

**Analysis of Impediments to Fair Housing Choice  
2020 Update**

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

August 15, 2020



**City of Bryan  
Community Development Services Department  
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## Introduction

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

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

### Fair Housing Complaints:

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

[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/online-complaint](https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint)

Or, contact HUD:

#### SOUTHWEST OFFICE

Fair Housing Hub U.S. Dept. of Housing and Urban Development

801 North Cherry, 27th Floor Fort Worth, TX 76102

Telephone (817) 978-5900 or 1-888-560-8913 Fax (817) 978-5876 or 5851 • TTY (817) 978-5595

E-mail: [Complaints\\_office\\_06@hud.gov](mailto:Complaints_office_06@hud.gov)

Or, contact the Texas Workforce Commission Civil Rights Division:

Texas Workforce Commission

Civil Rights Division

1117 Trinity Street, Rm. 144-T

Austin, Texas 78701

888-452-4778

[http://www.twc.state.tx.us/crd/file\\_hsg.html](http://www.twc.state.tx.us/crd/file_hsg.html)

## Study Description

### The Analysis of Impediments to Fair Housing Choice Update

This Analysis updates that the original analysis to coincide with the City of Bryan's 2020-2024 Consolidated Plan. The study was performed in order to satisfy the requirements of 24 CFR 91.225(a) (1) titled "Certifications", which states:

*"Affirmatively furthering fair housing."* Each jurisdiction is required to submit a certification that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to

fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard." This update was performed to meet that requirement.

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

## Study Observations and Recommendations Summary

### Fair Housing Action Work Plan

This Fair Housing Work Plan provides a nexus between the City of Bryan Community Development Services Department (CDS) planned fair housing activities in the coming fiscal year (Program Year 2020), and the observations made in the City's 2020 Analysis of Impediments to Fair Housing Choice:

- **Observation 1:** There have been 15 discrimination complaints made during the 2015-2019 review period, all but one of which related to discrimination in rental. Of the 14 rental cases, 13 of these were related to discrimination based upon rental terms, conditions, acts, refusal, or facilities. The primary basis for discrimination complaints was race (35%), followed by disability (30%). There was one case regarding terms of sale, which alleged discrimination based upon national origin. All cases were found to be without cause, withdrawn, conciliated, or administratively closed. The number of discrimination complaints decreased from the 2005-2009 period, when there were 19 complaints in Bryan. The decrease represents a 21% decrease in discrimination complaints over the prior evaluation period.

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments.

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

- **Observation 2:** Most dilapidated housing is located in low to moderate income areas based upon housing condition data collected during development of the 2020-24 CP.

**Recommendation 1:** Continue rehabilitation and reconstruction programs and particularly

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative and project funds.

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative funds, and City of Bryan Public Communication General Funds.

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

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative funds.

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative funds.

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

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG –

Administrative funds.

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

**Recommendation 1:** Continue to monitor case law in relation to this zoning classification. Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative funds.

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative funds.

- **Observation 6:** While no local policies were identified as barriers to affordable housing, implementation of the Integrated Mortgage Disclosures under the Real Estate Settlement Procedures Act (Regulation X) and the Truth in Lending Act (Regulation Z) by the Consumer Financial Protection Bureau (CFPB) has the potential to negatively affect housing affordability and availability. Sections 1098 and 1100A of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) revised rules, which apply to most mortgage transactions. Real Estate industry professionals anticipate these requirements will significantly extend the time required to close for financed purchases, which will result in cash investor purchasers having an even greater advantage in the marketplace over financed homebuyers, especially in the lower-end housing price ranges. We are continuing to monitor and have anecdotally noted that, although closings are somewhat delayed, the lack of supply of affordable homes is of much greater impact to housing availability and affordability.

**Recommendation 1:** Continue to monitor past and recent implementations of the Integrated Mortgage Disclosures rules on affordable housing and loan availability for low-income homebuyers. Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments.  
Source of Funds: Community Development Budget CDBG – Administrative funds.

- **Observation 7:** According to HMDA data, Black applicants' incidence of conventional loan denial is higher than their percentage of their population as a whole and most often due to poor credit history ratings.

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments.  
Source of Funds: Community Development Budget CDBG – Administrative funds, and

HOME housing project funds (Down Payment Assistance).

**Recommendation 2:** Continue to promote Homebuyer Counseling Training to minority applicants Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments.

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

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative funds / General funds.

- **Observation 8:** Hispanics and Blacks have higher incidences of government insured loan denials due to excessive debt and inadequate collateral, respectively.

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative funds, and HOME housing project funds (Down Payment Assistance).

**Recommendation 2:** Continue to promote Homebuyer Counseling Training to minority applicants Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments.

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

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative funds / General funds.

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

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative funds, and HOME housing project funds (Down Payment Assistance).

**Recommendation 2:** Continue to promote Homebuyer Counseling Training to minority applicants Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly

assessments.

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

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

Completion Date: September 30, 2020 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative funds / General funds.

- **Observation 10:** Data indicates that both Black and Hispanic applicants for home improvement loans experience high denial rates due, primarily, to poor credit history ratings.

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative funds, and HOME housing project funds (Down Payment Assistance).

**Recommendation 2:** Continue to promote Homebuyer Counseling Training to minority applicants Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments.

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

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

Completion Date: September 30, 2021 (ongoing, thereafter), with quarterly assessments. Source of Funds: Community Development Budget CDBG – Administrative funds / General funds.

### **Nexus to Affirmatively Further Fair and Affordable Housing**

The City’s Community Development Services Department (CDS) tracks staff time spent on FHEO activities so that an equivalent administrative or program delivery costs attributed to FHEO efforts can be quantified. Similar calculations are made regarding local public service and housing agency staff costs on FHEO related activities. The following table lists outreach efforts where FHEO related information was made available during the most recent twelve months to affirmatively further fair and affordable housing and equal opportunity.

<b>DATE</b>	<b>OUTREACH EFFORT / EVENT</b>	<b>AVAILA BLE TO:</b>	<b>MEDIA or VENUE</b>
Available 24/7 online	Online FHEO information, local ordinance, and addresses, phone numbers, and email links to HUD and Texas Workforce complaint offices	Public	<a href="https://www.bryantx.gov/community-development/">https://www.bryantx.gov/community- development/</a>



1/15/2020	Local Pastors Meeting on 2020-24 Con Plan input and included FHEO information	Local Pastors	Bryan Community Development Office
1/21/2020	CDAC Public Meeting regarding 2020-24 Con Plan and included FHEO slides and information	Public	Bryan Municipal Building
2/13/2020	CDAC Public Meeting regarding 2020-24 Con Plan and included FHEO slides and information	Public	Bryan Municipal Building
2/15/2020	Carver Kemp Neighborhood Assoc. Meeting on input for 2020-24 Con Plan and included FHEO	Association Members	Hope Crossing Building
3/3/2020	Public Notice Legal Ad Referencing FHEO Info	Public	Bryan-College Station Eagle Newspaper
Mar. 2020	City Twitter media post on input opportunities for 2020-24 Con Plan and FHEO	Public	<a href="https://twitter.com/CityofBryan/status/1234870104577409024">https://twitter.com/CityofBryan/status/1234870104577409024</a>
Mar. 2020	City Facebook media post on input opportunities for 2020-24 Con Plan and FHEO	Public	<a href="https://www.facebook.com/events/198081271402973/">https://www.facebook.com/events/198081271402973/</a>
Feb. – Mar. 2020	Online Fair Housing Survey Providing Info and receiving input on Fair Housing	Public	<a href="https://www.surveymonkey.com/r/BryanFairHousing2020">https://www.surveymonkey.com/r/BryanFairHousing2020</a>
Feb. – Mar. 2020	Online Longform Questionnaire Providing Info and receiving input on Fair Housing	Public	<a href="https://www.surveymonkey.com/r/2020-24Questionnaire">https://www.surveymonkey.com/r/2020-24Questionnaire</a>
Feb. – Mar. 2020	Television and City Website Public Service Announcements – <b>English</b> Referencing FHEO Info	Public	<a href="https://www.bryantx.gov/channel16/">https://www.bryantx.gov/channel16/</a>
Feb. – Mar. 2020	Television and City Website Public Service Announcements – <b>Spanish</b> Referencing FHEO Info	Public	<a href="https://www.bryantx.gov/channel16/">https://www.bryantx.gov/channel16/</a>
Feb. – Mar. 2020	YouTube Public Service Announcement – <b>English</b> Referencing FHEO Info	Public	<a href="https://www.youtube.com/watch?v=UTgLVDzZ3yc&amp;t=0s">https://www.youtube.com/watch?v=UTgLVDzZ3yc&amp;t=0s</a>
Feb. – Mar. 2020	YouTube Public Service Announcement – <b>Spanish</b> Referencing FHEO Info	Public	<a href="https://www.youtube.com/watch?v=ho-h8JMICE0&amp;t=0s">https://www.youtube.com/watch?v=ho-h8JMICE0&amp;t=0s</a>
Feb. – Mar. 2020	Public Service Announcement through Texas- 211 Referencing FHEO Info	Texas-211 Subscribers	Texas-211 Network and email subscribers
Feb. – Mar. 2020	Public Service Announcement through Community Partnership Board (CPB) Referencing FHEO Info	CPB Agencies	CPB Network and email subscribers

4/16/2020	Virtual CDAC Public Hearing on 2020-24 Con Plan and 2020 Action Plan input and included FHEO information	Public	<a href="https://www.bryantx.gov/community-development/">https://www.bryantx.gov/community-development/</a>
May 2020	CD Week – Mailed info to Contractors on FHEO and sent Section 3 Packets	Developers and Contractors	Bryan Community Development Office
5/6/2020	Virtual CDAC Public Hearing on 2020-24 Con Plan and 2020 Action Plan input and included FHEO information	Public	<a href="https://www.bryantx.gov/community-development/">https://www.bryantx.gov/community-development/</a>
6/22/2020	Public Notice Legal Ad Referencing FHEO and Analysis of Impediments	Public	Bryan-College Station Eagle Newspaper and City Online portal
June 2020	PSA Notices to Texas-211 and Community Partnership Board for agency notification	Public	Texas-211 and Community Partnership Board
6/25/2020	CDAC Public Hearing on 2020-24 Con Plan and Fair Housing and Affirmative Marketing	Public	Virtual Public Hearing <a href="mailto:communitydevelopmentweb@bryantx.gov">communitydevelopmentweb@bryantx.gov</a>
7/14/2020	City Council Regular Meeting 2020-24 Con Plan and Analysis of Impediments	Public	Bryan Municipal Building

