitlement spending. The current Consolidated Plan is effective from 2009 to 2013.

Williamson County allocates its formula grant funds on a competitive basis, making grants to units of government as well as nonprofit agencies. Urban County CDBG projects do not occur in Austin or Round Rock, which are federal entitlement communities in their own right. Jurisdictions participating in the Urban County's CDBG program include Cedar Park, Georgetown, Granger, Jarrell, Leander, Liberty Hill, Taylor, Thrall and Weir. Other

incorporated communities that do not participate, such as Florence, Hutto and Pflugerville, have opted out of the Urban County program to participate for funds available at the state level. The CDBG Office reviews all applications and makes recommendations to the Commissioners Court relative to allocation decisions. Almost without exception, Commissioners rely on the programmatic expertise of staff and accept staff recommendations for funding approval.

The county annually publishes its CDBG program guidelines and priorities in a packet distributed to potential funding subrecipients. For FY 2011, the county's objectives included the following:

- To fund non-housing community development proposals that eliminate a threat to public health and safety (for example, extension of a water line to an area serving lower-income households whose private wells have been contaminated),
- To fund activities that expand the supply and/or improve the condition of housing available to lower-income households, especially when these projects are undertaken in conjunction with public infrastructure improvements. Housing production allows for units to be added to the market under the assumption that they will provide long-term assistance. Carrying out infrastructure improvements in the immediate vicinity of new housing production will capitalize on the housing investment and add value to a larger residential area,
- To fund public facility proposals that benefit lower-income households and persons, as well as persons with special needs,
- To fund activities that revitalize residential neighborhoods and stabilize business districts that are located within walking distance of residential neighborhoods, and
- To fund projects that leverage other public and private resources.

Applications for the CDBG program are evaluated according to these program guidelines, along with the degree to which they address the housing, homeless, special needs and community development needs established in the county's Five-Year Consolidated Plan. In order to qualify as eligible activities, projects must also meet at least one of HUD's national objectives: benefiting low- to moderate-income persons/households or areas or limited clientele; eliminating slums and/or blight; or meeting an urgent community development need, as in disaster relief.

ii. Spending Patterns

Entitlement jurisdictions are required to prepare Annual Plans describing activities that will be supported by federal entitlement grant funds. At the end of each fiscal year, jurisdictions prepare Consolidated Annual Performance and Evaluation Reports (CAPERs) to report on progress achieved. The County's most recent CAPER, reporting on FY 2010, provides insight as to how the County applies allocation funds to meet the goals and objectives established in the Consolidated Plan.

FY 2010 represents the second program year in Williamson County's Five-Year Consolidated Plan. In 2010, the County received \$1,216,521 in CDBG funds, which it divided among seven infrastructure projects and two social service projects. All serve needs that were classified as "high priority" in the Consolidated Plan. In brief, the projects were as follows:

- Sewer system connections, City of Jarrell and City of Liberty Hill
- Water and wastewater connections, City of Georgetown
- Sidewalk improvements, City of Leander, United Seniors of Taylor, City of Georgetown
- County Mobile Outreach Team
- Water well project, City of Liberty Hill
- Emergency utility bill assistance, City of Georgetown

This funding mix is generally typical of the County's CDBG program, as the County balances maintenance of a sustainable living environment in LMI areas with support for the creation of affordable housing through such infrastructure investments as water and sewer connections. In the past, the County has also more directly applied CDBG funds toward the advancement of affordable housing projects, such as the development of owner housing by Habitat for Humanity and support of a project undertaken by the Georgetown Housing Authority.

iii. Grants to Local Units of Government

The county divides CDBG public infrastructure funds among nine incorporated municipalities on a competitive basis, along with its allocations to other agencies. Generally, the same communities meet eligibility requirements to participate in the program each year. The county currently does not maintain a written policy of denying CDBG grants to communities engaged in discriminatory practices or policies, though the CDBG subrecipient agreement contains a statement of intention to affirmatively further fair housing. As the Urban County is ultimately responsible to ensure that its administration of federal funds meets this aim – and has signed certifications in each of its Annual Plans to this effect – the county must respond to any identified discriminatory policies or practices in participating communities by working with local leaders to correct the identified source of potential discrimination or, in the case by discontinuing CDBG funding support. Any discriminatory action, policy or program should be grounds for the refusal of CDBG allocations.

➤ Observation

The county could strengthen its annual certification to affirmatively further fair housing by adopting a policy to deny CDBG funding to municipalities that are identified as having discriminatory zoning or land use policies.

Given the clarification on HUD's expectations of urban counties in the recent Westchester case, it is important for the county to protect against violations of its certification to affirmatively further fair housing.

iv. Affirmative Marketing Policy

The County is federally required to adopt affirmative procedures and requirements for all CDBG-assisted housing with five or more units. Such a plan should include:

- Methods of informing the public, owners, and potential tenants about fair housing laws and the Urban County's policies
- A description of what the owners and/or the Urban County will do to affirmatively market housing assisted with CDBG funds
- A description of what the owners and/or the Urban County will do to inform persons not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market CDBG-assisted units and to assess marketing effectiveness, and
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

The County has recently prepared and implemented a comprehensive Affirmative Marketing Policy that applies to CDBG, HOME and any other federal funds that might be received. In addition to declaring the County's responsibility to affirmatively market units acquired, rehabilitated, constructed or otherwise assisted with federal funds, the policy explains how the County actively promotes fair housing through the adoption and implementation of the AI, the Consolidated Plan, Annual Action Plans and the CAPER.

The County's Community Planning and Development Office is responsible for implementing affirmative marketing policy and procedures. CDBG recipients are made aware of the policy and their related responsibilities through the attachment of the policy to recipient agreements and by the inclusion of compliance with the affirmative marketing policy as a requirement for the duration of the agreement.

Each recipient of federal funds must:

- use the "Equal Housing Opportunity" logotype or slogan on all correspondence and advertising related to the rental of units,
- advertise housing opportunities in a newspaper of general circulation,
- advertise housing opportunities by circulating flyers to appropriate government buildings, libraries, community centers, neighborhood centers, senior centers and homeless shelter organizations,
- maintain a non-discriminatory hiring policy for staff engaged in the sale or rental of properties
- depict persons of majority and minority groups, including both sexes, in all advertising depicting persons

- prominently display the HUD-approved fair housing poster in all office in which sale or rental activity pertaining to the project occurs, and
- post in a conspicuous location on the project site a sign displaying prominently either the Equal Housing Opportunity logo or slogan or statement.

The County suggests, but does not compel, that funding recipients take various steps to inform persons who are not likely to apply for housing without special outreach, particularly those with limited English proficiency. Steps include targeted outreach to ethnic and racial groups that are underrepresented in the housing development based on their representation in the local area, distributing information about housing openings through outlets (such as places of worship and nonprofit organizations) that serve underrepresented groups and providing advertising in the language spoken by any identified underrepresented group, among other actions.

The plan includes corrective actions that the County will take if it determines that a participating individual, entity or unit of local government has failed to carry out the affirmative marketing efforts required by the County's agreement. After providing information on ways to improve affirmative marketing efforts and allowing a reasonable time period for correction, the County will consider declaring a breach of contract and exercising its rights under the terms of the agreement.

The County notes its regulatory authority to impose sanctions on non-complying recipients of CDBG funds. Per 24 CFR 108.50, "Applicants failing to comply with the requirements of these regulations, the AFHM regulations, or an AFHM plan will make themselves liable to sanctions authorized by law, regulations, agreements, rules, or policies governing the program pursuant to which the application was made, including, but not limited to, denial of further participation in Departmental programs and referral to the Department of Justice of suit by the United States for injunctive or other appropriate relief."

B. Appointed Boards and Commissions

A community's sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members, directorships, and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

In Williamson County, no appointed public volunteer boards or commissions serve at the county level to address issues related to land use, civil rights or housing.

C. Accessibility of Residential Dwelling Units

From a regulatory standpoint, local government measures to control land use (such as zoning regulations) define the range and density of housing resources that can



be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures.

i. Private Housing Stock

In Texas, the Texas Accessibility Standards require accessibility for persons with disabilities in publicly funded, state-owned and state-leased buildings, in addition to public and private buildings as defined by the ADA. Texas law grants counties the authority to write building codes. Williamson County has not done so to date. Therefore, in unincorporated areas of Williamson County, no local building codes apply. The county's authority over new construction projects is limited to the issuance of three permits: driveway (if the property is on a county-maintained road), flood plain and septic system. Plans for multi-family housing projects are sent to the state for review per the Texas Accessibility Standards. Residences in incorporated areas are subject to any building codes that have been locally adopted.

During the development of the AI, the Austin Tenants Council reported that its testing of newly constructed rental projects in Williamson County, with and without assistance from public sources, has revealed sites of both types that are unlawfully inaccessible to persons with physical disabilities.

> Observation

The absence of local oversight over the design and construction of new residential structures is one possible reason for reported instances of noncompliance with federal and state accessibility requirements.

Instead of potentially noncompliant features being identified during the initial phases of building, housing advocates for persons with disabilities reported that noncompliant features are often identified through the fair housing complaints process.

ii. Public Housing Stock

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, an Authority's administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

Georgetown Housing Authority has prepared a Section 504 Needs Assessment and Transition Plan, as well as a self-evaluation of its policies, procedures and practices relative to their impact on persons with disabilities during the application and tenanting process. The Authority reported that it corrected all deficiencies that were identified, pursuant to 24 CFR 8.51.

D. Language Access Plan for Persons with Limited English Proficiency

As noted in an earlier section of this report, the number of LEP Spanish speakers exceeds 1,000.¹³ However, given limitations in ACS data, it is not clear how many persons with LEP are in the Urban County versus Austin and Round Rock, which are separate entitlement communities not served by the county.

The county's CDBG Office should conduct review to determine how many persons with LEP are served by the Urban County's programs. If considerably large LEP populations are among the potential beneficiaries of county programs, the county should perform a four-factor analysis to determine the extent to which the translation of vital documents is warranted.¹⁴ (The term "vital document" refers generally to any publication that is needed to gain access to the benefits of a program or service.) Although there is no requirement to develop a Language Access Plan (LAP) for persons with LEP, HUD entitlement communities are responsible for serving LEP persons in accordance with Title VI of the Civil Rights Act of 1964. Preparation of a Language Access Plan (LAP) is the most effective way to achieve compliance.

The four-factor analysis requires entitlements such as the county to evaluate the need for translation and/or other accommodations based on four factors:

- The number or proportion of persons with LEP to be served or likely to be encountered by the program
- The frequency with which persons with LEP come into contact with the program
- The nature and importance of the program, activity or services provided by the program, and
- Resources available to the grantee vs. costs

> Observation

The CDBG Office should evaluate the prevalence of persons with limited English proficiency being served by Urban County programs and consider conducting a regional four-factor analysis to determine whether a Language Access Plan is warranted.

This population may need assistance accessing local government programs and services.

¹³ The 2010 American Community Survey reported a limited English-speaking ability among 17,612 Spanish speakers.

¹⁴ The four-factor analysis is detailed in the *Federal Register* dated January 22, 2007.

E. Comprehensive Planning

A community's comprehensive plan is a statement of policies relative to new development and preservation of existing assets. In particular, the land use element of the comprehensive plan defines the location, type and character of future development. The housing element of the comprehensive plan expresses the preferred density and intensity of residential neighborhoods within the county. Taken together, the land use and housing elements of the comprehensive plan define a vision of the type of place that a community wishes to become.

Williamson County has not published a comprehensive plan or similar document that contains broad objectives for land use or housing. For practical purposes, the county maintains a Long Term Transportation Plan (LTTP), commonly referred to as the road plan, which lays out 25 years of future transportation needs and strategies to address them. The latest road plan, adopted in 2010, calls for the construction of 100 new miles of road and the addition of lanes along 250 miles of existing road, in addition to intersection improvements and mass transit projects. The LTTP is analyzed in greater detail in the Public Transit section of the AI.

F. Zoning

In Texas, the power behind land development decisions resides with municipal governments through the formulation and administration of local controls. These include comprehensive plans, zoning ordinances and subdivision ordinances, as well as building and development permits. Counties are generally prohibited from controlling land use via zoning, with exceptions for environmentally sensitive areas, military installments and other special cases. Therefore, Williamson County does not exercise substantial land use authority over its unincorporated areas. Zoning in Williamson County is effective strictly at the municipal level, as only incorporated areas are zoned.¹⁵

In 2000, Commissioners Court adopted revisions to a set of subdivision regulations evidently still effective. The regulations recommend that any owner of an intended subdivision meet with the precinct commissioner and the county engineer prior to submitting an application in order to refine the plan. The county has 60 days to approve or reject subdivision plans. Generally, the regulations pertain to ensuring that proper consideration is given to issues of topography, environment and infrastructure. They also contain minimum setbacks of 50 feet from major highways and roads and 25 feet from other roads. The minimum lot size is two acres for lots with private water and sewer facilities.

Control over unincorporated areas commonly takes the form of deed/covenant restrictions. In Williamson County, these contracts between buyer and developer are often similar to zoning criteria and are, according to county staff members, very prevalent. Subdivisions and homeowner associations enforce these contractual obligations by litigation. Any requirement may be included and enforced in a covenant as long as it does not violate local, state or federal law. The county does not have authority over the composition or application of subdivision restrictions, though it makes some of them available for download on its website.

¹⁵ Additionally, incorporated areas may zone outside of their boundaries within extraterritorial jurisdiction, per Section 42.021 of the Texas Local Government Code. The extent of a community's ETJ buffer depends on its population, ranging from one half-mile to five miles.

➤ Observation

County staff observed that discriminatory language may still exist in older restrictive deeds/covenants, though provisions in violation of local, state or federal law cannot be enforced.

For this analysis, zoning ordinances were randomly selected for review among the incorporated communities within the Urban County: Florence, Georgetown and Taylor. Summaries of the zoning ordinances reviewed to identify regulations that may potentially impede fair housing choice are included in Appendix B.