### **Actions to Affirmatively Further Fair Housing**

Local FHEO activities that the city's CDS Office anticipates pursuing in the upcoming program year (PY2020-21) include the following:

- Provide notices and market affordable housing programs, properties, and services in Spanish language newspapers, radio, social media and/or television.
- Make Fair Housing and Affirmative Marketing information available to the public by holding multiple public hearings at public meetings during the program year.
- Hold all public meetings in ADA accessible facilities and ensure that housing projects comply with FHEO and ADA accessibility requirements.
- Make housing program information available to the disabled and non-English speakers by utilizing ADA accessible facilities and making translation and sign language services available.
- Make information on housing programs available to local churches, churches and civic groups that serve lower income persons and/or protected classes.
- When necessary, provide virtual/online opportunities for citizens to view and participate in public hearings.
- Contact local mortgage lenders and making FHEO information available to them as they carry out CRA programs and activities.
- Market available affordable units to lower income persons and/or protected classes by providing information to local churches, civic groups and agencies that serve them.
- Host a Contractor's Breakfast promoting FHEO topics during the NCDA CDBG week.
- Distribute Fair Housing posters to partnering entities, such as: city funded Public Service Agencies; the Council of Governments, etc.
- Provide FHEO information and/or materials to local neighborhood associations.
- Partner with Texas A&M's Center on Disability and Development, Brazos Valley Council of Governments, City of College Station, Brazos Valley Affordable Housing Corporation, and

others, in the promotion of Fair Housing.

- The City will disseminate Fair Housing Brochures and/or literature to local Realtors through the local Realtors Association.
- Prepare and provide Fair Housing Information and materials to be made available at various events and locations.
- Hold presentations with public and private employers, in conjunction with HR orientations.
- Host Fair Housing events with other local public and/or private organizations.
- Development standards will be as accommodating as possible to facilitate development of both market and affordable residential units.
- The City will avoid duplication between local jurisdictions regarding development-related processes and procedures.
- The City's building fees will be kept as reasonable as possible to ensure that affordable housing is not hindered.
- The City will apply flexibility in zoning and building requirements when appropriate to promote fair and affordable housing.
- Permit fees for City-sponsored affordable housing development are waived for participating non-profit developers, as well as outstanding city liens.
- Local development expenses are kept to a minimum in terms of housing construction and renovation costs.
- Technical assistance and homebuyer counseling is being provided by the city and local agencies to promote programs assisting lower income homebuyers.
- When appropriate, support affordable rental units, to include HTC (Housing Tax Credit) projects and privately owned properties to promote the development of affordable rental units.
- Continue partnerships with other inter-local agencies and interested citizens to encourage the development of accessible, special-needs housing, and provides funding and technical assistance to its CHDO's for development of affordable housing.
- Staff will continue to track time spent on FHEO activities to quantify time and funds expended.

#### **Previous and Ongoing Actions to Affirmatively Further Fair Housing:**

- City adopted a Fair Housing ordinance, CHAPTER 58, ARTICLE II. DISCRIMINATION: FAIR HOUSING, Sec. 58-40, to ensure fair housing options are available to its citizens.
- Outreach activities and public service announcements to improve public Fair Housing awareness to City boards, such as the City's Community Development Advisory Committee, Community Partnership board meetings (whose 80 nonprofit members serve primarily low/moderate income clients), and neighborhood associations.
- Annual Public Hearings and Public Meetings were held providing information and requesting public comment on fair housing or related issues during the 2015-2019 fiscal years. The efforts are held in ADA accessible facilities in a variety of locations to ensure the maximum feasible accessibility to the public.
- Down payment and closing cost program assistance made available citywide to eligible homebuyers by the Community Development Services Department and other local housing services providers.
- Homebuyer and homeowner education including fair housing information is provided by the city and other local housing services providers.
- City sponsored acquisition and new construction program efforts underway to increase affordable housing opportunities locally.
- The Community Development Services Department has made outreach efforts to for-profit and non-profit builders and developers through funding and technical assistance to increase the supply of decent, affordable housing within low to moderate-income neighborhoods as well as creation of affordable housing on a citywide basis.

- The City maintains an Affirmative Marketing Plan to directly market newly developed City-assisted housing units to minority groups least likely to apply.
- Community Development Services staff have met with local lenders through the Bank On Brazos Valley Program to encourage the use of non-traditional client loan qualifying and loan products to better serve the needs of homebuyer households with challenges that preclude conventional qualification.
- Annual Fair Housing outreach is conducted to participating contractors at breakfast meetings promoting FHEO topics during the NCDA CDBG week.
- Fair Housing materials and presentation is provided to new Section 8 rental landlords during orientation jointly with the City of College Station and Council of Governments.
- Fair Housing materials and presentation is provided periodically to homeless shelter caseworkers jointly with the City of College Station.
- Community Development Services staff have conducted public outreach regarding availability of housing and housing assistance, including Spanish-language radio broadcasts, translation of housing application materials into Spanish, and maintains bi-lingual staff in order to assist applicants and clients with Limited English Proficiency (LEP).

## **Results**

All City of Bryan-assisted developments are currently in compliance based upon Community Development Services Department monitoring review records. The supply of affordable housing available in low to moderate income areas and citywide has been increased through the activities of the department. The Building Inspections Division has used the Fair Housing Act of 1968 and the 1994 Americans with Disabilities Act as a standard of compliance for building plans review and code compliance. No complaints have been filed with the City Attorney's office under the City of Bryan Fair Housing Ordinance as of June 24, 2020. While information regarding discrimination cases has been requested from HUD FHO and TWC Civil Rights Division, none has yet been received to date for the 2015-19 period, and no Fair Housing Needs Survey respondents expressed a problem with discrimination in Bryan. This is a significant reduction from the prior reporting period. For the previous 2010-2014 period, there were 15 complaints made to HUD and/or the State of Texas Workforce Civil Rights Commission regarding discrimination in the City of Bryan. From the 2010-2014 Consolidated Plan Community Needs Assessment, 7% of surveyed respondents expressed a problem with discrimination.

## **Research Objectives**

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

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

## **Sources and Methods**

This study utilized data from a variety of sources, to include but not limited to: the U.S. Census Bureau, the Real Estate Center at Texas A&M University, the Bryan/College Station Association of Realtors Multiple Listing Service, the City of Bryan Community Development, Geographic Information Systems,

and Planning and Development Services Departments, the Brazos County Appraisal District, FFIEC, the Bryan Economic Development Corporation, and the 2015 Community Needs Assessment Survey.

## **National, State and Local Fair Housing Laws Summary**

### **National Fair Housing Laws**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**HUD Final Rule (Pending) Implementing the Fair housing Act's Disparate Impact Standard.** The Act creates liability for practices with an unjustified discriminatory effect, even if those practices were not motivated by discriminatory intent. This rule will amend HUD's interpretation of the Fair Housing Act's disparate impact standard to better reflect the Supreme Court's 2015 ruling in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*

### **State of Texas Fair Housing Laws**

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

### **Local Fair Housing Laws**

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

### **Activities Utilizing CDBG Funding to Affirmatively Further Fair Housing**

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

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

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

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

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

**Evaluation of activities utilizing CDBG funding.** Analysis of public hearing comments and survey data regarding fair housing activities finds continued emphasis on continuing fair housing presentations to the public and building public awareness of fair housing continues to be effective in increasing awareness. For the 2015-2019 reporting period to date, no data regarding discrimination cases was provided to the City by HUD FHEO or the Texas Workforce Commission Civil Rights Division. Two requests were made of each agency, the first on January 7, 2020, and second on June 4, 2020. This analysis will be updated if and when responses to these requests are received.

For the previous 2010-2014 period, there were 15 complaints made to HUD, and no complaints made to the State of Texas regarding discrimination in the City of Bryan. From the 2020 Consolidated Plan Community Needs Assessment survey, zero (0%) of surveyed respondents expressed a problem with discrimination. No applications for non-profit Public Service Agency CDBG funding were received by organizations working to further fair housing in the previous plan period. Local for-profit and non-profit homebuilders have successfully increased the supply of decent, affordable housing available in both low to moderate-income neighborhoods and citywide because of the City's outreach and technical assistance.

## **Affirmative Marketing Policy and Procedures (See Appendix-F)**

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

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

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

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

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

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

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

- Corresponding with various community organizations, employment agencies, churches, etc. in order to accomplish special outreach to those not likely to apply for housing in the available properties.



- Utilizing the fair housing logo on all printed advertisements and prominently in the business office.
- Providing fair housing brochures to prospective tenants informing them of fair housing laws and the City's Affirmative Marketing Policy.

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

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

## **Analysis of Local Housing Market and Business Practices**

### **Community Needs Assessment Survey Summary**

In February and March 2020, the City solicited input from citizens, agencies and public offices. The 15-page survey asked questions regarding housing needs, health and human services, fair housing and discrimination issues, special needs, infrastructure and public facility needs, and economic development needs. Online surveys and mailings were used, as well as newspaper notices, workshops, public hearings, TV/radio, website and YouTube postings. English and Spanish were used in outreach. Groups include: local/regional agencies, elected officials, city offices, neighborhood associations, state agencies, churches, schools and civic groups.

The survey received approximately 123 responses for 22 different options in five broad categories of: housing, public facilities, public services, code enforcement, and economic development. The surveys, available online, solicited input on current eligible activities, to include housing and non-housing subjects. Housing questions involved: supply, energy efficiency, discrimination, repair, and buying/renting. Non-housing questions covered: public facilities; public services; and economic development. Current programs include: housing rehabilitation, reconstruction and minor repair; homebuyer assistance; clearance/demolition; public facilities/infrastructure improvements; broadband access, and public service agency programs.

All currently administered activities were rated as important or very important by a majority of respondents. Regarding housing discrimination, all respondents reported that local housing was available, regardless of race, color, gender, national origin, religion, marital status, family size and age. No survey participants reported experiencing discrimination.

One comment was received in the Fair Housing Needs Survey:

One commenter suggested the City had discriminated against lower-income households with newer planning ordinance precluding manufactured homes (more affordable than site-built) outside designated zoning districts.

Additionally, a COVID-19 Impact Survey was made available online and 60 citizens responded to the City of Bryan COVID-19 Impact Survey. Of the ten need options listed, those ranked as “important” or “most important” by at least 70% of the respondents were, in order: food distribution, food delivery, testing and diagnosis, increased health services, economic assistance for businesses and employees, and rental assistance.

### **Advertising policies and practices:**

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

- The City of Bryan Community Development Staff reviewed six months of real estate sale and rental advertisements published in the local newspaper of record, The Bryan/College Station *Eagle* from January through June, 2020 to ascertain that prohibited terminology was not used, that no preferences concerning protected classes were evident, and that models were of diverse groups.
- The real estate classified section properly contains an equal housing opportunity notice, and no overtly discriminatory advertisements or use of prohibited terms was found.
- Based on this review, there is judged to be no impediments to fair housing with regard to newspaper advertising in Bryan.
- Radio and television advertising were also monitored during this period. Cox Cable channel 11 is exclusively devoted to ads for home sales. These were reviewed, and the narratives and photos were found to be non-discriminatory.
- Since 2015, no complaints have been made regarding discriminatory advertising.

**Homeowners Insurance:** No studies have indicated impediments to fair housing existing in the Bryan homeowner’s insurance market.

- Advertising: A review of the homeowner’s insurers advertising in the Verizon yellow pages indicates no discriminatory practices. The yellow pages are the predominant advertising medium for insurance companies in the area.
- Affirmative marketing: Ads generally have no pictures, other than some with agents' photos, and some have equal housing opportunity logos and advertise services in Spanish. It is noted that no minorities appear in the advertisements, and it is recommended that ads using pictures include minority models.
- Location of Agents/Offices: Review of the insurance business locations show that they are distributed primarily along major thoroughfares, without regard to racial concentrations. Several offices are located nearby neighborhoods of racial concentration.

- **Policies:** No studies indicate discrimination on the basis of (I) age, (ii) geographic marketing, or (iii) value/replacement cost to values by insurers in Bryan.

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

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

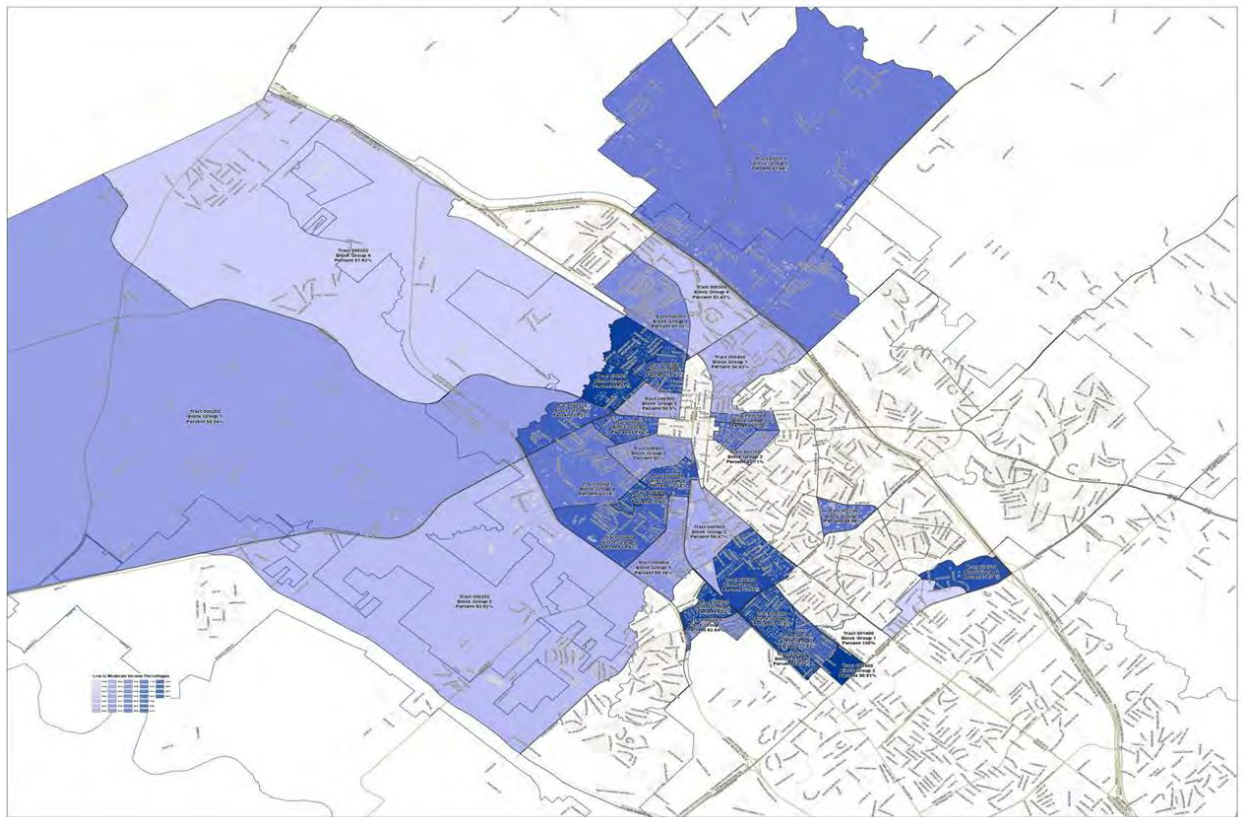
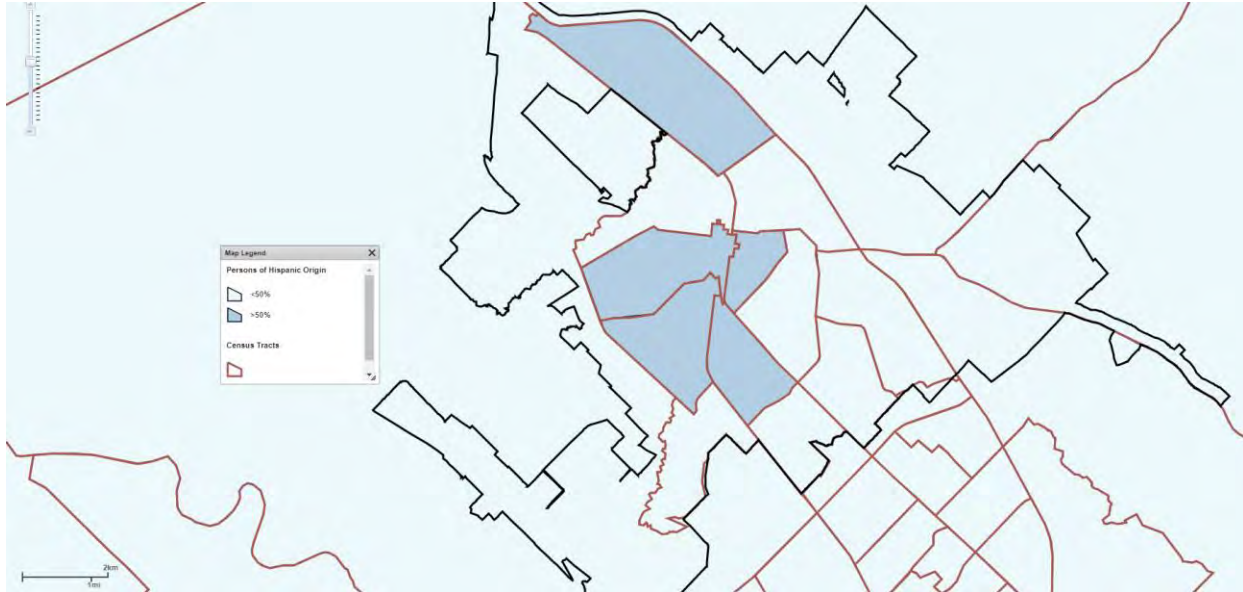
**2016 FFIEC HMDA Data Tables (SEE APPENDIX C)  
for**

**Disposition of Applications for Conventional, Government Insured, Refinance and Home Improvement Loans**

**Observation:** HMDA data indicates that both Black and Hispanic applicants generally experience high denial rates as demonstrated in the appendix tables. Denials are primarily attributable to poor credit history ratings. Loan denial percentages, as compared to respective percentages of the population as a whole, are higher for Blacks and Hispanics, respectively. This data suggests that consumer credit counseling and homeowner education should continue to be a priority in the assistance provided by the city and other local housing assistance providers, and should be affirmatively marketed to minority populations.

# Areas of Minority Concentration

## Census Tracts Where Hispanics Comprise over 50% of Population



0 0.5 1 Miles

Low to Moderate Income Areas



In Bryan, concentrations of minority citizens are predominately located in the older central and northern neighborhoods. The census tracts containing 50 percent or more, racial and/or ethnic minority concentrations are census tracts 5.00, 6.03, 6.04, and 9.00. A census tract with a minority concentration of more than 50 percent of any racial or ethnic group is define as having a racial/ethnic concentration. The following CPD Maps contains information based on ACS data and indicates census tracts with more than 50 percent of any one race or ethnic minority group. There are no concentrations of minority racial groups, but there are four census tracts where ethnic minorities (Hispanics) total in excess of 50 percent of the total population.

Many of the dwelling units in these neighborhoods were built before 1950, and a substantial percentage of them are in poor condition. During the last ten years, a very high percentage of the rehabilitation projects sponsored by the City of Bryan Community Development and HUD have been located in these neighborhoods. Additionally, analysis is provided in the following CPD maps showing census tracts in Bryan where more than 50 percent of households have incomes at, or less than, 80, 50 and 30 percent of the area median income or less.

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

- Advertising: A review of advertising by rental housing providers indicates no overtly discriminatory practices, however, it should be noted that only a small minority of providers utilize the equal housing opportunity logo in their advertising, although most websites do contain the EHO logo. A diversity of human models is now noted, a practice which has evolved from previous evaluation periods which noted primarily non-minority human models. However, usually omitted from advertising and websites are any references to units available for disabled residents, and limited Spanish language advertisements.
- Steering based on protected class status: There is no indication of steering based upon protected class status in the rental housing market in Bryan.
- Affirmative Marketing Programs: The City of Bryan has not participated in a rental development of five or more units, and has not received documentation of any affirmative marketing programs. However, in the future, if the city participates in a development of five or more units, an affirmative marketing plan will be required.