The analysis of zoning regulations was based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities)
- The opportunity to develop alternative designs (such as cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments)
- Minimum lot size requirements
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single family zoning districts
- Restrictions on the number of unrelated persons in dwelling units.

i. Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

All three ordinances reviewed were adopted relatively recently and have been amended through 2010 or 2011. Georgetown's Unified Development Code was originally adopted in 2003; Florence's zoning ordinance was adopted in 1999 and is currently undergoing revision; and Taylor's dates back to 2001. With the exception of the dated term "sanitariums" in reference to psychiatric hospitals in Florence's ordinance, all terms and provisions in each code appear to have been updated pursuant to changes in law and common modern usage.

ii. Residential Zoning Districts and Permitted Dwelling Types

The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and the range of permitted housing types. However, the number of residential zoning districts is indicative of the municipality's desire to promote



and provide a diverse housing stock for different types of households at a wide range of income levels.

Similar to excessively large lots, restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, discourage the development of affordable housing. Allowing varied residential types reduces potential impediments to housing choice by members of the protected classes.

All three zoning ordinances lay out a broad array of land use categories that allow for a variety of housing options. Georgetown maintains seven residential categories ranging from the low-density, rural-character residential estate, to single-family districts of varying density to multi-family and manufactured housing districts. Additionally, the City allows residential uses in non-residential districts, including agricultural and mixed-use zones. Florence has five residential districts: agricultural, single-family, multi-family and two mobile home districts, in addition to non-residential areas where housing is permitted, including the central business district (apartments above ground floor) and the neighborhood commercial district. Taylor has defined nine residential districts, covering agricultural uses, single-family districts of varying density, mixed-use areas, multi-family zones and areas for manufactured housing.

While all three ordinances are expansive in their provision of categories for land uses, a review of current zoning maps demonstrates that the percentage of land dedicated to low-density single-family housing in each city predominates, with agricultural and single-family districts comprising an apparent three-quarters or more of total land area. The amount of land zoned for multi-family housing and manufactured housing, which are typically more affordable than single-family housing, is extremely minimal. In each case, single, isolated lots are designated multi-family or for manufactured housing, in what is apparently more an effort to codify existing land uses than an effort to allocate land for future use. The amount of developable land is undetermined.



Observation

Although each of the zoning ordinances reviewed were noted to permit housing types that might be affordable, the amount of land zoned for the development of multi-family housing was minimal.

iii. Permitted Residential Lot Sizes

Because members of the protected classes are often also in low-income households, a lack of affordable housing may impede housing choice by members of the protected classes. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of

10,000 square feet or less may be permitted, if the cost to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

Minimum lot size requirements range from 2,000 square feet per dwelling unit in a Georgetown multi-family development to as high as 35 acres in Taylor's rural agricultural district. Florence imposes considerably less specific lot dimension regulations than Georgetown and Taylor.

The ordinance in Florence states that all tracts must be at least 10,000 square feet and at least 80 feet wide, though individual lots, such as in mobile home parks, may be as small as 4,000 square feet. In Florence, no more than 40% of a lot can be covered in primary and accessory structures. This relatively large yard requirement is presumably intended to preserve a relatively low-density neighborhood character. Florence also requires that mobile home parks that abut any other residentially zoned area be surrounded by a privacy fence.

In Georgetown, lot size minimums range from one acre in the residential estate district to 1,890 square feet of lot per apartment unit in the multi-family district. Low-density single-family areas require lots of at least 10,000 square feet, and medium-density single-family areas require at least 5,500 square feet. The minimum lot size for townhomes is 2,000 square feet. These requirements as written – not necessarily as allocated by proportion across the city – allow for the preservation of rural character while providing options for more affordable housing types.

In Taylor, single-family districts range from 7,000-square-foot lot minimums to 10,000-square-foot lot minimums. In the lowest-density district, dwellings must cover at least 2,000 square feet. There is no minimum lot area in Taylor's downtown mixed use district, which combines residential and commercial uses to encourage infill and development flexibility. The minimum lot size for both medium-density and high-density multi-family districts is 6,000 square feet, with a maximum density of one unit per 3,000 square feet and one unit per 1,500 square feet, respectively. Taylor's ordinance requires that the façade or entirety of all dwelling structures have a masonry veneer. "One hundred percent of all floors" of all multi-family dwellings "must be a masonry brick or stone veneer." In a similar requirement, the facades of manufactured homes "must have a masonry veneer." This seemingly cosmetic requirement increases the cost of development in Taylor, therefore representing a potential barrier to the development of affordable housing.

➤ Observation

Taylor's requirement of masonry veneers on all multi-family and manufactured dwellings increases the cost of these potentially affordable types of development, potentially deterring their location in the city.

iv. Alternative Design

Allowing alternative designs provides opportunities for affordable housing by reducing the cost of infrastructure spread out over a larger parcel of land. Alternative designs may also increase the economies of scale in site development, further supporting the development of lower-cost housing. Alternative designs can promote other community development objectives, including agricultural preservation or protection of environmentally sensitive lands, while off-setting large lot zoning and supporting the development of varied residential types. However, in many communities, alternative design developments often include higher-priced homes. Consideration should be given to alternative design developments that seek to produce and preserve affordable housing options for working and lower income households.

Both Georgetown and Taylor define Planned Unit Development districts for the ostensible purpose of constructing homes in a cluster arrangement on smaller lots with larger common areas of green space available. PUDs allow for flexibility in planning and designing for unique spaces according to a common development scheme. The concept of including an affordable housing set-aside within this arrangement is generally not common and is not present in either ordinance. PUDs without such set-asides tend to include very low density, non-affordable homes.

Georgetown does, however, potentially expand affordable housing options in another manner. The city's code contains a residential housing diversity component in which flexibility is applied to development standards and allowable housing types for developments that incorporate three or more distinct housing types. Residential housing diversity developments may be located in the residential low-density, residential single-family, residential two-family and townhouse districts.

In Taylor, the downtown mixed-use district carries no minimum lot size. Development flexibility and infill are encouraged in the combination of residential and commercial uses.

v. Definition of Family

Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively impeding housing choice for the disabled. However, in some cases, caps on unrelated individuals residing together may be warranted to avoid overcrowding, thus creating health and safety concerns.

Only one of the three jurisdictions studied defines the term "family." In Taylor, a family consists of one or more persons related by blood, marriage, or adoption; or a group of up to four unrelated persons, occupying a dwelling unit. There is no exception for group homes with disabilities, which effectively limits their size to four. This represents a fair housing concern.

Codes in Georgetown and Florence do not include definitions for “family.” The omission of a definition represents the absence of limitations on who may constitute a family household.

vi. **Regulations for Group Homes for Persons with Disabilities**

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other residential use. Of particular concern are those that serve members of the protected classes such as the disabled. Because a group home for the disabled serves to provide a non-institutional experience for its occupants, imposing conditions are contrary to the purpose of a group home. More importantly, the restrictions, unless executed against all residential uses in the zoning district, are an impediment to the siting of group homes in violation of the Fair Housing Act.

Two primary purposes of a group home residence are normalization and community integration. By allowing group residences throughout the community in agreement with the same standards as applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for the disabled is not impeded. Toward this end, municipalities may not impose distancing requirements on group homes for persons with disabilities.

Georgetown defines a group home as a state-licensed facility or home that provides shared residential living arrangements for the 24-hour protective care of the mentally and/or physically impaired, developmentally disabled or victims of abuse or neglect. The term includes foster homes, congregate living facilities for persons 62 years of age or older and maternity homes. It specifically excludes halfway houses. Group homes with six or fewer residents may locate in any residential district of Georgetown by right, with the exception of multi-family or manufactured housing zones. Group homes with seven to 15 residents may locate in a multi-family, neighborhood commercial or local commercial zone by right, but may not locate in other residential areas, even conditionally. Group homes with 16 or more residents are restricted to neighborhood and local commercial zones, but may locate by exception in multi-family areas. These regulations are consistent with fair housing standards.

There is no definition of either “group home” or of “family” in Florence, which could be reasonably interpreted to mean that group homes for persons with disabilities could locate as a family household in any single-family residential area.

Taylor’s code does not define “group home,” but it limits the number of unrelated persons who may exist as a family household to four. Because there is no exception for group homes for persons with disabilities, this excludes such uses with more than four residents from single-family areas. This represents an inconsistency with the Fair Housing Act.

➤ Observation

Restricting the number of unrelated persons who can live together as a family is a violation of the Fair Housing Act if the restriction limits the number of persons who can reside in a group home for persons with disabilities.

G. Public Housing

Within Williamson County, four public housing authorities operate separately in Georgetown, Granger, Round Rock and Taylor. The authorities own and manage a combined 402 units of public housing at five sites, in addition to 336 units of project-based Section 8 housing at three sites.

Figure 4-1
Inventory of Public Housing Authorities, 2010

	Public Housing Sites	Public Housing Units	Project-Based Section 8 Sites	Section 8 Units
Georgetown	1	158	1	100
Granger	1	26	0	0
Round Rock	1	100	1	94
Taylor	2	118	1	142
Total	5	402	3	336

Source: HUD Public Housing Agency Inventory, January 2010

i. Georgetown Housing Authority

Georgetown Housing Authority, a HUD-designated high-performing agency, owns and manages one public housing development in the city, Stonehaven, and administers 100 project-based Section 8 units. Stonehaven has 96 one-bedroom units, 44 two-bedroom units, 16 three-bedroom units and two units of four or more bedrooms. GHA also owns and operates Shady Oaks, a tax credit property with 24 one-bedroom units, 26 two-bedroom units, eight three-bedroom units and two units of four or more bedrooms.

Within the past three years, GHA abandoned a new proposed tax-credit development, Sierra Ridge, “because funding for the project became impossible to acquire.” In its annual plan, GHA cites the national financial downturn as the main circumstance for the project’s cancellation. However, newspaper articles document other possible reasons for the drying up of funds. The *Austin American-Statesman* reported in 2009 that a question of whether the city of Georgetown should provide funds to support Sierra Ridge stirred up questions about the city’s very identity.¹⁶

“We don’t want to be a Pflugerville,” one city council member said, “when it’s totally 100 percent blue collar.”

Sentiment on council was divided between the notion that Georgetown already had its fair share of affordable housing – more than half of its 3,600 multi-family units at the time were subsidized – and the notion that the city should be economically “integrated and inclusive.”

In arguments that the city needs more affordable housing, GHA reports in its Annual Plan that 73% of jobs in Williamson County are in the service industry; and that 3,660 multi-family dwellings in the city cover only 0.894% of all city acreage, compared to 16,000 single-family dwellings.

To address that need, GHA has recently proposed a \$20 million mixed-use, mixed-income public/private housing development for Georgetown. The

¹⁶ Taboada, M.B. “Officials split over affordable housing: Some say city has too many projects; others say there is still a need for more.” *Austin American-Statesman*, May 30, 2009.



Authority has purchased more than 11 acres for what it refers to as the Gateway Northwest project, which would include 177 to 230 residential units affordable to families making anywhere from below 30% of the area median income to those at 100% and above the median. The site would also include a commercial/retail component to increase the amenities available to residents on Georgetown’s northwest side.

Further demonstrating the need for affordable housing are the waiting lists for GHA programs. As of September 2011, there were 384 applicant households on the waiting list for public housing. Of these, families with children account for 18% and households with a disabled member represent 5.5%. Non-White households represent 33.1% of all waiting list applicants.

Figure 4-2
 Characteristics of Public Housing Applicants, 2011

	Waiting List Applicants	
Total households	384	100.0%
Income level		
Extremely low income (30% or less of AMI)	369	96.1%
Very low income (30.1% to 50% of AMI)	0	0.0%
Low income (50.1% to 80% of AMI)	5	1.3%
Household type*		
Families	69	18.0%
Elderly	21	5.5%
Member with a disability	21	5.5%
Single	45	11.7%
Race and ethnicity		
Black	121	31.5%
White	257	66.9%
Asian	2	0.5%
Other race	4	1.0%
Hispanic **	127	33.1%

* Categories are not mutually exclusive.

** Hispanic ethnicity is counted independently of race for current residents, included among racial groups for the waiting list.

Source: Georgetown Housing Authority, September 2011

In addition to public housing, the Authority administers the Section 8 Housing Choice Voucher Program. The waiting list has been closed since May 2011 and is expected to remain closed for at least four to five years. Families with children account for nearly two-thirds of all applicants currently on the waiting list for vouchers. Non-White households represent 67.5% of all voucher applicants.



Figure 4-3
Characteristics of Housing Choice Voucher Applicants, 2011

	Waiting List Applicants	
Total households	529	100.0%
Income level		
Extremely low income (30% or less of AMI)	444	83.9%
Very low income (30.1% to 50% of AMI)	12	2.3%
Low income (50.1% to 80% of AMI)	71	13.4%
Household type*		
Families	348	65.8%
Elderly	41	7.8%
Member with a disability	12	2.3%
Single	12	2.3%
Race and ethnicity		
Black	349	66.0%
White	172	32.5%
Asian	2	0.4%
Other	6	1.1%
Hispanic **	86	16.3%

* Categories are not mutually exclusive.

** Hispanic ethnicity is counted independently of race for current residents, included among racial groups for the waiting list.

Source: Georgetown Housing Authority, September 2011

a. Housing Choice Voucher Administrative Plan

Section 1.1 of GHA's Housing Choice Voucher Admin Plan includes a fair housing policy in which the Authority states its anti-discrimination policy. The list of protected classes includes race, color, religion, marital status, creed, sexual orientation, gender identity, age, national or ethnic origin, familial status and disability. These categories are far more expansive than those provided at the level of state or federal law.

GHA's policy relative to reasonable accommodations is set forth in Section 1.2 of the plan. GHA states that it will provide a notice to each client that they may, at any time, request reasonable accommodation. When such accommodations are granted, they do not confer special treatment or advantage for the person with a disability, rather, they make the program accessible to them in a way that would not otherwise be possible due to disability.

Section 1.3 contains a description of GHA's services for non-English speaking applicants and participants. At any time, such a person may request the use of an interpreter or translator or any other services available in their contact with GHA. GHA reported in an AI questionnaire that it publishes documents in both English and Spanish.

Section 1.4 covers GHA's policy relative to outreach. GHA publicizes information about the Section 8 voucher program in newspapers of general circulation and, to reach persons who cannot or do not read newspapers, GHA may distribute fact sheets to broadcast media and initiate personal contacts with media members and community service



personnel. GHA will assist managers and owners who are current or potential program participants by explaining how the program works, how it benefits landlords and what responsibilities it requires of landlords. GHA staff members remain available for questions and requests for written materials.

Among the responsibilities the Authority lists for itself in section 2.1, GHA lists seeking expanded opportunities for assisted families to locate housing in all locations, to encourage owners to make units available for leasing in the program, and to further fair housing goals and comply with equal opportunity requirements.

In order to be eligible to receive a Section 8 Housing Choice Voucher, the applicant must qualify as a “family.” In Section 3.1 of the Admin Plan, GHA defines “family” as:

1. A single person 62 years or older,
2. A disabled person either who is 18 years or older and is not declared as a dependent by a parent or guardian or who is a dependent living in a group home or similar supervised residence,
3. A household with a child or children who resides in the unit more than 51% of the time,
4. Two or more elderly persons or disabled persons living together, or one or more elderly or disabled persons living with one or more live-in aides,
5. Two or more persons related by blood, marriage, domestic partnership, adoption or placement by a governmental or social service agency, as defined by City of Georgetown code, or
6. A single adult that is not part of another household.

Section 4.1 states a series of actions that will occur upon the opening of the waiting list for vouchers, implying that the list was closed at the time the plan was written.

GHA does not maintain any local waiting list preferences, instead using a random number lottery selection of applications to determine the admission sequence for applicants. GHA retains the right to skip higher income families on the waiting list if necessary to meet the statutory requirement that 75% of newly admitted families in any fiscal year be families who are extremely low-income as defined by HUD.

GHA sets an initial term of 60 days on vouchers, though applicants may gain two extensions not to exceed 120 calendar days from the date of first issue. Households with a disabled member may be granted up to 180 days to find a suitable unit.

GHA will investigate and respond to complaints by participant families, owners and the general public. GHA may require that complaints, other than housing quality standards violations, be put in writing. Anonymous complaints are investigated whenever possible. GHA’s complaints



process involves an informal review, formal review and/or hearing, depending on the circumstances of the case.

HUD requires that the payment standard be set by a housing authority between 90% and 110% of the FMR. The maximum payment standard for a voucher issued by GHA is 110% of the published FMR or any exception payment standard approved individually by HUD. GHA reports that voucher holders generally do not have difficulty locating a suitable unit, as there is adequate landlord participation in the program.

b. Admissions and Continued Occupancy Policy

GHA's Admissions and Continued Occupancy Policy (ACOP) applies to its conventional public housing developments, which consist of the 158-unit Stonehaven community. Chapter One establishes the Authority's general policies. GHA states that it will not discriminate against persons on account of race, color, sex, religion, age, familial status, disability or national origin. With the added provision of age, these protected classes are consistent with state and federal law. They are, however, less inclusive than the classes protected by GHA's Section 8 Administrative Plan, which states that the Authority will also not discriminate based on marital status, creed, sexual orientation or gender identity.

➤ Observation

The Georgetown Housing Authority should protect the same classes from discrimination in both its Housing Choice Voucher and public housing programs.

GHA's policy on reasonable accommodations also appears in Chapter One. GHA will make structural modifications to its housing and non-housing facilities, make reasonable accommodations or combine both actions to permit people with disabilities to take full advantage of the housing program.

With regard to making communication available to all potential and current clients, GHA states a policy to make documents available in formats accessible to those with vision, hearing and language impediments. Any notice or document relative to citizen or eligible immigration status, as feasible, will be provided in a language that is understood by the individual. At the point of initial contact, Authority staff asks all applicants whether they need some form of communication other than plain-language paperwork. Alternative forms of communication might include sign language interpretation, having materials explained orally by staff, either in person or by phone, large-type materials, information on tape or having someone (friend, relative, advocate) accompany the applicant to receive, interpret and explain housing materials.

GHA's outreach policy is intended to maintain a well-balanced application pool that meets eligibility and screening criteria, based on the level of vacancies, unit availability through turnover, waiting list characteristics and available funding.

In order to be eligible for a GHA public housing unit, an applicant must qualify as a family (via criteria identical to those listed in the Admin Plan, above), qualify as a U.S. citizen or non-citizen with eligible immigration status, must have an annual family income within the federally determined income limits, must provide a valid social security number for all family members age 6 and older (or certify that they do not have numbers), and meet or exceed GHA's suitability screening standards, which include the successful completion of an orientation session, a positive rental history for the past three years and a lack of criminal history.

GHA's policy is to select tenants without regard to protected class status. Eligible applicants shall be offered a dwelling unit based on the time and date of application, after taking into consideration the size of the unit. However, GHA retains the right to apply mixed-income criteria to provide, where appropriate, for the deconcentration of poverty and income-mixing by bringing higher-income tenants into lower-income developments and vice versa.

When a unit becomes available, a GHA manager contacts the applicant at the top of the list to schedule an appointment for the completion of the application process. The manager specifies the date and time of this appointment. Any rescheduling must be completed at least 48 hours in advance. If an applicant fails to appear or is more than 15 minutes late, the applicant's application is terminated and the applicant's name is deleted from the waiting list. However, reasonable accommodations may be made for applicants with a verified disability or emergency.

An applicant is only offered one housing unit each time the applicant arrives at the top of the waiting list and is deemed eligible. The applicant must accept or reject the unit orally or in writing within seven calendar days, or a rejection will be assumed. If the unit is rejected, the applicant is removed from the waiting list, except in cases where the rejection is based upon:

- An acceptable verified disability which, in GHA's opinion, warrants another offer, or
- The location of the offered unit potentially resulting in a documented undue hardship *not* related to considerations of race, age, color, sex, familial status, religion, disability or national origin. Mere inconvenience in travel time is not an undue hardship – to constitute an undue hardship, employment, benefits or programs must be completely inaccessible. An applicant's desire to live in a certain part of town or near family members or school preference do not qualify as undue hardship.

In regard to unit placement, GHA will allow a husband and wife or persons of the same sex who are engaged in a consensual sexual relationship plus an infant under the age of six months to reside in a one-bedroom unit at the request of the resident, in order to comply with the guidelines of the Texas Commission on Human Rights. Upon the infant



reaching the age of six months, the family will be required to transfer at its own expense pursuant to the transfer policy.

When an applicant is determined not to be eligible for assistance for any reason, the applicant shall be notified in writing of such ineligibility. The notice must specify the reasons for the determination and offer the applicant an opportunity for a review of the decision. The notice shall inform the applicant that she or he has 14 calendar days from the date of the notification letter to request in writing an informal hearing, to be conducted by a Hearing Officer, an impartial, disinterested person selected by the Authority who is willing to hear the complaint and render a decision. The informal review does not deprive the applicant of other rights if she or he believes that she or he has been discriminated against on the basis of protected class status. The Hearing Officer's decision is final.

In grievance proceedings, a Hearing Officer or a hearing panel appointed by GHA may preside, depending on the case.

GHA allows residents to keep pets of certain sizes and types, according to a set of rules. This chapter states that no part of the pet policy is to be applied in a way that would prohibit persons with disabilities from "realizing the benefits of housing via a reasonable accommodation of exemption," provided that the exemption would not cause an undue administrative burden. Residents seeking an exemption to the pet policy must provide a professional medical opinion attesting to the resident's disability, stating a physician's conclusion that in his/her medical opinion, a disability exists that meets GHA's definition, that there is a relationship between the person's disability and the need for the animal, and that the animal is needed to assist with the disability.

ii. **Granger Housing Authority**

Informational material requested from the Granger Housing Authority was not provided for this report.

iii. **Round Rock Housing Authority**

Informational material requested from the Round Rock Housing Authority was not provided for this report.

iv. **Taylor Housing Authority**

Informational material requested from the Taylor Housing Authority was not provided for this report.



H. Taxes

Taxes impact housing affordability. While not an impediment to fair housing choice in and of themselves, real estate taxes can impact the choice that households make with regard to where to live. Tax increases can be burdensome to low-income homeowners, and increases are usually passed on to renters through rent increases. Tax rates for specific districts and the assessed value of all properties are the two major calculations used to determine revenues collected by a jurisdiction. Determining a jurisdiction's relative housing affordability, in part, can be accomplished using tax rates.

However, a straight comparison of tax rates to determine whether a property is affordable or unaffordable gives an incomplete and unrealistic picture of property taxes. Local governments with higher property tax rates, for example, may have higher rates because the assessed values of properties in the community are low, resulting in a fairly low tax bill for any given property. In all of the communities surrounding a jurisdiction, comparable rates for various classes of property (residential, commercial, industrial, etc.) are assigned to balance each community's unique set of resources and needs. These factors and others that are out of the municipality's control must be considered when performing tax rate comparisons.

Real estate taxes are the primary source of government revenue in Texas, levied on land and buildings to revenue streams for counties, municipalities, and school districts. The state is one of only six in the nation that does not levy personal income taxes. This, in part, explains what is a comparatively high property tax burden for Texas residents compared with those living in other states. An online aggregator of state tax records estimates that Texas residents pay 3.65% of their annual income in property taxes, the 12th highest percentage of income across the country.¹⁷

The Williamson Central Appraisal District (CAD) decides what property is to be taxed and its appraised value, grants exemptions, and identifies what taxing jurisdictions can tax a property. The Williamson CAD is a separate local agency and is not part of County government or the Williamson County Tax Assessor's Office. The Williamson CAD determines the January 1 market value of all taxable property, and the property is appraised at that value unless it is a primary residence subject to a cap. Once a property's appraised and market values are equal, further increases (or decreases) in value will depend on the market in that neighborhood. The appraisal process allocates the tax burden to ensure that no one property pays more or less than its fair share.

In an April 2011 press release, the Williamson CAD explained recent trends in property values. "While many areas throughout the country are experiencing limited or no growth," CAD reported, "there were more than 2,800 new homes and over 150 new commercial properties built in Williamson County this past year. With those 2,800 new homes and the small increase in 41% of home values, the preliminary average home market value in Williamson County will rise less than 1% from \$185,558 in 2010 to \$187,088 for 2011."

Following the CAD assessment, each taxing jurisdiction levies a uniform tax millage rate against the assessed value of each property. Levies are measured in tenths of a cent and commonly called "mills." Levies are multiplied by the assessed value of a property to calculate a property owner's real estate tax. For FY 2011, Williamson County had a county-wide millage rate of 0.457687, in addition to individual school

¹⁷ IRS-reported rates aggregated and analyzed online at tax-rates.org/texas/property-tax

district rates ranging from 1.04 to 1.54 mills and city rates ranging from 0.27 to 0.88888.

Additional levies exist on the level of municipal utility districts (MUDs), which are political subdivisions of the state authorized by the Texas Commission of Environmental Quality (TCEQ) to provide water, sewage, drainage and other services. Twenty-four MUDs within Williamson County maintain rates of 0.36 to 0.95 mills.

Finally, various levies exist in special districts to serve specific purposes, such as emergency service districts, volunteer fire departments, a community college, local road improvements or local parks and recreation programming.

The owner of a home valued at \$175,100, the 2010 median home value in Williamson County, would pay an estimated \$3,870 in total property taxes, equivalent to 2.21% of the property's total value. A homeowner's total tax bill depends on the tax rates set by the municipality, school district, MUD and any special districts in the area. A comparison of rates appears in Figure 4-4.

Rates across cities range from 0.265234 in Weir to 0.888817 in Granger. Variation across school districts is less pronounced, as rates range from 1.040050 in Coupland to 1.499760 in Leander.

Figure 4-4

Williamson County Millage Rates by Taxing Body, 2011

Cities	Rates	School Districts	Rates
Austin	0.481100	Coupland	1.040050
Bartlett	-	Florence	1.300000
Cedar Park	0.493501	Georgetow n	1.358000
Florence	0.741697	Granger	1.105000
Georgetow n	0.387500	Hutto	1.154005
Granger	0.888817	Jarrell	1.390000
Hutto	0.516545	Leander	1.499760
Jarrell	0.469854	Liberty Hill	1.335000
Leander	0.670420	Pflugerville	1.480000
Liberty Hill	0.442573	Round Rock	1.335000
Pflugerville	0.599000	Taylor	1.450000
Round Rock	0.423210	Thrall	1.210000
Taylor	0.813893		
Thrall	0.504140		
Weir	0.265234		

Source: Williamson County Assessment District

Texas and Williamson County have several tax relief programs available to eligible property owners. These include the following:

- School taxes: All residential home owners may qualify to receive a \$15,000 homestead exemption from their home's value for school taxes.
- County taxes: If a county collects a special tax for farm-to-market roads or flood control, a residential home owner may qualify to receive a \$3,000 exemption for this tax.



- Age 65 or older and disabled exemptions: Individuals 65 and older and/or disabled residential home owners may qualify for a \$10,000 homestead exemption, in addition to the \$15,000 exemption for all homeowners. If the owner qualifies for both the \$10,000 exemption for 65 and older homeowners and the \$10,000 exemption for disabled homeowners, the owner must choose one or the other.
- Optional percentage exemptions: Any taxing unit, including a city, county, school, or special district, may offer an exemption of up to 20% of a home's value or a property tax freeze for homeowners who are 65 or older or disabled. Some restrictions apply.
- Optional 65 or older or disabled exemptions: Any taxing unit may offer an additional exemption amount of at least \$3,000 for taxpayers age 65 or older and/or disabled.
- Disabled veterans are eligible for exemptions up to 100%.