### **Sale of Existing Housing**

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

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

protected class. One recent, major change to the zoning ordinance was the elimination of the Mixed Use-1 (MU-1 Residential) zoning district. The MU-1 zoning district allowed manufactured homes by right. This district has now been combined into the existing Residential District 5000 (Single Family RD-5000) district, which does not allow manufactured homes, except to the extent allowed under Texas state law for one-time replacement of existing manufactured homes. See the following table of zoning classifications:

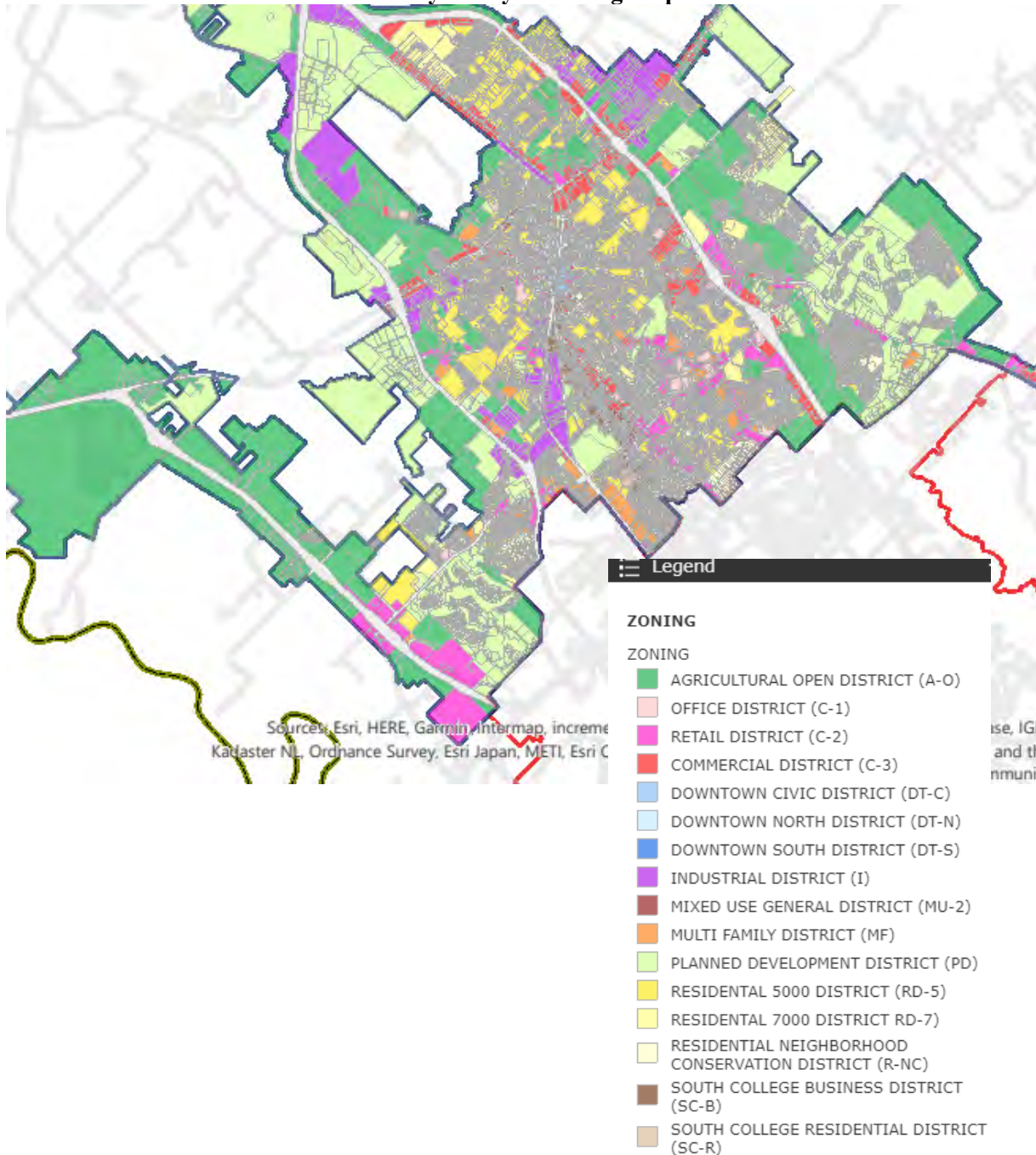
The following zoning districts have been established in the City of Bryan:

<b>Abbreviated Designation</b>	<b>Zoning District Name</b>
A-O	Agricultural-Open District
RD-7	Residential District - 7
RD-5	Residential District - 5
MF	Multiple-Family District
DT-N	Downtown - North District
DT-S	Downtown - South District
DT-C	Downtown - Civic District
SC-B	South College - Business District
SC-R	South College - Residential District
C-1	Office District
C-2	Retail District
C-3	Commercial District
I	Industrial District

<b>Abbreviated Designation</b>	<b>Special Purpose District Name</b>
HP	Historic Preservation Overlay District
PD	Planned Development District

Abbreviated Designation	Special Purpose District Name
CO	Corridor Overlay District
MU-2	Mixed Use District
R-NC	Residential - Neighborhood Conservation District

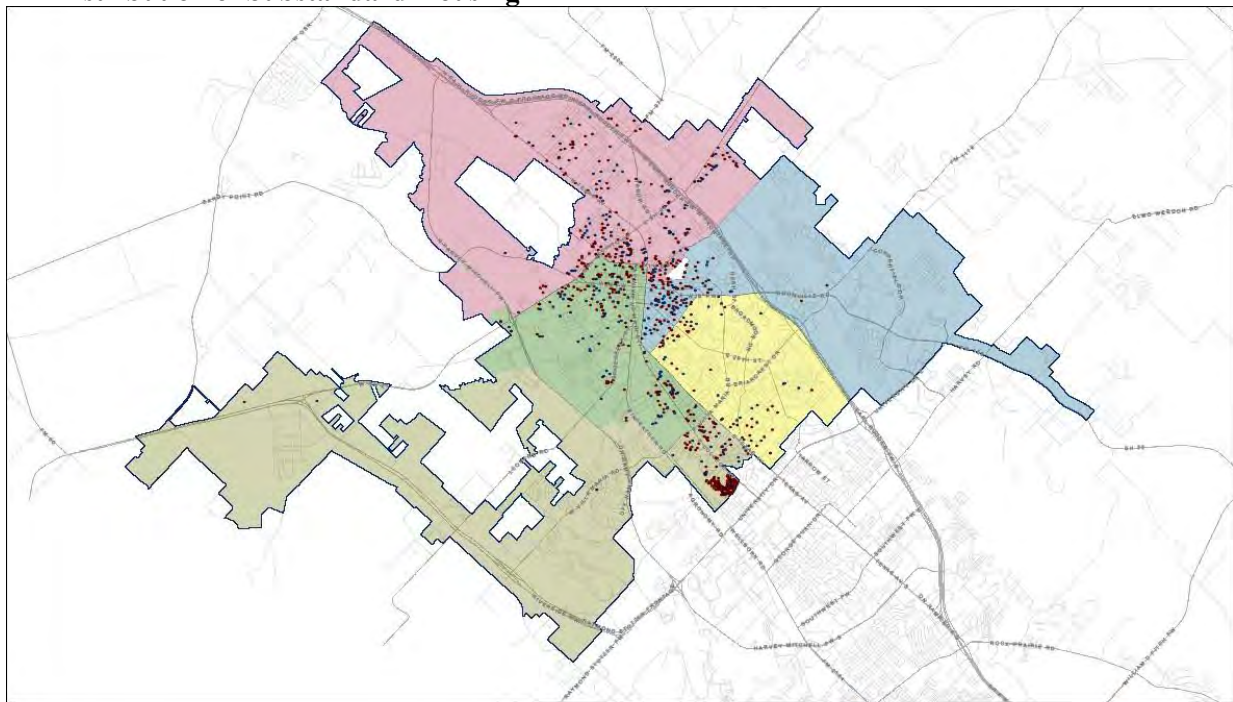
**City of Bryan Zoning Map**



There exists a variety of zoning classifications and designations suitable for housing, with sufficient amounts of suitably zoned property to accommodate various housing developments, from single family, duplex, multifamily, mixed use, and planned developments. There is also a significant area of undesignated (Agricultural-Open), which could be rezoned to residential development. There have been several successful Low Income Housing Tax Credit Developments in the City of Bryan, and many proposals for these developments, indicating that there is a sufficient supply of properties suitable for multifamily development.

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

- **Distribution of Substandard Housing**



### Definitions

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

For the City’s CDBG/HOME grant funded programs, housing units defined as *Substandard - Suitable for Rehabilitation* are those requiring significant repair. These units are, with minimal renovation, structurally sound, but due to lack of maintenance and repair, are in jeopardy of falling into a dilapidated



state if needed renovations are delayed or ignored. To be considered for rehabilitation assistance, the estimated after-rehab appraisal of the unit must be equal to or greater than 50% of the pre-rehab appraisal added to the rehabilitation costs.

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

## **Housing Conditions Definitions**

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

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

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

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

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

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

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

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

## **Conclusions**

In late summer and early fall of 2019, the City's Community Development Services Department received, sorted, and analyzed over 31,400 residential properties to assess the overall property conditions and identify needed programmatic remedies. Given the demands, and limitation, on local and federal funding it appears program and incentive efforts should be directed at conditions that erode neighborhood safety and integrity – specifically substandard and dilapidated housing units.

Efforts should include housing repair, rehabilitation, and replacement as well as demolition assistance

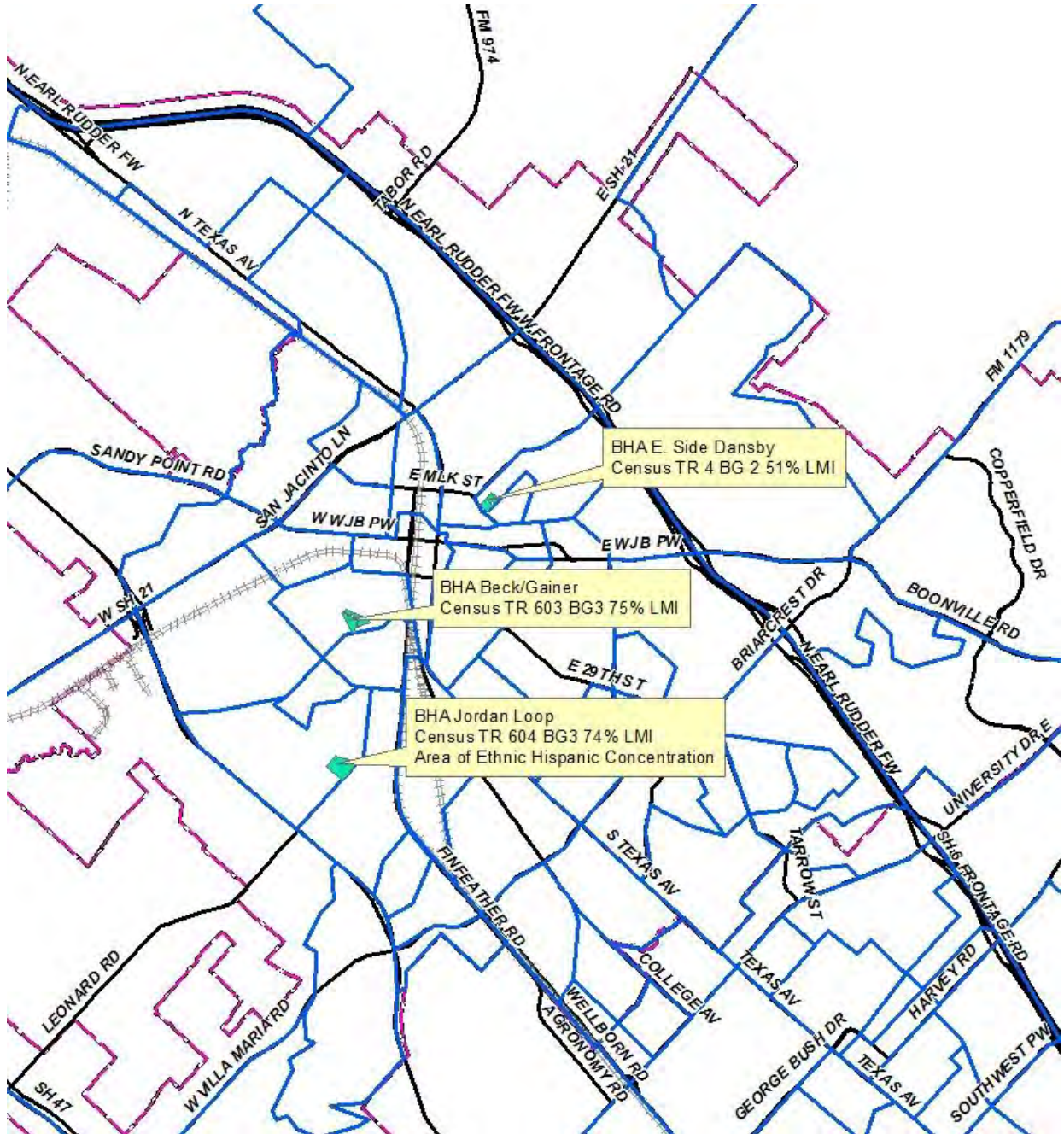
and development of new affordable housing. When possible, program assistance should also promote the continued maintenance of housing units currently determined to be rated conservable, so as to preclude them from falling into a substandard condition.

The entire community benefits when residents have access to decent and affordable housing and when dilapidated structures – particularly vacant ones – are removed and replaced with new, efficient, and affordable dwellings. Given the numbers of potentially substandard and dilapidated units identified, and the limited resources available to address these units, program efforts should focus on these properties.

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

- The intent of the voucher choice program (Section 8) is to provide housing choice to renters to obtain housing throughout the market area, not just in concentrated subsidized housing. Households utilizing vouchers pay 30 percent of income for rent and utilities. The difference between this amount and the HUD Fair Market Rent (FMR) is the tenant’s subsidy, provided through locally through the Brazos Valley Council of Governments. These 1,902 local vouchers allow greater dispersion of low income households, allowing them to obtain rental housing anywhere the rent is below the FMR. FMRs in Bryan are generally high enough so that voucher holders have housing choices across a broad geographic area. The above map indicates the success of this strategy, as voucher holders are well dispersed throughout the community. There is currently a significant waiting list for housing vouchers, as approximately 1,600 applicants remain unserved.
- Public housing: There are 300 multi-site public housing units in the City of Bryan operated by the Public Housing Authority of the City of Bryan, which are located in primarily low to moderate income areas, and one area of minority ethnic (Hispanic) concentration. See below map:

## Distribution of Public Housing

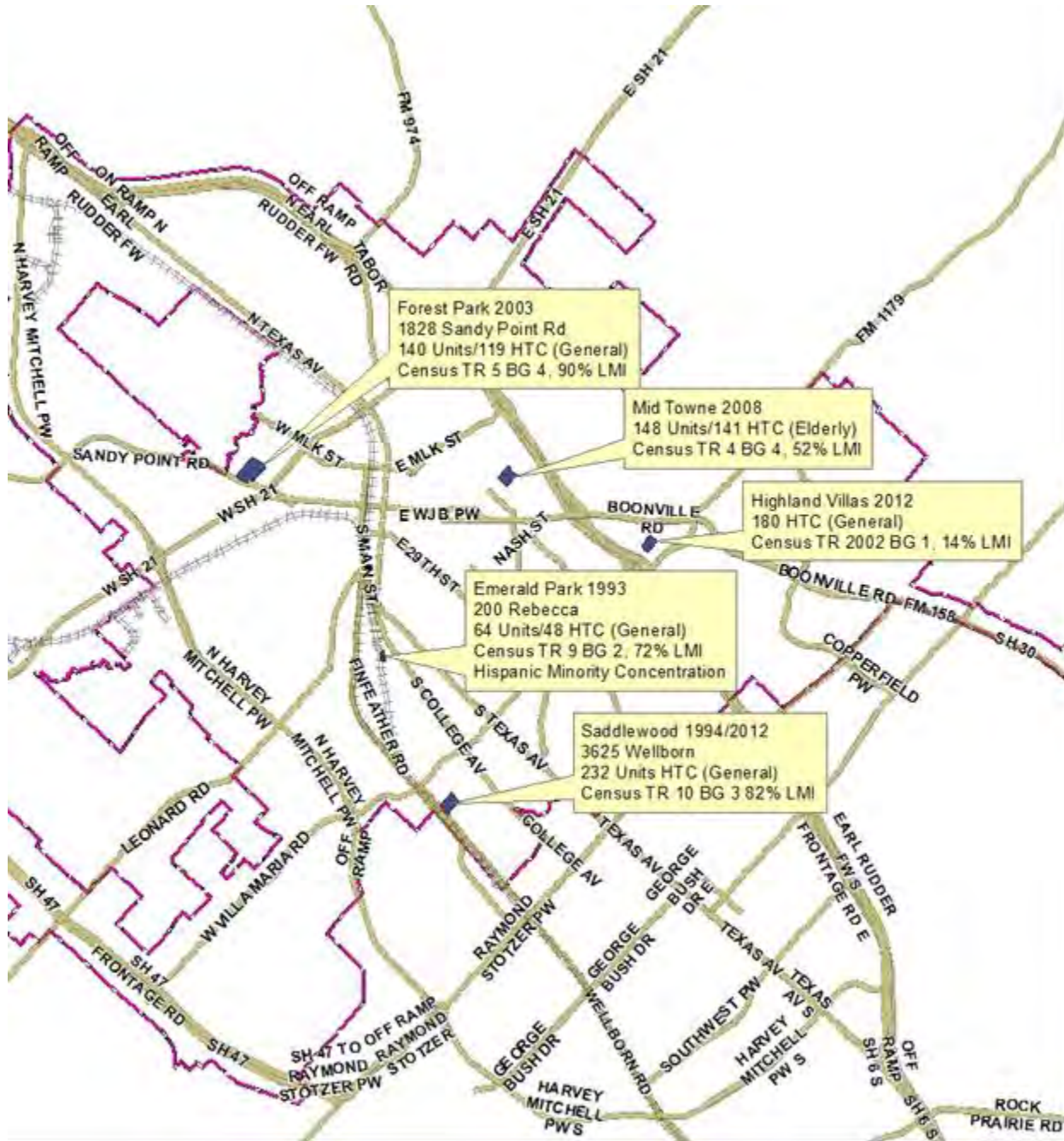


In light of the U.S. Supreme Court's Disparate Impact ruling, any future expansion or development at these sites must be further evaluated to determine the extent to which the development may disparately impact protected classes. New public housing may be required to be located in more affluent areas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

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

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

### Distribution of LIHTC's



## Potential Areas of Discriminatory Business Practices and Identification of Impediments:

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

§ 92.010 OCCUPANCY LIMITS. (a) Except as provided by Subsection (b), the maximum number of adults that a landlord may allow to occupy a dwelling is three times the number of bedrooms in the dwelling. (b) A landlord may allow an occupancy rate of more than three adult tenants per bedroom: (1) to the extent that the landlord is required by a state or federal fair housing law to allow a higher occupancy rate; or (2) if an adult whose occupancy causes a violation of Subsection (a) is seeking temporary sanctuary from family violence, as defined by Section 71. 004, Family Code, for a period that does not exceed one month. (c) An individual who owns or leases a dwelling within 3,000 feet of a dwelling as to which a landlord has violated this section, or a governmental entity or civic association acting on behalf of the individual, may file suit against a landlord to enjoin the violation. A party who prevails in a suit under this subsection may recover court costs and reasonable attorney's fees from the other party. In addition to court costs and reasonable attorney's fees, a plaintiff who prevails under this subsection may recover from the landlord \$500 for each violation of this section. (d) In this section: (1) "Adult" means an individual 18 years of age or older. (2) "Bedroom" means an area of a dwelling intended as sleeping quarters. The term does not include a kitchen, dining room, bathroom, living room, utility room, or closet or storage area of a dwelling. Added by Acts 1993, 73rd Leg., ch. 937, § 1, eff. Sept. 1, 1993. Amended by Acts 2003, 78th Leg., ch. 1276, § 7.002(o), eff. Sept. 1, 2003.