I. Public Transit

Households without a vehicle, which in most cases are primarily low-moderate income households, are at a disadvantage in accessing jobs and services, particularly if public transit is inadequate or absent. Access to public transit is critical to these households. Without convenient access, employment is potentially at risk and the ability to remain housed is threatened. The linkages between residential areas (of concentrations of minority and LMI persons) and employment opportunities are key to expanding fair housing choice.

According to the 2010 American Community Survey, there were 4,399 transit-dependent households in Williamson County, comprising 3% of all households. The majority of households without access to a vehicle (72.4%) were renters.

Figure 4-5
Means of Transportation to Work by Race/Ethnicity, 2010

	White		Black		Hispanic	
Drove alone	141,453	80.5%	10,284	82.6%	34,902	75.3%
Carpooled	16,850	9.6%	1,091	8.8%	7,005	15.1%
Public transportation	929	0.5%	144	1.2%	137	0.3%
Walked	1,247	0.7%	528	4.2%	713	1.5%
Taxi, motorcycle, bike or other	2,239	1.3%	0	0.0%	738	1.6%
Worked at home	13,048	7.4%	409	3.3%	2,854	6.2%
Total	175,766	86.1%	12,456	6.1%	46,349	22.7%

Source: 2010 American Community Survey, B08105A, B08105B, B0810105I

Public transportation is very limited in Williamson County, available primarily in cities and generally not in the form of fixed-route service. The vast majority of county residents (90.8%) drove to work, with 79.6% driving alone.¹⁸ Throughout the county, only 921 workers age 16 and over (0.5%) utilized public transportation to get to work in 2010. Black households were somewhat more likely to use public

¹⁸ 2010 American Community Survey, Table S0802



transportation to travel to work than White households, though Hispanic households were less likely. Across the county, only 0.3% of Hispanic households used public transit, compared to 0.5% of White households and 1.2% of Black households.

While the Capital Metro Transportation Authority offers a variety of bus and rail lines within the City of Austin, routes do not extend into other areas of Williamson County. Within the county, Capital Metro's service area extends only to southern unincorporated areas including Anderson Mill, Jollyville and Pond Springs. When Capital Metro was originally formed in 1985, Pflugerville and Cedar Park participated. These jurisdictions later withdrew. Municipal participation in Capital Metro calls for the approval of a 1% local sales tax to support the system. Texas law limits local sales tax to 2%, so cities that already commit a 2% local sales tax to other purposes cannot participate. Round Rock, for example, could not consider a vote to participate in Capital Metro unless its voters rolled back a portion of the current sales tax to allow room for a 1% Capital Metro tax. As of April 2010, only four cities in Williamson County could potentially join Capital Metro – Bartlett, Granger, Thrall and Weir. The remaining nine already had 2% in sales tax dedicated to other purposes.¹⁹

A fixed-route transit system connecting county residents to downtown Austin and job centers within the county could significantly improve employment opportunities for lower-income persons who typically rely on public transit to access jobs, thus increasing their potential success for better housing, including home ownership. Current research indicates a strong connection between housing and transportation costs. A recent study conducted by The Center for Housing Policy found that there is a clear trade-off between affordable housing and transportation expenses among working families. The research revealed that families who spend more than 50% of their income on housing spend only 7.5% on transportation, while families who spend 30% or less of their income on housing spend almost 25% on transportation. This equates to more than three times the amount spent than those in less affordable housing.

The rationale behind this seemingly reverse equation is that many working families are moving further out into the suburbs where they may be able to afford housing, but then must spend much more of their income commuting to and from their jobs. Others may live in urban neighborhoods but are forced to cross-commute out to jobs in the suburbs. In both cases, the study found that in their attempt to save money on housing, these families spent disproportionately higher amounts on transportation. The study concluded that at about 12 to 15 miles in commuting distance, the increase in transportation costs outweighs the savings on housing.

In July 2010, the Capital Metropolitan Transportation Authority published an expansion policy, including a methodology for calculating the cost of extending services. The report listed requests that CMTA had received for new or expanded transit services beyond Capital Metro Service area. Requests for Williamson County included:

- **Round Rock:** Express commuter service, options for which include connections from park and rides to Tech Ridge park and ride, direct commuter service from Round Rock park and rides, and an extension of Route 935 to Round Rock. Additionally, Round Rock completed a rail feasibility study connecting Georgetown/RR/Pflugerville to the Red Line.

¹⁹ Texas Transportation Institute, The Texas A&M University System. "Capital Metro Service Expansion Policy: A Methodology for Calculating Cost by Type of Service." Prepared for Capital Metropolitan Transportation Authority, July 2010.

- **Cedar Park:** Peak express bus service on Route 983 from the former Cedar Park park and ride. The city is also considering the potential for local fixed-route and flexible-route service. The city has requested a new station on the Red Line.
- **Pflugerville:** The city requested peak express service as well as potential circulator routes. A park and ride may be established for express service.

Observation

Williamson County is not served by a large, fixed-route transit provider.

Participation in Austin's Capital Metro service area requires jurisdictions to levy a 1% sales tax, which has proven prohibitive for Williamson County municipalities. None currently participate. A fixed-route transit system could significantly improve employment opportunities for lower-income persons who typically rely on public transit to access jobs, thus increasing their potential success for better housing.

Williamson County maintains a Long Term Transportation Plan (LTTP), commonly referred to as the road plan, which lays out 25 years of future transportation needs and strategies to address them. The latest road plan, adopted in 2010, calls for the construction of 100 new miles of road and the addition of lanes along 250 miles of existing road, in addition to intersection improvements and mass transit projects.²⁰ The county's first Long-Range Transportation Plan was adopted in 1999 to identify transportation needs for the anticipated population growth for the year 2025. This plan identified roadway projects as short-range improvements (by 2010) and long-range improvements (by 2025). The transit component of the plan was based on the transit network identified for Williamson County in the Capital Area Metropolitan Planning Organization's (CAMPO) 2020 Metropolitan Transportation Plan (MTP). In late 2007, Williamson County updated the transportation plan to identify improvements that would be considered in CAMPO's 2035 MTP. The update of the Williamson County Long-Range Plan used the travel-demand model from CAMPO's 2030 MTP as a foundation.

The public transportation element of the 2010 LTTP reflects the Capital Metropolitan Transit Authority's (CMTA) All Systems Go Plan that was included in CAMPO's 2030 MTP. It also includes information on the Round Rock Rail Link project as a future feature. According to the LTTP, Round Rock, Cedar Park and Georgetown are currently exploring transit options with entities such as Capital Metro and the Austin-San Antonio Commuter Rail District. The county reported that it may consider contributing funds to these efforts.

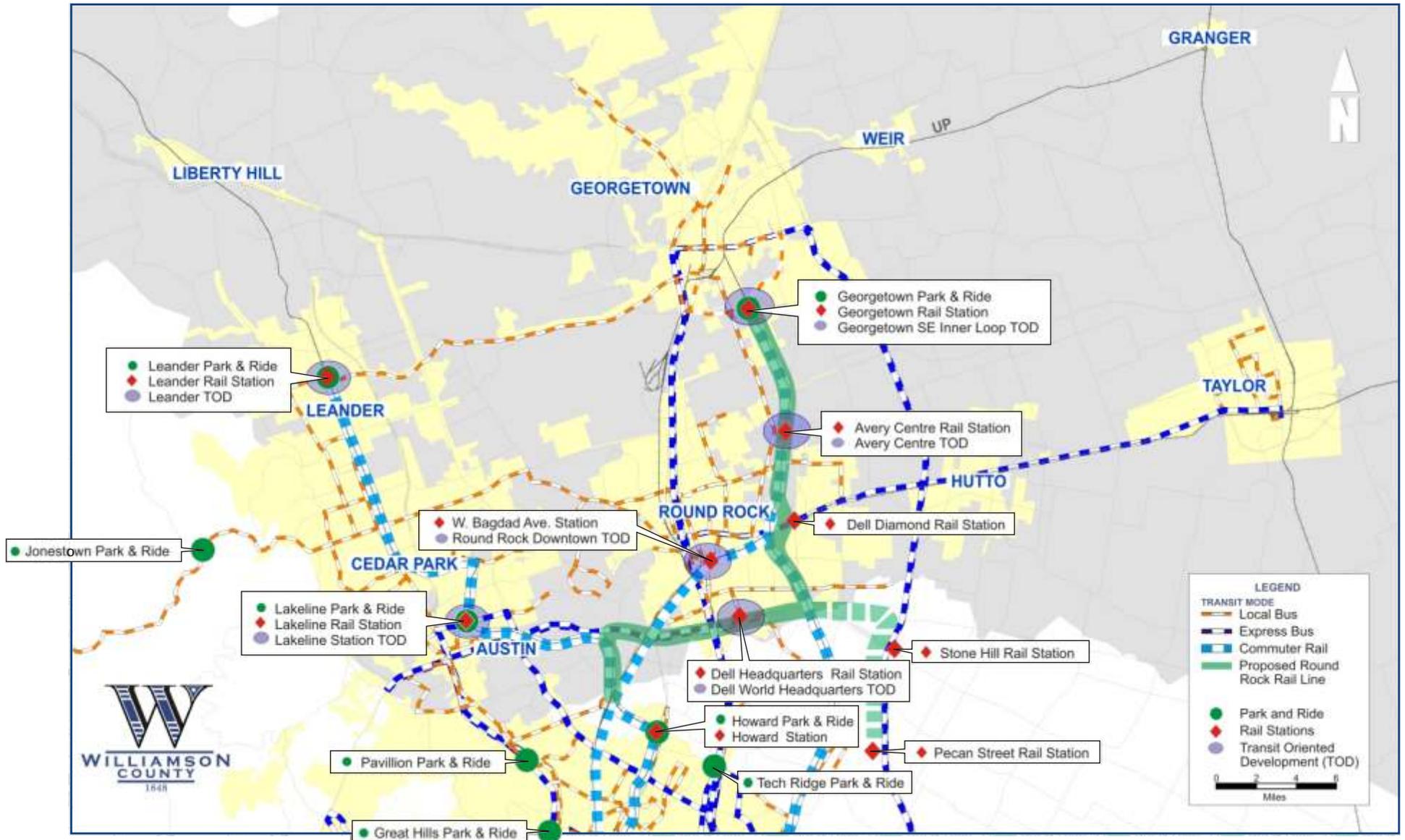
The map on the following page, taken directly from the LTTP, illustrates the county's suggestion for ways in which transit routes could develop.

²⁰ Long-Term Transportation Plan, roadbond.wilco.org

Figure ES-8 Williamson County Transit Possibilities

Several cities in Williamson County, including Round Rock, Cedar Park and Georgetown, are currently exploring transit options with entities such as Capital Metro and the Austin San Antonio Commuter Rail District. As

the county continues to grow and explore multimodal transit opportunities in the future, it may consider contributing funds to these efforts.



5. Private Sector Policies

A. Mortgage Lending Practices

The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals and considering whether to purchase loans. Unfettered access to fair housing choice requires fair and equal access to the mortgage lending market regardless of race, color, national origin, religion, sex, familial status, disability or any other statutorily protected basis.

An analysis of mortgage applications and their outcomes can identify possible discriminatory lending practices and patterns in a community. Home Mortgage Disclosure Act (HMDA) data contains records for all residential loan activity, reported by banks pursuant to the requirements of the Financial Institutions Reform, Recovery and Enforcement Act of 1989. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete by race, sex, and income of the applicant. This information is used to determine whether financial institutions are serving the housing needs of their communities.

The most recent HMDA data available for Williamson County is for 2010. The data included for this analysis is for three years, 2008 through 2010, and constitutes all types of applications received by lenders by families: home purchase, refinancing or home improvement mortgage applications for one- to four-family dwellings and manufactured housing units across the entire County. The demographic and income information provided pertains to the primary applicant only. Co-applicants were not included in the analysis. Figure 5-1 summarizes three years of HMDA data by race, ethnicity, and action taken on the applications, followed by detailed analysis.

Figure 5-1
Cumulative Summary Report Based on Action Taken Mortgage Data, 2008-10

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Purpose										
Home purchase	49,830	49.7%	22,336	44.8%	1,459	2.9%	3,218	6.5%	22,287	44.7%
Refinancing	46,100	46.0%	20,769	45.1%	2,120	4.6%	7,374	16.0%	14,569	31.6%
Home improvement	4,242	4.2%	1,608	37.9%	274	6.5%	1,809	42.6%	450	10.6%
Loan Type										
Conventional	68,734	68.6%	31,913	46.4%	3,157	4.6%	9,895	14.4%	22,250	32.4%
FHA	22,901	22.9%	9,117	39.8%	502	2.2%	1,899	8.3%	11,077	48.4%
VA	6,131	6.1%	2,667	43.5%	158	2.6%	391	6.4%	2,867	46.8%
FHS/RHS	2,406	2.4%	1,016	42.2%	37	1.5%	218	9.1%	1,114	46.3%
Property Type										
One to four-family unit	99,237	99.1%	44,414	44.8%	3,711	3.7%	12,107	12.2%	37,129	37.4%
Manufactured housing unit	880	0.9%	265	30.1%	142	16.1%	296	33.6%	159	18.1%
Applicant Race										
Native American	623	0.6%	254	40.8%	17	2.7%	146	23.4%	196	31.5%
Asian	5,095	5.1%	2,777	54.5%	247	4.8%	583	11.4%	1,368	26.8%
Black	3,090	3.1%	1,241	40.2%	134	4.3%	653	21.1%	1,002	32.4%
Hawaiian	286	0.3%	128	44.8%	11	3.8%	60	21.0%	82	28.7%
White	69,534	69.4%	35,006	50.3%	2,830	4.1%	8,819	12.7%	21,590	31.0%
No information	12,320	12.3%	5,178	42.0%	613	5.0%	2,139	17.4%	3,979	32.3%
Not applicable	9,224	9.2%	129	1.4%	2	0.0%	2	0.0%	9,091	98.6%
Hispanic**	9,816	9.8%	4,132	42.1%	423	4.3%	2,001	20.4%	3,063	31.2%
Total	100,172	100.0%	44,713	44.6%	3,853	3.8%	12,401	12.4%	37,308	37.2%

Source: Federal Financial Institutions Examination Council, 2008 to 2010

Note: Percentages in the Originated, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total

* Total applications also include loans purchased by another institution.