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

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

These provisions are not intended to limit the applicability of any *reasonable* local, State, or Federal restrictions on the maximum number of occupants permitted to occupy a dwelling unit. A number of jurisdictions limit the number of occupants per unit based on a minimum number of square feet in the unit or the sleeping areas of the unit. *Reasonable* limitations by governments would be allowed to continue, as long as they were applied to all occupants, and did not operate to

discriminate on the basis of race, color, religion, sex, national origin, handicap or familial status. *Id.* at 31; *see also Edmonds*, 514 U.S. at 735 n.8 (quoting legislative history). (Emphasis added)

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

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

**Zoning Reclassification MU-1 to RD-5000:** One recent, major change to the zoning ordinance was the elimination of the Mixed Use-1 (MU-1 Residential) zoning district. The MU-1 zoning district allowed manufactured homes by right. The City's Planning and Zoning Commission (P&Z) voted unanimously on March 28, 2019, and the City Council voted 5-2 on April 9, 2019 to convert all of the existing MU-1 zoning district (2,606 properties) into the existing Residential District 5000 (Single Family RD-5) district, which does not allow manufactured homes, except to the extent allowed under Texas state law for one-time replacement (unless destroyed by disaster, in which case a manufactured housing unit may be replaced, regardless of the one-time replacement rule). This action was taken for the following stated reasons by P&Z and the City Council:

- The MU-1 zoning district was implemented as a transitional zoning type and was intended to be reevaluated;
- Manufactured homes depreciate in value and typically have higher interest rates for financing, even though initial purchasing costs are lower;
- Manufactured homes have the same utility demands as stick-built homes, but do not produce the same property taxes;
- The intention of this amendment is to begin to build neighborhoods that citizens deserve and allow residents to protect their assets;
- Concerns about the quality, appearance, durability, lack of price appreciation of manufactured housing, and the perceived negative impact these factors have on neighboring property values;
- Existing dilapidated manufactured housing units have, through normal wear and tear or lack of proper maintenance, passed the end of their service life but are still in use as dwellings;
- Continuing to allow the installation of manufactured homes on individual lots will create conditions having a long-term negative effect on the welfare of the public

At the P&Z meeting, 27 citizens spoke against the proposal, with one in favor. At the City Council meeting, 24 citizens spoke against the proposal, with 4 in favor. Those against were primarily concerned about the lack of affordable housing in Bryan, and that removing manufactured housing as an option would further limit affordable housing development. This conversion rendered approximately 750 existing manufactured homes a legal, grandfathered, non-conforming use. Existing manufactured homes in this district may be replaced once, and as those homes then reach the end of

their useful life, will be required to be replaced with site-built homes. On properties formerly zoned MU-1 which do not have an existing manufactured home, this action had the immediate effect of removing manufactured housing as one affordable housing option, and rendered properties with fractured title which could have been developed with manufactured housing undevelopable. No formal survey or study of MU-1 property ownership or manufactured housing occupancy in this district was conducted prior to this conversion. It is important to consider in light of the June 25, 2015 U.S. Supreme Court *Texas Department of Housing & Community Affairs v. The Inclusive Communities Project, Inc.* disparate impact ruling, and HUD's proposed Disparate Impact Final Rule, that to the extent that a majority of manufactured homeowners or occupants in the former MU-1 district may be protected classes, a court could possibly consider this zoning conversion to have had an unintentional but disparate adverse discriminatory impact upon these owners and occupants, if the court were to determine that the stated reasons for the conversion were not sound business considerations.

To further encourage the redevelopment of manufactured homes with site-built housing, the City Council subsequently adopted the Bryan Home Foundation Initiative (BHFI) program on July 9, 2019, which provides a \$10,000 incentive from the City's general fund to eligible manufactured homeowners in the former MU-1 zoning district who redevelop their properties with site-built homes. This program was initially funded with \$130,000, with the intent of providing assistance to 10 manufactured homeowners. After significant public outreach, to date, two applicants have been approved for assistance. One project is in the design stage, and one homeowner withdrew from consideration.

## **Housing Availability and Affordability Profiles**

### **Housing Market Analysis**

#### **MA-05 Overview**

#### **Housing Market Analysis Overview:**

The April 2020 Real Estate Center at Texas A&M University indicated that single-family sales volume decreased year-over-year by 5.1%, and the average sales price declined 0.61%. The median price also declined by 0.63% while months of inventory rose. Several factors should be considered in these changes, but the COVID-19 pandemic clearly impacts real estate activity and likely contributes to the reductions in sales and prices. The 2011 – 2015 ACS 5-year estimates indicated that the combined renter and owner households have 19% of occupants that are housing cost burdened. Renters are much more likely to be cost burdened, with 28% of renters being cost burdened compared to only 9% of owners. CHAS data used in this plan show occupied units in Bryan (46% owner-occupied and 54% renter occupied). The median housing value is \$119,500 and the median rent is \$632. It appears sufficient affordable housing units exist, 24,127 units affordable for households with income limits up to 100% AMI. However, there are 7,285 renter households and 2,989 owner households that have monthly costs between 31% and 50% of the household's monthly income. Of more concern, there are 4,285 renter occupied units and 1,224 owner households with monthly costs greater than 50% of the household's monthly income suggesting that additional affordable rental and owner occupied units are needed. It's estimated that approximately 24% of residential units are in excellent condition, 28% in good condition, 39% in conservable condition, and almost 6% in substandard condition. Dilapidated properties are deemed not suitable for rehabilitation because the costs to bring the property to code standards exceed 50% of the after-rehabilitation appraisal. These properties are generally vacant, have structural failure, lack safe plumbing and electrical systems and pose health and safety threats. It's estimated that approximately 3% (946 of all type units) in Bryan are dilapidated, including



approximately: 160 traditional single-family units, 7 duplex, triplex, or similar, and 779 individual apartment units).

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

### Introduction

According to the 2011-2015 ACS 5-year estimates, there were 28,925 occupied housing units within the City of Bryan. Of these, 46% owner-occupied and 54% renter occupied, with an estimated vacancy 11%. The median housing value is \$119,500 and the median rent is \$632. It appears sufficient affordable housing units exist, 24,127 units affordable for households with income limits up to 100% AMI. However, there are 7,285 renter households and 2,989 owner households that have monthly costs between 31% and 50% of the household's monthly income. Of more concern, there are 4,285 renter occupied units and 1,224 owner households with monthly costs greater than 50% of the household's monthly income. Based on reviewed data, there were 16,900 households below 100% AMI, and 12,025 above 100% AMI. 2011-15 ACS data shows 13,410 owner-occupied homes, a slight increase of 118 units (.9%) since the 2007-11 ACS data.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	16,710	52%
1-unit, attached structure	1,020	3%
2-4 units	5,245	16%
5-19 units	3,810	12%
20 or more units	2,695	8%
Mobile Home, boat, RV, van, etc.	2,665	8%
<b>Total</b>	<b>32,145</b>	<b>100%</b>

**Table 1 – Residential Properties by Unit Number**

**Data** 2011-2015 ACS

**Source:**

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	70	1%	595	4%
1 bedroom	110	1%	3,320	21%
2 bedrooms	2,020	15%	7,065	46%
3 or more bedrooms	11,210	84%	4,545	29%

	Owners		Renters	
	Number	%	Number	%
<b>Total</b>	<b>13,410</b>	<b>101%</b>	<b>15,525</b>	<b>100%</b>

**Table 2 – Unit Size by Tenure**

**Data** 2011-2015 ACS

**Source:**

**Displaying data for Bryan city, Texas  
Year Selected: 2011-2015 ACS**

Housing Cost Burden Overview <sup>3</sup>	Owner	Renter	Total
Cost Burden <=30%	10,180	7,840	18,020
Cost Burden >30% to <=50%	1,765	3,000	4,765
Cost Burden >50%	1,224	4,285	5,509
Cost Burden not available	240	390	630
Total	13,405	15,520	28,925

**Owner and Renter Costs Table**

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

According to the Department of Housing and Urban Development, the purpose of the Section 202 Housing Program is to "provide direct Federal loans...to assist private, nonprofit corporations and consumer cooperatives in the development of new or substantially rehabilitated housing and related facilities to serve the elderly, physically handicapped, developmentally disabled or chronically mentally ill adults."

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

The LIHTC program is a federally funded manner of stimulating construction and rehabilitation of affordable housing by reducing federal income tax liability. The Texas Department of Housing and Community Affairs (TDHCA) is responsible for awarding tax credits to qualifying residential developments. According to the TDHCA, in order to qualify for tax credits, proposed residential developments must involve new construction or undergo substantial rehabilitation of residential units.

The Bryan Housing Authority also manages 300 affordable duplex and townhome style rental units for individuals and families. BHA provides a Services Coordinator and computer lab, and also partners with the school district and other agencies to ensure residents have access to education, recreational and health and human services.

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

According to the Department of Housing and Urban Development, the purpose of the Section 202 Housing Program is to "provide direct Federal loans to assist private, nonprofit corporations and consumer cooperatives in the development of new or substantially rehabilitated housing and related facilities to serve the elderly, physically handicapped, developmentally disabled or chronically mentally ill adults." In Bryan, there are three 202 properties and five Low Income Housing Tax Credit (LIHTC) properties that, likewise, were developed and/or redeveloped using LIHTC funds which require multiple years of affordable rent for lower-income tenants. The Bryan Housing Authority also manages subsidized units.

Of the nine different subsidized (202 and LIHTC) multi-family rental properties in Bryan (Emerald Park, Saddlewood Club, Forest Park, Mid Towne, Highland Villas, Crestview Terrace, Crestview Place, Crestview Unity, and Bryan Housing Authority), none have units with 202 or LIHTC affordability obligations ending during the 2015-19 Consolidated Plan period. Likewise, the Bryan Housing Authority does not anticipate losing any of its 300 affordable rental units during the next five years.

The LIHTC program is a federally funded manner of stimulating construction and rehabilitation of affordable housing by reducing federal income tax liability. The Texas Department of Housing and Community Affairs (TDHCA) is responsible for awarding tax credits to qualifying residential developments. According to the TDHCA, in order to qualify for tax credits, proposed residential developments must "involve new construction or undergo substantial rehabilitation of residential units.

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

In the last 3 years, Bryan's population and housing units have grown at approximately the same rate. Estimated vacancy rate is approximately 11%, which may indicate adequate housing. Other data in this plan show, however, that cost burden is problem for the lower-income residents, which indicates that there still may be need for additional affordable owner and renter units.

**Describe the need for specific types of housing:**

Input from local agencies and government offices, and citizen input indicate needs for special needs and elderly units (particularly rental), new home developments affordable to homebuyers in the 50-80% AMI range, and additional rental units to accommodate large families (5 or more household members).

**Discussion**

The number of available units for purchase and rent - to include accessible, subsidized, and otherwise targeted for lower-income tenants and buyers - coupled with other influences (current interest rates and underwriting policies, age and condition of units, available financing and favorable rates, and local economic trends) will all determine needs and will define affordable housing strategies going forward.

Staff will continue to assess needs and barriers to affordable, accessible and safe housing in Bryan. Partnerships with non-profit developers, as well as for-profit developers, mortgage institutions, and other housing entities is key to the City's successful housing programs.