** Hispanic ethnicity is counted independently of race.

i. Applicant Characteristics

Across Williamson County during the latest three years, lenders received 49,830 applications for home purchase mortgages, 46,100 applications for mortgage refinancing and 4,242 home improvement equity loans. Of these, refinancing loans were the most likely to be successful, as 45.1% were approved. Nearly one-third of refinancing applications were withdrawn or left incomplete, and 16% were denied. By comparison, 44.8% of home purchase loans were approved, with nearly an equal proportion – 44.7% – withdrawn or left incomplete and only 6.5% denied. Home improvement loans represent only a small share of all applications, with 4.2% of the total, but carry a notably higher denial rate: 42.6% of applications of this type were rejected, more than the 37.9% that were approved.

Across racial and ethnic groups, loan application types were generally similar. Hispanic and “other race” households, a category that in Williamson County is primarily Native American, had the highest percentage of home improvement mortgage loan applications, as 6.1% and 10.7% of all applications from these groups were for this purpose. By contrast, only 1.8% of Asian applicants sought home improvement loans. The most common loan type across all groups was home purchase.



Figure 5-2
 Loan Application Type by Race/Ethnicity, 2008-10

	Total	White	Black	Asian	Other	No data	Hispanic*
Home purchase	49,830	34,415	1,597	2,700	457	10,661	5,195
	49.7%	49.5%	51.7%	53.0%	50.3%	49.5%	52.9%
Refinance	46,100	31,862	1,340	2,303	355	10,240	4,021
	46.0%	45.8%	43.4%	45.2%	39.1%	47.5%	41.0%
Home improvement	4,242	3,257	153	92	97	643	600
	4.2%	4.7%	5.0%	1.8%	10.7%	3.0%	6.1%
Total	100,172	69,534	3,090	5,095	909	21,544	9,816
	100.0%	69.4%	3.1%	5.1%	0.9%	21.5%	9.8%

Note: Percentages within racial/ethnic groups are calculated within each group's total.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2008 to 2010

The vast majority of applications regarded one- to four-family housing structures, with only 880 applications (less than 1%) requesting financing for manufactured units. The denial rate for manufactured units, 33.6%, was substantially higher than the overall denial rate of 12.4% for all housing types.

The most commonly sought type of financing was conventional loans, a category that represented about two-thirds of all loan applications. An additional 22.9% of applications were for loans insured by the Federal Housing Administration (FHA), a type of federal assistance that has historically benefited lower-income residents. Smaller percentages of applications were for loans backed by the Department of Veterans Affairs (VA) or Farm Services Administration or Rural Housing Service (FSA/RHS).

The racial composition of loan applicants differs somewhat from the county's general demographic distribution. While 17.1% of all Williamson County households in 2010 were Hispanic, Hispanic households constitute only 12.5% of the loan applications for which racial/ethnic data were reported. Similarly, 6% of all households in the county were Black, while only 3.9% of the loan applications for which race was reported were filed by Black households. Asian and White households are overrepresented among mortgage applicants, representing a share of applications exceeding their share of all households countywide (6.5% and 88.4% of applications, respectively, compared 4.2% and 82% of households). Lower participation in the market for home mortgages by Black and Hispanic households is likely a reflection of the lower median incomes among those groups.

Grouping all three years of data into the analysis increases the likelihood that differences among groups are statistically significant. This is especially important in view of the data on mortgage application denials, which also suggests differences according to race and ethnicity.



ii. **Application Denials**

During the years 2008 through 2010, a total of 12,401 mortgage loan applications were denied across Williamson County. The overall cumulative denial rate was 12.4%, with denials by race and ethnicity ranging from 11.4% for Asian households to 23.4% for Native American households. In reporting denials, lenders are required to list at least one primary reason for denial and may list up to two secondary reasons. As Figure 5-3 demonstrates, a substantial proportion of denials occurred for no given reason. The primary basis for the rejection of 2,860 applications, or 23.1% of all denials, was left blank. This was even more prevalent in the denials for Black households, more than one-third of which (223 of 653) were rejected without a reported reason.

Figure 5-3
Primary Reason for Mortgage Denial by Household Race/Ethnicity, 2008-10

	Total	White	Black	Asian	Other	Hispanic	No Info
No reason reported	23.1%	23.3%	34.2%	15.1%	33.0%	25.2%	19.8%
Credit history	18.3%	17.3%	22.5%	10.5%	25.7%	23.6%	22.5%
Debt-to-income ratio	15.6%	16.0%	12.3%	19.4%	11.7%	18.4%	14.2%
Collateral	15.5%	16.1%	10.7%	19.0%	10.2%	13.0%	14.2%
Other	10.0%	10.1%	8.6%	11.7%	5.3%	7.3%	10.2%
Incomplete application	10.0%	9.7%	6.4%	13.6%	10.2%	6.4%	11.5%
Unverifiable information	4.2%	4.1%	2.3%	6.7%	1.5%	3.2%	4.9%
Insufficient cash	1.6%	1.7%	2.3%	1.0%	1.0%	1.3%	1.2%
Employment history	1.6%	1.6%	0.8%	2.7%	1.0%	1.3%	1.5%
Insurance denied	0.1%	0.1%	0.0%	0.3%	0.5%	0.1%	0.0%

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2008 to 2010

Observation

Mortgage loan denial rates among racial and ethnic minority applicants were higher than the denial rate for White applicants between 2008 and 2010.

Additionally, rejections for Black, Hispanic and Other Race applicants were less likely to be accompanied by a reason for denial.

For this analysis, lower-income households include those with incomes between 0%-80% of MFI, while upper-income households include households with incomes above 80% MFI. Applications made by lower-income households accounted for 33.2% of all denials between 2008 and 2010, though they accounted for only 24.1% of total applications for those three years.

Figure 5-4 distributes the denials by income level among racial and ethnic groups. Among lower-income households, denial rates were generally higher for minorities. While the overall lower-income denial rate was 17.1%, the denial rates for lower-income Blacks, Hispanics and households of Other race (consisting primarily of Native Americans) were 24%, 25.3% and 28.9%, respectively.



While denial rates were generally lower for upper-income households, differences persisted across racial and ethnic groups. The overall upper-income denial rate was 12%, compared to 18.4%, 21% and 21.9% for upper-income Hispanic, Other Race and Black households, respectively. Lower-income White households were less likely to experience denial than any of these three upper-income minority groups. This pattern is consistent with discrimination.

Figure 5-4
Denials by Race/Ethnicity and Income Level, 2008-10

		Total	White	Black	Asian	Other	No data	Hispanic*
Lower-Income	Total Applications	24,173	18,355	976	782	315	3,745	3,692
	Denials	4,129	2,977	234	148	91	679	933
	% Denied	17.1%	16.2%	24.0%	18.9%	28.9%	18.1%	25.3%
Upper-Income	Total Applications	64,385	46,936	1,754	4,173	537	10,985	5,370
	Denials	7,752	5,522	385	423	113	1,309	986
	% Denied	12.0%	11.8%	21.9%	10.1%	21.0%	11.9%	18.4%
Total	Total Applications	100,172	69,534	3,090	5,095	909	21,544	9,816
	Denials	12,401	8,819	653	583	206	2,141	2,001
	% Denied	12.4%	12.7%	21.1%	11.4%	22.7%	9.9%	20.4%

Note: Total also includes 11,614 applications for which no income data was reported.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2008 to 2010

> Observation

Over the course of the three years studied, upper-income minority households experienced denial rates that were higher than those of lower-income White households.

Among upper-income Black, Hispanic and Other Race (primarily Native American) households, mortgage denial rates were 21.9%, 18.4% and 21%, respectively, compared to a denial rate of 16.2% among lower-income Whites. While this fact alone does not imply an impediment to fair housing choice, the pattern is consistent with discrimination.

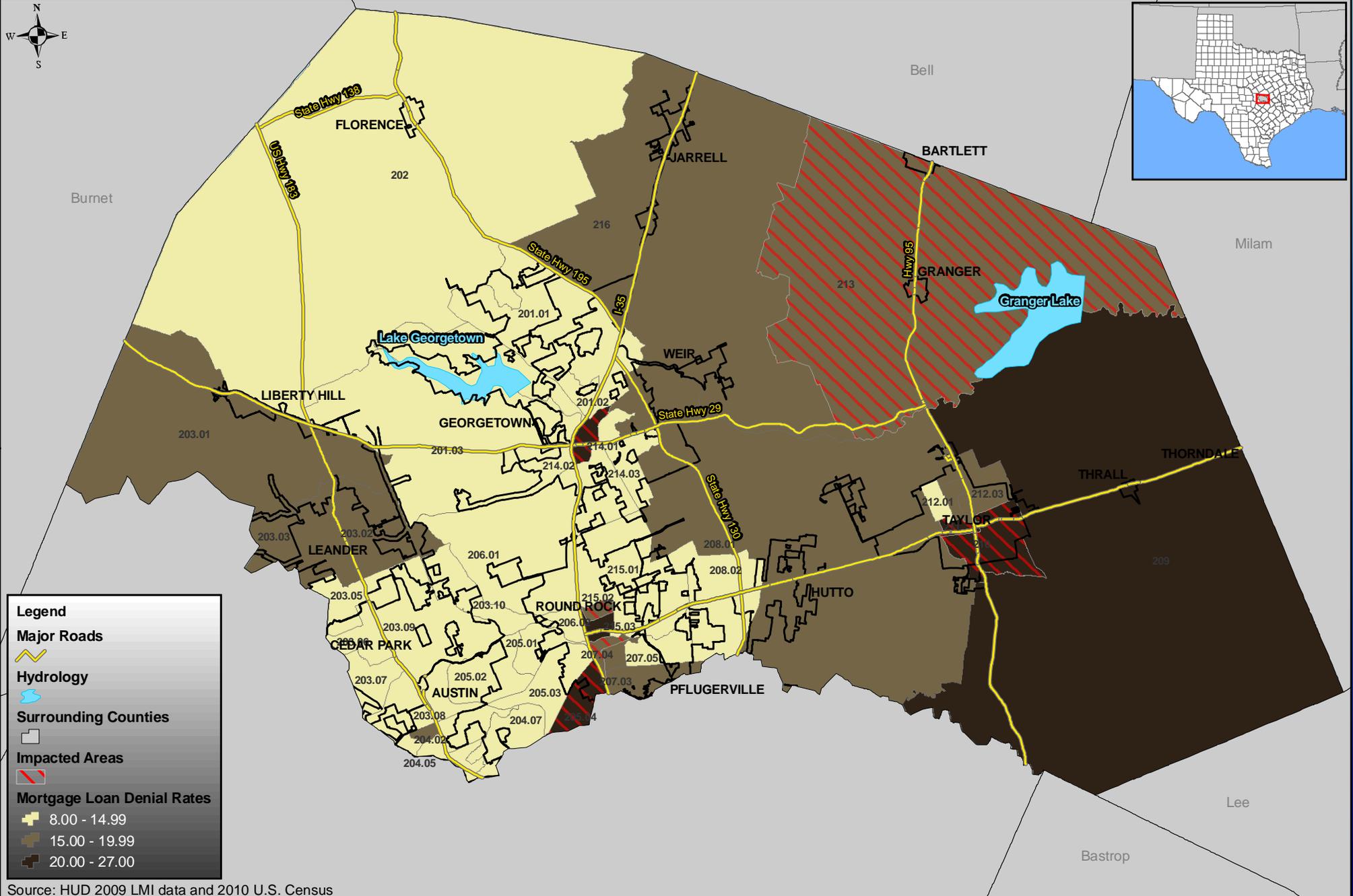
Denial rates by census tract across Williamson County are illustrated in the following map. Of the 46 total tracts within the county, six report denial rates exceeding 20%.

iii. High-Cost Lending

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling

Map 9: Mortgage Denial Rates, 2009

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on excessive fees, penalties and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, HMDA data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered “high-cost.”

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

Between 2008 and 2010, there were 44,713 home purchase, refinance or home improvement loans made for single-family or manufactured units in Williamson County. Of this total, 42,126 disclosed the borrower's household income and 2,540 reported high-cost mortgages. Overall, upper-income households were slightly less likely to have high-cost mortgages than lower-income households.

An analysis of loans in Williamson County by race and ethnicity reveals that minorities are overrepresented in high-cost lending. Among lower-income minority households, 8.6% of mortgages obtained by Blacks and 11.5% of those obtained by Hispanics were high-cost, compared to 6.4% of the mortgages obtained by lower-income White households and only 3.5% of those obtained by lower-income Asian households.

More parity was apparent among upper-income households. While Asian households were still the least likely to have high-cost mortgages (3.2%), the 5.8% high-cost rate for White households was more comparable to the 5.6% rate for Blacks and the 6.4% rate for Hispanics. Details appear in Figure 5-5.

Figure 5-5
High-Cost Loans by Race/Ethnicity and Income Level, 2008-10

		Total	White	Black	Asian	Other	No data	Hispanic*
Lower-Income	Total Originations	10,391	8,472	361	367	120	1,071	1,419
	High-Cost	657	546	31	13	9	58	163
	% High-Cost	6.3%	6.4%	8.6%	3.5%	7.5%	5.4%	11.5%
Upper-Income	Total Originations	31,735	24,602	710	2,354	238	3,831	2,395
	High-Cost	1,757	1,436	40	75	12	194	153
	% High-Cost	5.5%	5.8%	5.6%	3.2%	5.0%	5.1%	6.4%
Total	Total Originations	44,713	35,006	1,241	2,777	382	5,307	4,132
	High-Cost	2,540	2,085	78	89	22	266	331
	% High-Cost	5.7%	6.0%	6.3%	3.2%	5.8%	5.0%	8.0%

Note: Total also includes 2,587 loans for which no income data was reported.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2008 to 2010

➤ Observation

Lower-income Black and Hispanic households are more likely to receive high-cost mortgage loans than lower-income White or Asian households.

This trend places minority homeowners at greater risk for eviction, foreclosure and bankruptcy.

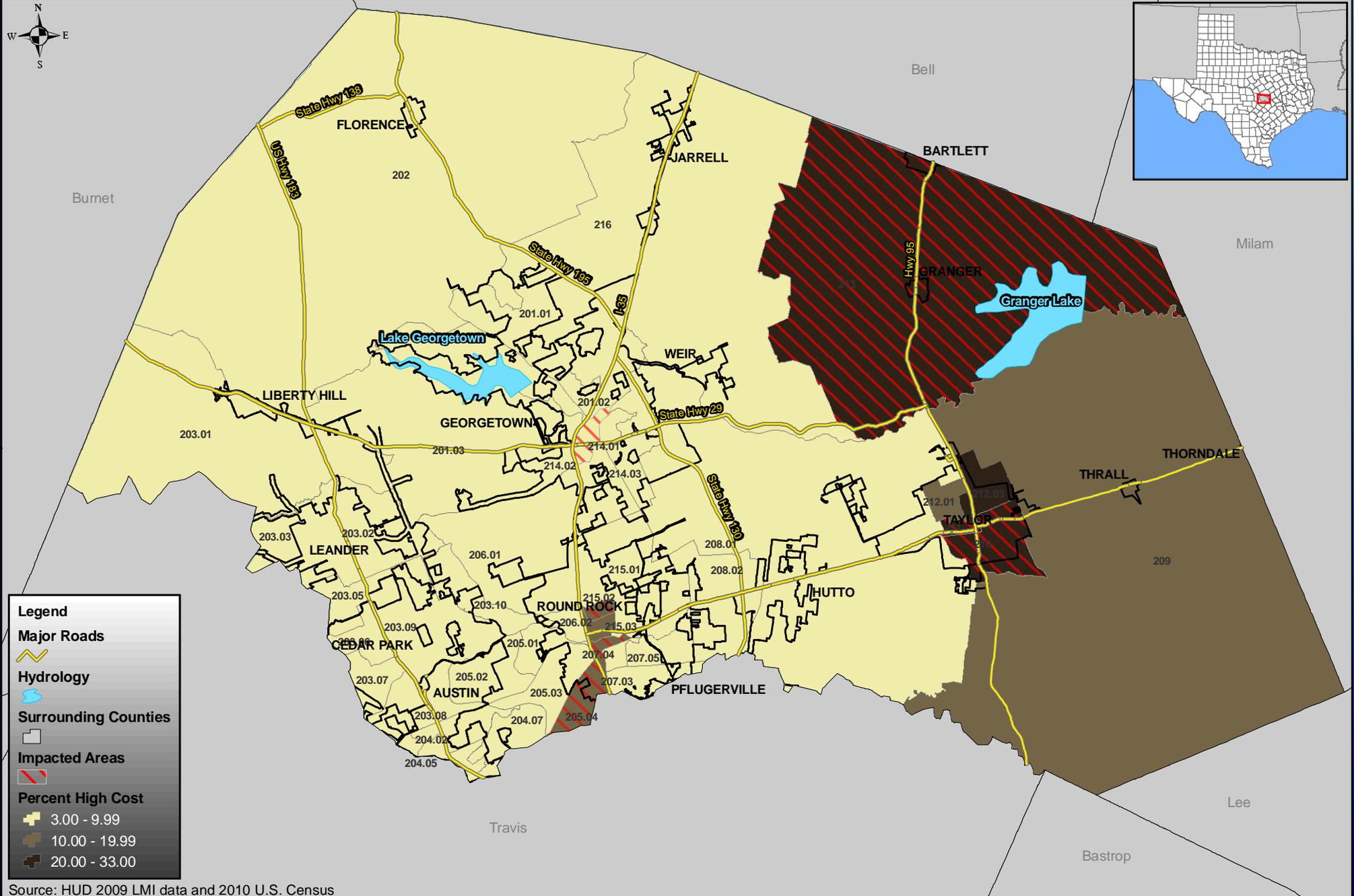
The distribution of high-cost loans by census tract across Williamson County is depicted on the following map. There are 12 tracts where high-cost mortgages constitute more than 10% of all mortgage loans, including four tracts where at least one in every five loans is high-cost.

iv. Annual Trends

Studying mortgage application data on an annual basis allows insight into the influence of housing market trends on the behavior of applicants and banks. Figure 5-6 illustrates annual change.

Map 10: Percentage of High Cost Mortgages, 2009

Analysis of Impediments to Fair Housing Choice. Williamson County, TX



Source: HUD 2009 LMI data and 2010 U.S. Census

Figure 5-6
Mortgage Application Loan Results by Year, 2008-10

	2008		2009		2010	
	#	%	#	%	#	%
Total loans						
Applied for	30,341	100.0%	37,130	100.0%	32,701	100.0%
Black	1,048	3.5%	1,093	2.9%	949	2.9%
White	20,871	68.8%	25,280	68.1%	23,383	71.5%
Asian	1,404	4.6%	1,867	5.0%	1,824	5.6%
Hispanic*	3,405	11.2%	3,370	9.1%	3,041	9.3%
Other race	360	1.2%	304	0.8%	245	0.7%
No information/NA	6,658	21.9%	8,586	23.1%	6,300	19.3%
Originated	13,031	42.9%	16,408	44.2%	15,274	46.7%
Black	394	37.6%	444	40.6%	403	42.5%
White	10,210	48.9%	12,839	50.8%	11,957	51.1%
Asian	696	49.6%	1,059	56.7%	1,022	56.0%
Hispanic*	1,363	40.0%	1,421	42.2%	1,348	44.3%
Other race	141	39.2%	133	43.8%	108	44.1%
No information/NA	1,590	23.9%	1,933	22.5%	1,784	28.3%
Originated - High Cost	1,074	8.2%	892	5.4%	574	3.8%
Black	41	10.4%	25	5.6%	12	3.0%
White	868	8.5%	741	5.8%	476	4.0%
Asian	35	5.0%	30	2.8%	24	2.3%
Hispanic*	166	12.2%	95	6.7%	70	5.2%
Other race	9	6.4%	11	8.3%	2	1.9%
No information/NA	121	7.6%	85	4.4%	60	3.4%
Denied	4,556	15.0%	3,779	10.2%	3,798	11.6%
Black	271	25.9%	196	17.9%	186	19.6%
White	3,242	15.5%	2,586	10.2%	2,722	11.6%
Asian	191	13.6%	191	10.2%	201	11.0%
Hispanic*	839	24.6%	627	18.6%	535	17.6%
Other race	95	26.4%	69	22.7%	42	17.1%
No information/NA	757	11.4%	737	8.6%	647	10.3%

Note: Data is for home purchase, refinance and improvement loans for owner-occupied one-to-four family and manufactured units. Other application outcomes include approved but not accepted, withdrawn, incomplete or purchase by another institution.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2008-10

While housing markets across the country have experienced steep declines in sales volume and mortgage applications since 2008 as a result of buyer reluctance in an unstable market, the number of applications in Williamson County bounced from 30,341 in 2008 to 37,130 in 2009 before settling at 32,701 in 2010. This supports the notion suggested by local home sales rates that the county was somewhat insulated from the national housing market crisis, having never hit an inflated market high from which it could precipitously fall. In addition to strong demand for property by families relocating out of Austin, the stable mortgage application numbers also potentially reflect the record-low interest rates of 2009 and 2010.

Over the course of the three years studied, the percentage of applications that resulted in loan originations increased, on the whole and across all racial and ethnic groups. The number of loans that were high-cost



dropped substantially each year, likely as a direct result of increasing statutory control over predatory lending practices. It is also possible that education and outreach related to borrowing has contributed to the decline in high-cost loans. Between 2008 and 2010, the proportion of applications resulting in denials declined from 15% to 11.6%. This change also occurred across all minority groups.

> Observation

Between 2008 and 2010, high-cost lending rates dropped substantially, on the whole and across all racial and ethnic groups.

This is likely a direct result of increased statutory control over predatory lending practices, as well as increasing borrower awareness.

B. Real Estate Practices

Williamson County is served by the Williamson County Association of Realtors (WCAOR), a nonprofit trade organization that also serves neighboring Travis County. WCAOR functions as the local arm of the Texas Association of Realtors and the National Association of Realtors.

In order to become licensed by the Texas Real Estate Commission, the state's licensing authority, real estate salespeople must complete a specific set of pre-licensure courses, including real estate principles, law and other areas. Coverage of the Fair Housing Act is specifically included in an elective course that may be counted for credit, but is not a listed component of the core educational requirement courses. WCAOR new member orientation, which must be taken within 90 days of licensing, includes a one-hour fair housing component taught by a Realtor.

State law requires that each licensed salesperson must accumulate 15 classroom hours of continuing education, six of which are in legal/ethics topics, every two years. As part of the continuing education classes, licensees can elect to receive fair housing training. Fair housing classes are taught by education providers licensed through the Texas Real Estate Commission. There are also optional and continuing education courses available online through the National Association of Realtors and the Texas Association of Realtors.

Anyone may file a complaint alleging a breach of ethics on the part of a member. All complaints are reported directly to the Texas Real Estate Commission, not handled at the peer level by an appointed WCAOR grievance committee, in order to avoid undue liability and potential conflicts of interest. Only one board of Realtors in the state of Texas handles its own professional standards complaints. However, the practice is commonplace in other states.

During interviews conducted during the development of the AI, WCAOR members reported that they are very conscious of Fair Housing Law and prohibited practices, such as steering. Members refer clients with sensitive questions on neighborhood features to sources of impartial data. For example, a client who asks about school quality would be referred to comparative information maintained by the Texas Rural Education Association.

WCAOR has sponsored an all-day seminar three times in recent years to allow members to attain certification as Texas Affordable Housing Specialists. The seminars educate members on all aspects of meeting the needs of lower-income buyers.

Williamson County has an active Association of Hispanic Real Estate Professionals that offers programs to assist both Hispanic real estate professionals and the greater Hispanic community. Twice annually, this organization hosts a seminar to assist Hispanic households in navigating the process of home buying.

C. Real Estate Advertising

Under federal law, no advertisement with respect to the sale or rental of a dwelling may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status or national origin. In addition, Texas law extends protection to persons based on ancestry, guide dogs or support animals, age (40 and above), pregnancy, and the disability of an individual with whom the person is known to have a relationship or association.

Publishers and advertisers are responsible under federal law for making, printing, or publishing advertisements that violate the Fair Housing Act on its face. Thus, they should not publish or cause to be published an advertisement that expresses a preference, limitation or discrimination on the basis of race, color, religion, sex, handicap, familial status, or national origin. The law, as found in the Fair Housing Amendments Act of 1988, describes the use of words, photographs, symbols or other approaches that are considered discriminatory.

The real estate sections of the Sunday, October 2, 2011 edition of the *Williamson County Sun* was reviewed to identify impediments to housing choice within the published advertisements for houses and other dwelling units held out for sale or for rent. A search of the advertisements showed that most – but not all – of the advertisers showed the Equal Housing Opportunity or Equal Housing Lending logo. The publisher’s notice and the newspaper’s policies on accepting and printing real estate ads were included. In the hundreds of for-sale and rental ads reviewed, there were no instances of blatantly discriminatory language.

Interviews with local housing advocates indicated that discriminatory real estate advertisements have appeared in locally circulated “green sheets,” a broad term applying to both a publication by that name and other free circulars advertising homes for sale and rent. Austin Tenants Council has filed complaints against discriminatory advertisers that have resulted in settlements requiring fair housing training and the provision of free ad space to ATC.

A review of The Greensheet for November 10-16, 2011, revealed no blatantly discriminatory language in rental or sales ads. Under the heading “A Note to Readers,” The Greensheet stated its publisher’s policy related to fair housing, including the statement that “The Greensheet will not knowingly accept any advertisement which violates [the Fair Housing Act of 1989].” A handful of ads stated a preference for no felons, but as felon status is not a basis protected by federal, state or local discrimination law, this type of discrimination is lawful.

➤ Observation

Discrimination has been noted to appear in real estate advertisements in locally circulated “green sheets” and appearing in unregulated online listings.

Recourse against mediums unfiltered by a publisher, such as Craigslist, are difficult, but the responsibility of publications such as newspapers and “green sheets” to uphold the advertising requirements of the Fair Housing Act are clear. The County should continue to monitor the activity of housing advocates in relation to discriminatory local advertising and, if necessary, send letters to publishers reminding them of their responsibilities under the Act.

6. Evaluation of Current Fair Housing Profile

A. Fair Housing Policies and Actions since the Previous AI

This document is Williamson County's first Analysis of Impediments to Fair Housing Choice, representing the county's recognition that the need to affirmatively further fair housing extends beyond its statutory responsibility to uphold the tenets of the federal Fair Housing Act and the Texas Fair Housing Act. This AI is the result of a comprehensive effort to identify and contextualize barriers to fair housing. Additionally, it provides a specific course for action with the ultimate goal of equalizing housing opportunities for all people. The county will use the AI's recommendations as a pattern for the implementation of fair housing initiatives, then will record fair housing accomplishments in each year's CAPER.

B. Current Fair Housing Activities

The county's efforts to affirmatively further fair housing are currently characterized by its CDBG investment in the installation and improvement of infrastructure to facilitate the development of affordable housing in a variety of communities. This approach is a reflection of the limited federal resources available to the county to meet local needs for decent, affordable housing and sustainable, safe and healthy living environments. The county does not receive HOME funds, which would provide for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. Therefore, it allocates CDBG dollars toward water, sewer, sidewalk, street and other projects in areas where they will complement housing initiatives or otherwise serve lower-income households.