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

**Introduction**

Housing affordability impacts not only decisions related to housing choice, but, if the household spends between 30% and 50% of its income on housing costs, the household may be at increased risk of becoming homeless, or not being able to afford other basic necessities. Cost burdened households have less financial resources to meet other basic needs (food, clothing, transportation, medical, etc.) less resources to properly maintain the housing structure, and are at greater risk for foreclosure, eviction, and Building Standards Commission or Code Enforcement actions. The City’s goal is to collaborate with public and private entities to ensure programs and services are in place to ameliorate the negative impacts of elevated cost burdens on low- and moderate-income homeowners, buyers and renters.

**Cost of Housing**

	<b>Base Year: 2009</b>	<b>Most Recent Year: 2015</b>	<b>% Change</b>
Median Home Value	103,600	119,500	15%
Median Contract Rent	543	632	16%

**Table 3 – Cost of Housing**

**Data** 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

**Source:**

<b>Rent Paid</b>	<b>Number</b>	<b>%</b>
Less than \$500	4,260	27.5%
\$500-999	9,210	59.4%
\$1,000-1,499	1,353	8.7%
\$1,500-1,999	480	3.1%
\$2,000 or more	200	1.3%
<b>Total</b>	<b>15,503</b>	<b>99.9%</b>

**Table 4 - Rent Paid**

**Data** 2011-2015 ACS  
**Source:**  
**Housing Affordability**

<b>% Units affordable to Households earning</b>	<b>Renter</b>	<b>Owner</b>
30% HAMFI	570	No Data
50% HAMFI	2,995	1,710
80% HAMFI	9,470	3,954
100% HAMFI	No Data	5,428
<b>Total</b>	<b>13,035</b>	<b>11,092</b>

**Table 5 – Housing Affordability**

**Data** 2011-2015 CHAS  
**Source:**

**Monthly Rent**

<b>Monthly Rent (\$)</b>	<b>Efficiency (no bedroom)</b>	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>3 Bedroom</b>	<b>4 Bedroom</b>
Fair Market Rent	660	767	911	1,317	1,600
High HOME Rent	660	767	911	1,125	1,235
Low HOME Rent	600	642	771	890	993

**Table 6 – Monthly Rent**

**Data** HUD FMR and HOME Rents  
**Source:**

The FY 2020 College Station-Bryan, TX MSA FMRs for All Bedroom Sizes

<b>Final FY 2020 &amp; Final FY 2019 FMRs By Unit Bedrooms</b>					
<b>Year</b>	<b>Efficiency</b>	<b>One-Bedroom</b>	<b>Two-Bedroom</b>	<b>Three-Bedroom</b>	<b>Four-Bedroom</b>
FY 2020 FMR	\$682	\$791	\$938	\$1,353	\$1,647
FY 2019 FMR	\$660	\$767	\$911	\$1,317	\$1,600

**Fair Market Rent Info for BCS MSA**

**Is there sufficient housing for households at all income levels?**

The 2011-2015 ACS 5-year estimate shows 28,925 occupied housing units in Bryan (46.3% owner-occupied and 53.7% renter occupied). Estimated vacancy rate is 11%. The median housing value is

\$119,500 and the median rent is \$632. There appears to be a sufficient number of affordable housing units, 24,127 units, (monthly owner/renter cost <30% AMI) for households with income limits up to 100% AMI. However, there are 7,285 renter households and 2,989 owner households that have monthly costs between 31% and 50% of the household's monthly income. Of more concern, there are 4,285 renter occupied units and 1,224 owner households with monthly costs greater than 50% of the household's monthly income. Based on reviewed data, there were 16,900 households below 100% AMI, and 12,025 above 100% AMI. 2011-15 ACS data shows 13,410 owner-occupied homes, a slight increase of 118 units (.9%) since the 2007-11 ACS data.

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

The Housing Affordability Index from the Real Estate Center at Texas A&M University reflects the ratio of median family income to the income required to qualify for a fixed-rate mortgage loan at an 80% loan to value to purchase the median-priced home; the higher the affordability index, the more affordable the Multiple Listing Service (MLS) Area. A ratio of 1.00 means the median family income is exactly equal to the required income to purchase the median-priced home in the area. Affordability increases as the required qualifying income decreases relative to the median family income. Data from 2015 through 2018 indicate that the College Station-Bryan MSA Texas Housing Affordability Index declined, from 1.61 to 1.35, indicating that homes have become more affordable to buyers during the period. This is primarily attributable to increases in median income for the MSA. According to data from the Center, median household income rose from \$62,000 in 2015, to \$73,900 in 2018 (a 19% increase in income from 2015). According to the Bryan-College Station Association of Realtors, as of May 2020, the median home price in Bryan was \$198,200, down slightly by .09% since May 2019, with active listings increasing by 30.2% year-over-year to 388, and experiencing longer days on the market than a year ago, by 18 more days to a total of 105 days on average. Months of inventory also ticked up, from 3.6 months in May 2019, to 4.5 months currently. This data indicates a stable homebuyer market, in spite of recent economic upheavals. The most recent median family income by HUD for the MSA is now \$65,600 for 2020, returning to near-2015 levels. Given the recent decline in household incomes related to the COVID1-19 pandemic, historically low oil prices and interest rates, home purchase prices will likely experience continued downward pressure until these effects pass, and affordability is likely to be maintained. Renters are expected to experience similar circumstances, as a large number of students normally attending Texas A&M University have returned to their hometowns to participate in distance education. This has resulted in unexpected large, but undetermined rental vacancies, which will likely keep rental rates affordable for those tenants not experiencing job or wage losses. According to the Texas A&M Real Estate Center, as of the fourth quarter of 2019, the most recent data available, the College Station-Bryan MSA was experiencing on average less than 2% rent increases, with less than 4% increase in occupancy. This indicates a fairly balanced rental market at that time.

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

The Real Estate Center at Texas A&M University published a 2018 analysis of rent affordability by metro areas. The College Station-Bryan MSA scored the highest median-rent-to-median-income percentage in the entire state, at 35.5% median rent as a percentage of median income. The Center attributes this to the large number of low-income student renter households in the local market. The median monthly rent in the MSA was \$917 during 2018 according to the study, an increase of 9.3% since 2013. The currently published Fair Market Rents are based on the ACS 2017 5-year data. The current FMR 2-bedroom rent for

FY 2020 is \$938 (the same as the current high HOME rent), a moderate 2.2% increase since 2018. This data may indicate that the current affordable rental housing market is adequately supplied.

## **Discussion**

HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing costs. If the household spends more than 30% of its income on housing costs, the household is considered to be cost-burdened. Cost burdened households have less financial resources to meet other basic needs (food, clothing, transportation, medical, etc.) less resources to properly maintain the housing structure, and are at greater risk for foreclosure, eviction, and housing orders from the City Property Maintenance Division.

Data clearly identifies housing affordability as a need for both renters and owners in Bryan. Local non-profit and for-profit developers, in partnership with the City, will be needed to develop strategies to address housing affordability. Along with public and private affordable housing partners, the City of Bryan will utilize its CDBG and HOME funded housing programs to meet the affordable housing needs of Bryan residents.

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

### **Introduction**

The 2011-15 CHAS indicated that there were 175 substandard rental units (.05%) lacking complete plumbing or kitchen facilities, and 14 substandard owner-occupied units (.04%), for a total of 189 substandard units (.6%). This represents a decrease from the 244 substandard units indicated by the 2007-2011 CHAS data (140 rental, 104 owner), particularly in the owner units, which declined substantially (86% reduction). This reflects the efforts of strong public and private renovation programs for owner-occupied housing. Substandard rental units exhibited a 25% increase.

## **2020 Housing Market Analysis – Condition of Housing**

### **Data and Sorting**

City staff reviewed 2019 BCAD data on over 31,400 residential units. Single-family units were analyzed by sorting data based on several BCAD categories: year built, improvement class, depreciation, and adjusted percent-good. “Plex” type units (duplex, triplex, etc.) units were sorted and analyzed by similar BCAD data categories, while apartments were sorted and analyzed using Marshal & Swift calculations for the remaining percent of depreciation substituted for the adjusted percent-good calculation used for non-apartment dwellings.

The sorting allowed the categorization of units as: Excellent, Good, Conservable, Substandard, and Dilapidated. While the sorting parameters were useful, individual units satisfying a specific category occasionally are found to have extenuating factors suggesting another category. An example is a unit with a higher quality construction rating and a very recent BCAD construction date (i.e. 2018), but a very low

“adjusted percent good” rating (i.e., 10%). This is often determined to be a unit that is still under construction. Very few of these type situations were found and no measureable impact on overall results are anticipated.

Based on this review of BCAD’s 2019 certified property roles, it is estimated that within Bryan city limits 7,486 residential units, in all categories, are likely in excellent condition. Note that a relatively high number of apartment units are rated as excellent condition, likely because many apartment units are relatively new with a majority of those listed below having been built in the last 10 years. 3,044 traditional single-family structures are also rated as excellent condition, also mostly newer and higher quality construction. The review findings for good and conservable ratings are also listed below by unit type. Relative to units identified as substandard or dilapidated, it is estimated that 1,811 substandard (*but not dilapidated*) structures exist within Bryan city limits, and 946 additional dilapidated residential units. The total of properties in these two categories is 2,757 and are listed below by type of units and resulting totals.

**The totals for all 31,407 units reviewed by condition rating follow (numbers are approximate):**

**Excellent (23.8%)** 4,412 - apartment units in 29 different properties  
Total - 7,486 30 - duplex, triplex, fourplex or other similar units  
3,044 - traditional single-family structures

**Good (28.4%)** 1,641 - apartment units in 11 different properties  
Total - 8,919 205 - duplex, triplex, fourplex or other similar units  
7,073 - traditional single-family structure

**Conservable (39.0%)** 2,913 - apartment units in 29 different properties  
Total - 12,245 993 - duplex, triplex, fourplex or other similar units  
8,339 - traditional single-family structures

**Substandard (5.8%)** 928 - apartment units in 29 different properties  
Total - 1,811 62 - duplex, triplex, fourplex or other similar units  
821 - traditional single-family structures (see note below)

**Dilapidated (3.0%)** 779 - apartment units in 5 different properties  
Total - 946 7 - duplex, triplex, fourplex or other similar units  
160 - traditional single-family structures (see note below)

**NOTE:** Of the 821 substandard single-family structures, only 274 appear to be homesteads. Likewise, only 19 of the dilapidated single-family structures appear to be homesteads.