Additionally, the county has supported affordable housing projects undertaken by other agencies:

- The county works with Habitat for Humanity and recently allocated funds for Habitat to purchase lots upon which it could build housing for an eligible lower-income family. Habitat has homes in Round Rock, Taylor and Georgetown. During AI interviews, Habitat staff members reported encountering no real neighborhood pushback on proposals to build affordable owner housing units. However, the cost of land in Williamson County is generally formidable. The local Habitat organization recently raised its client income limit to 30-60% of the local median income from 30%-50% to reflect the area's high housing costs.
- The county lent CDBG support in two consecutive years to Georgetown Housing Authority's proposed tax credit project, Sierra Ridge, including the up-front costs of planning and engineering. However, the project has been cancelled as an indirect result of neighborhood opposition and downfall in the economy. The Authority has begun refunding the county's CDBG investment. According to staff members, the county has not been directly approached to date to support a tax credit project. Stakeholders interviewed during the development of the AI cited a general sense among city elected officials that there is already a "fair share" of tax-credit housing in Georgetown, as the city has between six and eight developments of this type.

This example of not-in-my-backyard (NIMBY) attitudes was not the only example raised by fair housing stakeholders during AI interviews. In Leander, Williamson-Burnett County Opportunities (WBCO) faced opposition to a proposed 152-unit affordable housing complex, Cedar Ridge, about eight years ago when neighbors of the site envisioned it becoming “the projects.” WBCO staff members reported that the city permitting and approvals process seemed more difficult for this project than it might have been for a market-rate development. Eventually, the city and neighborhood became supportive.

WBCO staff members reported that the agency would like to replicate the success of Cedar Ridge in the eastern end of the county.

➤ Observation

Not-in-my-backyard attitudes have threatened the development of affordable housing by public and nonprofit agencies on more than one occasion.

Negative public perception about assisted rental housing, particularly for families, has become a primary concern among agencies that would create new housing opportunities for lower-income households.

C. Advocacy Organizations

Only one fair housing advocacy organization serves the Urban County and its municipalities. The Austin Tenants Council (ATC), based in neighboring Travis County, is a HUD-certified counseling agency that participates in HUD’s Fair Housing Initiatives Program (FHIP), through which ATC partners with HUD to help people identify government agencies that handle complaints of housing discrimination. Additionally, the Council conducts fair housing and outreach activities in Travis County and conducts discrimination testing across Central Texas.

The Council currently does not have a contract with Williamson County to provide landlord-tenant services or fair housing education and outreach. However, the Council accepts and processes fair housing complaints originating in Williamson County. Callers from the county who need landlord-tenant counseling are turned away due to the agency’s budget limitations.

➤ Observation

Approximately one year ago, Austin Tenants Council retracted landlord/tenant counseling and fair housing education and outreach activities from Williamson County and surrounding counties due to funding concerns.

At an estimated annual cost of \$10,000 to \$20,000, the county should consider restoring full fair housing services from ATC or an equally qualified provider.

7. General Fair Housing Observations

This section of the AI is a summary of general observations included in earlier sections of the report. General observations include the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning in the Urban County. These observations in and of themselves do not necessarily constitute impediments to fair housing choice. Rather, they establish a contextual framework for the impediments to fair housing choice that are presented in the following section of the AI.

A. Demographic and Housing Market Observations

- i. Population growth in the Urban County continues to significantly outpace statewide averages. This growth has resulted in a continuous demand for housing.
- ii. Racial minorities increased from 12.6% to 21.8% of the total Urban County population between 1990 and 2010. Hispanics remain the largest minority group. However, the fastest-growing segment of the population has been Asian/Pacific Islanders, which increased 1008%.
- iii. There are 22 areas of minority concentration within the Urban County. Concentrations of Black residents occur in the southern portion of the county in Round Rock and Taylor. Concentrations of Asian residents occur in the Austin City portion within the county, and concentrations of Hispanic residents can be found in the Round Rock and southern Georgetown areas.
- iv. Twenty-one areas of the Urban County include concentrations of both low-moderate income persons and minorities. Within the Urban County, these impacted areas are located in Georgetown, Granger, Taylor, Pflugerville and south of Pflugerville. Additionally, impacted areas occur in the incorporated city of Round Rock.
- v. The Urban County is moderately segregated, with a 2010 Black/White index of 31.9. According to this statistic, 31.9% of Black persons would have to move to a different location in the county in order to achieve full Black-White integration.
- vi. Black households and Hispanic households were more likely to have lower incomes than Whites across the Urban County and were disproportionately represented among lower-income households. Lower household incomes among Blacks and Hispanics are reflected in lower home ownership rates when compared to Whites and Asians. Among minorities in the county, 53.5% of Blacks and 52.4% of Hispanics were home owners, compared to 78.6% of Whites and 60.7% of Asians.
- vii. Persons with disabilities were nearly twice as likely to live in poverty as persons without disabilities. Among county residents age five and older with a disability in 2010, 11.8% lived in poverty, compared to 7.6% of persons without disabilities.
- viii. Female-headed households with children accounted for almost 60% of all families living below the level of poverty in the county. Female-headed households with children comprised 59.6% of all families living in poverty and were much more likely to live in poverty as married-couple families



with children.

- ix. Asians and Blacks were substantially more likely than Whites to be unemployed in the county in 2010. Nearly 12% of Asians and 13% of Blacks were unemployed in 2010, compared to 8.6% of Whites.
- x. The greatest gain in housing units since 2000 has occurred in the county's southern and central areas, including the communities of Cedar Park, Hutto, Round Rock and Georgetown.
- xi. Renter-occupied multi-family units represented only 16.3% of the occupied housing stock in the county in 2009. In nearly half of the county's tracts, multi-family rental units comprised less than 10% of all housing stock. Housing choice for lower-income households is restricted by an inadequate supply of affordable multi-family rental housing units in non-impacted areas. A lack of larger rental units consisting of three or more bedrooms has a disproportionately greater impact on minority families, who tend to live in larger families.
- xii. Lower-income Black renters and lower-income Black homeowners experienced housing problems at greater rates than Whites and Hispanics. Among renter households, almost three-quarters of Blacks had housing problems, compared to 62.7% of Whites and 66% of Hispanics.
- xiii. Housing affordability continues to be a problem:
 - Between 1990 and 2009, real median housing value increased 45.6% in the Urban County, while real household income grew only 15.9%. The result of this gap is a decline in the number of individuals and families that can afford to purchase a home.
 - The county lost one-third of its units renting for less than \$500 per month between 2000 and 2010. At the same time, there was a substantial increase renting for more than \$1,000 per month.
 - Minimum-wage and single-income households cannot afford a two-bedroom housing unit renting for the HUD fair market rent in Williamson County. Persons with disabilities receiving a monthly SSI check for \$674 as their sole source of income cannot afford a one-bedroom unit renting at the fair market rate of \$791.

B. Other Observations

- i. The county focuses its limited CDBG entitlement funds primarily in water, sewer, street, sidewalk and similarly eligible infrastructure installation and improvement projects in an effort to facilitate the development of affordable housing while improving the suitable living environment in a variety of areas.
- ii. Between 2008 and 2010, high-cost lending rates dropped substantially, on the whole and across all racial and ethnic groups. This is likely a direct result of increased statutory control over predatory lending practices, as well as increasing borrower awareness.
- iii. Land-use control over unincorporated areas commonly takes the form of deed/covenant restrictions. In Williamson County, these contracts between buyer and developer are often similar to zoning criteria and are, according to county staff members, very prevalent. The county does not have authority over the composition or application of subdivision restrictions, though it makes some of them available for download on its website. County staff observed that discriminatory language may still exist in older restrictive deeds/covenants, though provisions in violation of local, state or federal law cannot be enforced.



8. Potential Impediments to Fair Housing Choice

A. Public Sector

i. **Fair housing complaints data demonstrates that housing discrimination persists in Williamson County.**

Across Williamson County, race and disability were the primary bases for fair housing complaints to both HUD and the Texas Workforce Commission Civil Rights Division between 2005 and 2010. More than two-thirds of all fair housing complaints involved issues of race, disability or both. The prevalence and variety of housing discrimination complaints across Williamson County justify the need for continued real estate testing and amplified education and outreach efforts, especially as they relate to the rights of disabled individuals and the corresponding responsibilities of landlords.

Approximately one year ago, Austin Tenants Council retracted landlord/tenant counseling and fair housing education and outreach activities from Williamson County and surrounding counties due to funding concerns. At an estimated annual cost of \$10,000 to \$20,000, the county should consider restoring full fair housing services from ATC or an equally qualified provider.

Pure fair housing activities do not currently factor into the county's annual CDBG budget. However, the county is open to the possibility of engaging a qualified subrecipient to provide fair housing services in Williamson County.

Proposed Action Step: The County should consider an annual allocation equivalent to 1% of its CDBG budget for pure fair housing activities, such as education, outreach, testing and enforcement.

ii. **It is unclear whether local units of government that participate in the Urban County's entitlement grant program unequivocally understand their responsibility to affirmatively further fair housing choice.**

Although each of the zoning ordinances reviewed were noted to permit housing types that might be affordable, the amount of land zoned for the development of multi-family housing was minimal. Taylor's requirement of masonry veneers on all multi-family and manufactured dwellings increases the cost of these potentially affordable types of development, potentially deterring their location in the city. Additionally, Taylor restricts the number of unrelated persons who can live together as a family in such a way that it limits the number of persons who can reside in a group home for persons with disabilities, a policy that is inconsistent with the Fair Housing Act.

Not-in-my-backyard attitudes have threatened the development of affordable housing by public and nonprofit agencies on more than one occasion. Negative public perception about assisted rental housing, particularly for families, has become a primary concern among agencies that would create new housing opportunities for lower-income households.

The County could strengthen its annual certification to affirmatively further fair housing by adopting a policy to deny CDBG funding to municipalities that are identified as having discriminatory zoning or land use policies. Given the clarification on HUD's expectations of urban counties in the recent Westchester case, it is important for the county to protect against violations of its certification to affirmatively further fair housing.

Proposed Action Step: The County should prepare and distribute a letter to grantees clarifying zoning best practices as they relate to fair housing, with particular reference to allowing opportunities for the development of affordable housing types and avoiding discrimination against group homes for persons with disabilities.

Proposed Action Step: The CDBG Office should adopt a written policy of refusing to grant CDBG funds to municipalities that it determines are engaging in unlawful discrimination. The county could extend this policy to apply to all of the grants it awards to municipalities, including those from non-CDBG sources.

Proposed Action Step: The County currently requires all CDBG recipients to certify that they will affirmatively further fair housing. This practice should continue.

iii. **The results of testing in Williamson County indicate that newly constructed multi-family rental properties do not always comply with the applicable design and construction standards for accessibility required by law.**

Instead of potentially noncompliant features being identified during the initial phases of building, housing advocates for persons with disabilities reported that noncompliant features are often identified through the fair housing complaints process post-construction. The absence of local oversight over the design and construction of new residential structures is one possible reason for reported instances of noncompliance with federal and state accessibility requirements.

Proposed Action Step: The County should play a stronger role in ensuring that multi-family housing developments, as they are proposed, are reviewed by the appropriate city or state agency for compliance with accessibility laws.

iv. **It is unclear whether Spanish-speaking residents with limited English proficiency have adequate access to county programs and services.**

In Williamson County, there are more than 17,612 speakers of Spanish



who have limited proficiency in speaking English, a number that comprises more than 5% of the county's total population age five and over.

Proposed Action Step: The CDBG Office should evaluate the extent to which County programs and services meet the needs of populations with limited English proficiency by conducting the four-factor analysis.²¹

v. **Some of the policy documents used by Williamson County and local public housing authorities in the administration of housing programs could be improved, from a fair housing perspective.**

The Georgetown Housing Authority's Housing Choice Voucher Administrative Plan has an anti-discrimination policy that applies much more broadly than the same policy in its public housing Admissions and Continued Occupancy Policy.

In the absence of a countywide comprehensive plan that informs land use or housing, the county must find other means of making clear its commitment to affirmatively further fair housing.

The CDBG Office should evaluate the prevalence of persons with limited English proficiency being served by Urban County programs and consider conducting a regional four-factor analysis to determine whether a Language Access Plan is warranted.

Proposed Action Step: The County should take steps to ensure that its fair housing policy extends to all aspects and departments of county government, not just its HUD programs. The CDBG office should create and take advantage of opportunities to educate department heads and elected officials on the county's responsibility to affirmatively further fair housing.

Proposed Action Step: The County should encourage the Georgetown Housing Authority to protect the same classes from discrimination in both its Housing Choice Voucher and public housing programs.

vi. **Williamson County is not served by a large, fixed-route transit provider.**

Participation in Austin's Capital Metro service area requires jurisdictions to levy a 1% sales tax, which has proven prohibitive for Williamson County municipalities. None currently participate. A fixed-route transit system could significantly improve employment opportunities for lower-income persons who typically rely on public transit to access jobs, thus increasing their

²¹ The four-factor analysis is detailed in the *Federal Register* dated January 22, 2007.

potential success for better housing. The lack of transit service in these communities presents a barrier to the development of affordable housing.

Proposed Action Step: In its Long-Term Transportation Plan, the county has acknowledged the growing need for public transportation options and proposed routes that would best serve its communities. The county should advocate for the development of public transit and, as opportunities arise, provide funding.

Proposed Action Step: The County should continue to lobby Capital Metro and other relevant agencies in request of transit connections that would provide lower-income residents access to job-rich areas.

vii. Housing Choice Voucher holders have limited housing options outside of impacted areas.

The rental market in Williamson County is tight, with occupancy rates exceeding 95%, according to the local Association of Realtors. Contributing factors to this trend include an influx of families who are moving to the county from Austin in search of cheaper housing, less crime and better schools, increased pressure on the rental market as a result of foreclosures and buyer reluctance to initiate mortgage loans, and the destruction of some properties due to natural disaster. Intense competition for rental housing puts voucher holders at a disadvantage, as landlords may discriminate against voucher holders in selecting tenants.

HUD imposes a fair market rent level that can be paid for Housing Choice Voucher units, allowing housing authorities to set their payment standards between 90% and 110% of that threshold. The Georgetown Housing Authority pays up to 110% of the fair market rent. HUD allows housing authorities to apply for an increase in payment standard up to 120%. In many areas of Williamson County, the HUD fair market rent is insufficient to afford a unit.

Three of the four housing authorities within the jurisdiction of this report declined to participate in its development. Therefore, is unclear whether the policies of these agencies advance or obstruct fair housing aims.

Proposed Action Step: The County should seek to engage all four housing authorities in discussions related to countywide fair housing issues, to include an evaluation of portability between jurisdictions and comparison of payment standards, with the eventual goal of securing participation by all agencies in the next AI.



B. Private Sector

- i. **Mortgage lending data from 2008 to 2010 suggests that racial minorities are more likely to experience mortgage application denial or high-cost lending than White applicants.**

Across the three years studied, the loan denial rates among racial and ethnic minority applicants were higher than the denial rate for White applicants. Additionally, rejections for Black, Hispanic and Other Race applicants were less likely to be accompanied by a reason for denial.

Upper-income minority households consistently experienced denial rates that were significantly higher than those of *lower-income* White households. While this fact alone does not imply an impediment to fair housing choice, the pattern is consistent with discrimination. This is an extremely common observation among markets across the U.S. during the years 2008 to 2010.

Lower-income Black and Hispanic households were disproportionately represented among recipients of high-cost mortgage loans. This trend places minority homeowners at greater risk for eviction, foreclosure and bankruptcy.

Proposed Action Step: The County should evaluate the extent to which housing counseling is available to provide credit repair advice to members of the protected classes, to ensure to the extent possible that they have access to means of improving their ability to obtain and maintain decent, affordable housing. In the case that counseling is unavailable, inadequate or not well advertised, the county should work with its community partners to increase its availability and use.

- ii. **Discrimination has been noted to appear in real estate advertisements in locally circulated “green sheets” and appearing in unregulated online listings.**

While little recourse is available for online listings that are directly published by advertisers – and therefore not passed through an editorial filter – housing complaints can be filed and investigations initiated against discriminatory advertisers. Green sheets are subject to the publication laws of any newspaper and, by publishing discriminatory material, violate the Fair Housing Act.

Proposed Action Step: The County should continue to monitor the actions of advocacy groups relative to discriminatory advertising and, in the case of discrimination, distribute a letter to publishers to inform them of their responsibilities under the Fair Housing Act.

9. Fair Housing Action Plan

Williamson County Implementation Schedule for AI Fair Housing Action Plan

	Planned Action Year				
	2012	2013	2014	2015	2016
Goal: Establish a foundation for affirmatively furthering fair housing across all County programs.					
Task: Take steps to ensure that the County's fair housing policy extends to all aspects and departments of County government, not only HUD programs. The CDBG Office should create and take advantage of opportunities to educate department heads and elected officials on the County's responsibility to affirmatively further fair housing.	•	•	•	•	•
Task: The County should play a stronger role in ensuring that multi-family housing developments, as they are proposed, are reviewed by the appropriate agency for compliance with accessibility laws.	•	•	•	•	•
Goal: Increase access to County programs for persons with limited English proficiency.					
Task: Complete four-factor analysis of needs and language access plan according to HUD's LEP guidance		•			
Goal: Increase the supply of housing affordable to households below 80% MHI, specifically in opportunity areas.					
Task: Continue to seek and support opportunities to expand affordable housing options, particularly in areas outside of racial/ethnic concentration.	•	•	•	•	•
Goal: Deepen awareness of fair housing responsibilities among communities participating in the CDBG program.					
Task: Prepare and distribute a letter to grantees clarifying zoning best practices as they relate to fair housing, with particular reference to allowing opportunities for the development of affordable housing types and avoiding discrimination against group homes for persons with disabilities.	•				
Task: The CDBG Office should adopt a written policy of refusing to grant CDBG funds to municipalities that it determines are engaging in unlawful discrimination. The County could extend this policy to apply to all of the grants it awards to municipalities, including those from non-CDBG sources.	•				
Task: Continue to require all CDBG recipients to certify that they will affirmatively further fair housing.	•	•	•	•	•



	Planned Action Year				
	2012	2013	2014	2015	2016
Goal: Engage local housing authorities in cooperative efforts to affirmatively further fair housing.					
Task: Seek to engage all four PHAs in discussions related to countywide fair housing issues, to include an evaluation of portability between jurisdictions and comparison of payment standards, with the eventual goal of securing participation by all agencies in the next AI			•	•	•
Task: Encourage the Georgetown Housing Authority to protect the same classes from discrimination in both its voucher and public housing programs		•			
Goal: Invest in directly addressing fair housing issues					
Task: Consider an annual allocation equivalent to 1% of the County's CDBG budget for pure fair housing activities, such as education, outreach, testing and enforcement		•			
Goal: Mitigate the extent to which mortgage loan denials and high-cost lending disproportionately affect minorities					
Task: Evaluate the extent to which housing counseling is available to members of the protected classes. In the case that counseling is unavailable, inadequate or not well advertised, the County should work with its community partners to increase its availability and use.	•	•	•	•	•
Goal: Increase transit connections between lower-income areas and jobs					
Task: The County should advocate for the development of public transit to serve the needs identified in the LTTP, and, as opportunities arise, provide funding	•	•	•	•	•
Task: Continue to lobby Capital Metro and other relevant agencies in request of transit connections that would provide lower-income residents access to job-rich areas	•	•	•	•	•
Goal: Mitigate discrimination in real estate advertising					
Task: Continue to monitor the findings of advocacy groups relative to discrimination in real estate ads. In the event of discrimination, distribute a letter to publishers to inform them of their responsibilities under the Fair Housing Act	•	•	•	•	•



10. Signature Page for the Urban County

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Urban County of Williamson County is in compliance with the intent and directives of the regulations of the Community Development Block Grant program.

(Signature of Authorizing Official)

Date

Appendix

Stakeholder Chart

Stakeholder Chart
 Consultation Process for the
 Williamson County, TX Analysis of Impediments to Fair Housing Choice

Type of Organization	Contact Name	Title	Name of Organization	Mailing Address	Telephone	Email Address
County CDBG Program (questionnaire & interview)	Sally Bardwell	Grants Coordinator	Williamson County	710 Main St Georgetown, TX 78626	512.943.3757	sbardwell@wilco.org
County Planning / Zoning Director (questionnaire & interview)	Bob Daigh	Senior Director of Infrastructure	Williamson County	3151 SE Inner Loop, Ste 3 Georgetown TX 78626	512-943-3330	bdaigh@wilco.org
County Building Codes Official (questionnaire & interview)	Joe England	County Engineer	Williamson County	3151 SE Inner Loop, Ste 3 Georgetown TX 78626	512-943-3336	jengland@wilco.org
Public Housing Authorities (questionnaires; one focus group)	Nikki Brennan	Executive Director	Georgetown Housing Authority	210 West 18th St Georgetown, TX 78626	512.863.5565	nikki.nrennan@georgetownha.org
	Kathi Hirtz	Section 8 Manager		501 E. Janis Drive Georgetown, TX 78628	512-869-6918	kathy.hirtz@georgetownha.org
	Deborah Williams	Executive Director	Round Rock Housing Authority	PO Box 781 Round Rock, TX 78681	512-255-3702	
		Section 8 Manager		PO Box 781 Round Rock, TX 78681	512-255-1336	
		Executive Director	Thorndale Housing Authority	306 E Umlang St Thorndale, TX 76577	512.898.2777	tha301@austin.rr.com
		Section 8 Manager				
		Executive Director	Taylor Housing Authority	311 C. East 7th Taylor, TX	512.352.3231	thousingauth@austin.rr.com
		Section 8 Manager				
	Executive Director	Granger Housing Authority	500 N. Commerce St, Ste 28 Granger, TX 76530	512.859.2797	grangerha@thegateway.net	
Affordable Housing Providers, CHDOs (questionnaires; one focus group)	Jennifer Bills	Housing Coordinator	City of Georgetown	300-1 Industrial Georgetown, TX 78627	512.930.8477	jennifer.bills@georgetown.org
	Debbie Hoffman	Executive Director	Habitat for Humanity	POB 737 Georgetown, TX 78626	512.863.4344	debbieh@williamsonhabitat.org
	Liz Alvarado		Round Rock CDBG	221 East Main Street Round Rock, TX 78664	512-341-3328	laivarado@round-rock.tx.us
	Jim Ormand	Executive Director	Front Steps	PO Box 684519 Austin, TX 78768-4519	512-305-4100	
	Kathy Stark	Executive Director	Austin Tenants' Council	1640-B East 2nd Street, Suite 150 Austin, TX 78702	512-474-1961	
	Jim Shaw	Executive Director	Capital Area Housing Finance Corporation	4101 Parkstone Heights Drive Austin, TX 78746	512.347.9903	jshaw@cahfc.org
Advocacy Organizations for Persons with Disabilities (questionnaire; one focus group)	Sally Decker	Independent Living Skills Coordinator	ARCIL Williamson County Consumer Housing Coalition	525 Round Rock West, Suite A120 Round Rock, TX 78681	512-828-4624	sally@arcil.com
	Andrea Richardson	Executive Director	Bluebonnet Trails MHMR	1009 N. Georgetown Street Round Rock, Texas 78664	512-244-8335	angie.miller@bluebonnetmhmr.org
	Rachel Griffin	CDSA Coordinator	Coalition of Texans with Disabilities		512.236.1070	rgriffin@cotwd.org
	Chase Bearden		Coalition of Texans with Disabilities	316 W. 12th Street Ste. 405 Austin, Texas 78701	(512) 478-3366	cbearden@cotwd.org
Advocacy Organizations for Persons with LEP (questionnaire; one focus group)	Gloria Perez-Walker		Latina Mami	P.O. Box 140674 Austin, TX 78714	512-494-7758	info@latinamami.org
	Channy Soeur	President	Network of Asian American Organizations	3432 Greystone Drive Austin, TX 78731	(512) 407-8240 ext.302	
Williamson County Association of Realtors (interview)		Executive Director	Williamson County Association of Realtors	123 E. Old Settlers Blvd Round Rock, TX 78664	512-255-6211	
Public transit agency (questionnaire; one focus group)		General Manager	CARTS (Capital Area Rural Transit System)	PO Box 6050 Austin, TX 78762	512-505-5678	
	John Michael Cortex		CapMetro			john-michael.cortex@capmetro.org
Local human rights organizations, legal aid agencies (questionnaires; one focus group)		Executive Director	Austin Area Urban League	8011-A Cameron Road, Ste 100 Austin TX 78754	512.478.7176	info@aauul.org
	Terri Burke	Executive Director	ACLU of Austin	P.O. Box 12905 Austin, TX 78711-2905	512-478-7300	info@aclutx.org
	Scott McCown	Executive Director	Center for Public Policy Priorities	900 Lydia Street Austin, TX 78702	512-320-0222	mccown@cppp.org
	Leslie Janca	Executive Director	The Georgetown Project	P.O. Box 957 Georgetown, TX 78627	(512) 943-5198	janca@georgetownproject.com
Social Service Organizations, Housing for Special Needs Populations, etc. (questionnaires; one focus group)		Assistance League of Georgetown Area	President	PO Box 1178 Georgetown, TX 78627	512-864-2542	president@algeorgetownarea.org
	Donna Harrell	Director Veterans Services	Williamson County	3151 SE Inner Loop Georgetown TX 78626	512-238-2151	dharrell@wilco.org
	Matt Pehus	Housing Coordinator	Hope Alliance		512-255-1212 x 307	matt.pehus@hopealliancetxt.org
	Kraig Fiero	Homeless Coalition Liason	Texas Homeless Network	1715 Fortview Road Austin, TX 78704		
	LeAnn Powers	Chief Professional Officer	United Way of Williamson County	1111 North IH-35, Suite 220 Round Rock, Texas 78664	512-255-6799	leann@unitedway-wc.org
	Dr. Chip Riggins	Executive Director	Williamson County Cities and Health District	100 West 3rd Street Georgetown, Texas 78626	512-943-3600	criggins@wcchd.org
	Andrew Shell	Executive Director	Williamson Burnet County Opportunities	604 High Tech Drive Georgetown, TX 78626	512 763-1400	ashell@wbco.net
	Brenagh Tucker	Program Assistant	Williamson Burnet County Opportunities	604 High Tech Drive Georgetown, TX 78626	512 763-1400	btucker@wbco.net

Stakeholder Chart
 Consultation Process for the
 Williamson County, TX Analysis of Impediments to Fair Housing Choice

Type of Organization	Contact Name	Title	Name of Organization	Mailing Address	Telephone	Email Address
	Scott Ferguson	Director of Development	Williamson Burnet County Opportunities	604 High Tech Drive Georgetown, TX 78626	512 763-1400	sferguson@wbco.net
	Ken Martin	Executive Director	Texas Homeless Network		512.687.5101	ken@thn.org
	Eric Samuals	Balance of State Manager	Texas Homeless Network		512.687.5101	eric@thn.org
	Jo kathryn Quinn		Caritas of Austin	PO Box 1947 Austin, TX 78767	512.479.4610	jkquinn@caritasofaustin.org
	Christa Noland	Deputy Director	Green Doors	PO Box 685065 Austin, TX 78768	512.469.9130	cnoland@greendoors.org
	Cliff Chong	Housing Specialist	Green Doors	PO Box 685065 Austin, TX 78768	512.469.9130	cchong@greendoors.org
	Julia Spann	Executive Director	Safe Place	PO Box 19454 Austin, TX 78760	512.267.7233	Info@SafePlace.org
Local Landlords Association (interview)	Gilbert Alires		Realty Executives			gilbert@realtyexecutives.com