**Definitions**



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

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

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

#### **Following are definitions from the City of Bryan’s 2019 Annual Action Plan**

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

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

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

**Substandard - Not Suitable for Rehabilitation (Non-Rehabable, Dilapidated):**  
(For the purposes of Section 104(d) of the Housing and Community Development Act)

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

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

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

## Conclusions

In late summer and early fall of 2019, the city’s CDS Department received, sorted, and analyzed over 31,400 residential properties to assess the overall property conditions and identify needed programmatic remedies. Given the demands, and limitation, on local and federal funding it appears program and incentive efforts should be directed at conditions that erode neighborhood safety and integrity – specifically substandard and dilapidated housing units.

Efforts should include housing repair, rehabilitation, and replacement as well as demolition assistance and development of new affordable housing. When possible, program assistance should also promote the continued maintenance of housing units currently determined to be rated conservable, to preclude them from falling into a substandard condition. Continuing CDS owner-occupied housing assistance using federal grant funds is warranted, while efforts to address dilapidated and vacant single-family units is best addressed by both the city’s Building and Standard’s Commission (BSC) and the CDS federal grant efforts.

The entire community benefits when residents have access to decent and affordable housing and when dilapidated structures – particularly vacant ones – are removed and replaced with new, efficient, and affordable dwellings. Given the numbers of potentially substandard and dilapidated units identified, and the limited resources available, BSC and CDS programs should continue focusing on these properties.

## Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,230	24%	7,235	47%
With two selected Conditions	190	1%	560	4%
With three selected Conditions	0	0%	45	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	9,985	74%	7,675	49%
<b>Total</b>	<b>13,405</b>	<b>99%</b>	<b>15,515</b>	<b>100%</b>

**Table 7 - Condition of Units**

**Data** 2011-2015 ACS

**Source:**

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,700	20%	4,369	28%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
1980-1999	4,225	32%	5,640	36%
1950-1979	5,240	39%	4,810	31%
Before 1950	1,235	9%	705	5%
<b>Total</b>	<b>13,400</b>	<b>100%</b>	<b>15,524</b>	<b>100%</b>

**Table 8 – Year Unit Built**

**Data** 2011-2015 CHAS

**Source:**

**Risk of Lead-Based Paint Hazard**

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	6,475	48%	5,515	36%
Housing Units build before 1980 with children present	3,429	26%	1,424	9%

**Table 9 – Risk of Lead-Based Paint**

**Data** 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

**Source:**

**Need for Owner and Rental Rehabilitation**

It appears from the data above that 25% of owner units have reportable conditions and may need repairs, while 59% of renter units have conditions reported on the American Community Survey (HUD's data source for this document). While the City concentrates CDBG/HOME funds in owner occupied housing programs, staff provides technical assistance and guidance to landlords seeking to upgrade rental properties. The owner demographics also show that households who are low-income and moderate-income may live in housing units that have housing problems in which the owner is unable to repair due to a financial hardship. These circumstances can affect the health and safety of elderly residents. Many such residents of Bryan have relied on the City for minor home repair assistance (includes immediate health/safety concerns), lead based paint removal, accessibility for disabled residents, and major rehabilitation and reconstruction needs. As noted earlier, BCAD data was analyzed and, based on that analysis, it's estimated that approximately 1,800 Substandard owner and rental structures exist within the city limits of Bryan. It's also estimated that approximately 160 single-family and approximately 800 dilapidated rental structures exist within Bryan.

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

The data shows that the number of housing units in Bryan built prior to 1980, potentially where lead-based paint hazards might be found, include 39% of all owner housing and 31% of rental housing. In all 26% of owner housing units and 9% of rental housing units built prior to 1980 are occupied by families with children present, a total of 4,853 housing units. As housing units and neighborhoods age, they are typically passed down from middle or moderate-income households to lower income households. Neighborhoods that were once occupied by moderate-income groups are inherited by lower income groups as they age. As a result, it is reasonable to assume that most of the 4,853 units in Bryan built prior to 1980 are occupied by families with children are likely occupied by low or moderate-income families.

## Discussion

The City of Bryan’s collaboration with the Brazos County Appraisal District allow the City to assess local property conditions, to plan and develop effective programs to address housing needs locally. Efforts over the CP’s five-year period will involve partnerships with other local private and public housing providers and will combine federal grant funds with other leveraged resources. The sorting and analysis of over 31,400 residential properties to assess the overall property conditions and identify needed programmatic remedies. Given the demands, and limitation, on local and federal funding it appears program and incentive efforts should be directed at conditions that erode neighborhood safety and integrity – specifically substandard and dilapidated housing units.

Rating	Median Multiple
Severely Unaffordable	5.1 & Over
Seriously Unaffordable	4.1 to 5.0
Moderately Unaffordable	3.1 to 4.0
Affordable	3.0 & Under

Source: Demographia International Housing Affordability Survey

Median Home Price Divided by Median Income (March 2020 Data):

- Bryan (\$200,000/\$44,700) = 4.47 – Seriously Unaffordable to most households
- Brazos County (\$235,000/\$46,839) = 5.02 – Severely Unaffordable to most households
- College Station (\$245,000/\$42,964) = 5.70 – Severely Unaffordable to most households
- CS/B MSA Family (\$224,900/\$65,600) = 3.42 – Moderately Unaffordable to most families

The monthly mortgage payment and minimum annual income necessary for a \$160,000 home at the current market interest rate (3.5%) for a 30-year term with varying down payments in Bryan, including Principal, Interest, Taxes (city, county, and school district, including the Homestead Exemption) and Insurance (PITI), and mortgage interest (for down payment amounts less than 20%):

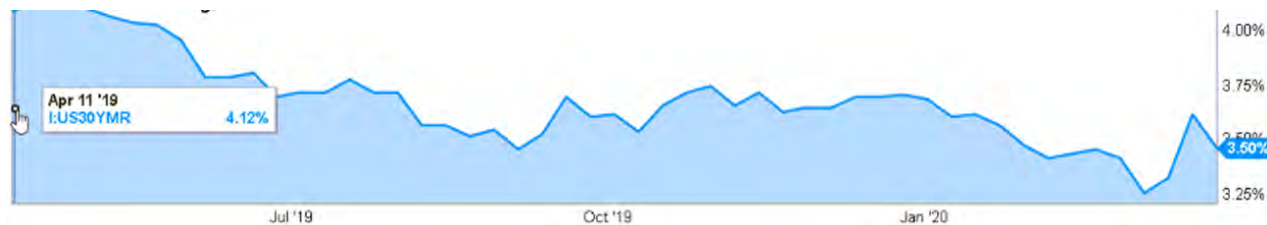
Interest Rate: 3.5%	3.5% Down (\$5600) FHA	5% Down (\$8,000)	10% Down (\$16,000)	15% Down (\$24,000)	20% Down (\$32,000)
<b>Monthly Mortgage Payment</b>	\$1,231	\$1,186	\$1,145	\$1,105	\$986
<b>Minimum Annual Income to Qualify</b>	\$45,644	\$45,178	\$43,626	\$42,073	\$36,588

Interest Rate: 6.0%	3.5% Down (\$5600) FHA	5% Down (\$8,000)	10% Down (\$16,000)	15% Down (\$24,000)	20% Down (\$32,000)
<b>Monthly Mortgage Payment</b>	\$1,231	\$1,186	\$1,145	\$1,105	\$986
<b>Minimum Annual Income to Qualify</b>	\$45,644	\$45,178	\$43,626	\$42,073	\$36,588

<b>Monthly Mortgage Payment</b>	\$1,470	\$1,417	\$1,365	\$1,313	\$1,182
<b>Minimum Annual Income to Qualify</b>	\$44,763	\$43,122	\$41,648	\$40,173	\$35,867
<b>Payment Increase from 3.5% to 6.0%</b>	\$239	\$232	\$220	\$208	\$196
<b>Percentage Increase</b>	19.44%	19.53%	19.18%	18.81%	19.86%

The interest rate for a 30-year fixed-rate mortgage is down from 4.12% a year ago, to 3.5% (national average) today



[https://ycharts.com/indicators/30\\_year\\_mortgage\\_rate](https://ycharts.com/indicators/30_year_mortgage_rate)

Each quarter-point swing in interest rates, up or down, changes the amount a borrower can afford by about 3%. If rates were to increase by 1 full percentage point, then a borrower would have to decrease the amount financed by about 12% to achieve the same monthly payment.

Historic Trend: Home prices in the community continue to outpace household income. Since 2011, median household income in Bryan has increased approximately \$1,260 per year, or 3.51% per year on average (US Census ACS). During the same period, median home sale prices in the College Station-Bryan MSA have increased on average \$8,500 per year, or 6.64%, (Real Estate Center, Texas A&M University).

Median Home Price	2011	2012	2013	2014	2015	2016	2017	2018	2019	% Change	AVG % Increase	AVG \$ Increase/Yr
CS-Bryan MSA	\$128,000	\$130,000	\$135,000	\$144,000	\$160,000	\$174,900	\$181,500	\$198,000	\$196,000	53.13%	6.64%	\$8,500

**Homeownership:** Bryan's current Homeownership Rate of 47.4% significantly lags both the state (61.9%) and the nation (63.8%), according to the 2014-18 ACS data. While Bryan's homeownership rate is falling (-1.66% since 2010), its homeownership rate currently exceeds that of College Station (36.6%), however, the homeownership rate in College Station is increasing significantly (+10.24% since 2010)

### Takeaways:

- **Homeownership Affordability Improvement:** Affordable homeownership opportunities have improved slightly in Bryan as additional affordable inventory has entered the market and interest rates have decreased. Developers have recognized the demand for lower cost workforce housing, and have responded by increasing supply. Because land cost is a significant cost factor, most new lower cost workforce homes have been developed in locations that are not currently in areas of high consumer demand.
- **Income Lags,** but was improving prior to the coronavirus pandemic and collapse of the oil market: The median household income is no longer increasing at the previous rate, the home buying power of the median income lags the median home price, and the homebuyer market is swinging more toward equilibrium.
- **Role of Local Government:** A sufficient supply of modestly priced, affordable workforce housing promotes economic development by attracting businesses. Toward that end, the City should work to enact policies which promote and facilitate efficient use of the land with only those regulatory barriers necessary to accomplish orderly, market-driven development, and should incentivize the

development of workforce housing in areas that are easily accessible to major employers, transportation, and retail.

**Restricted Rental Units for Tenants Generally Earning 60% AMI or Less:**

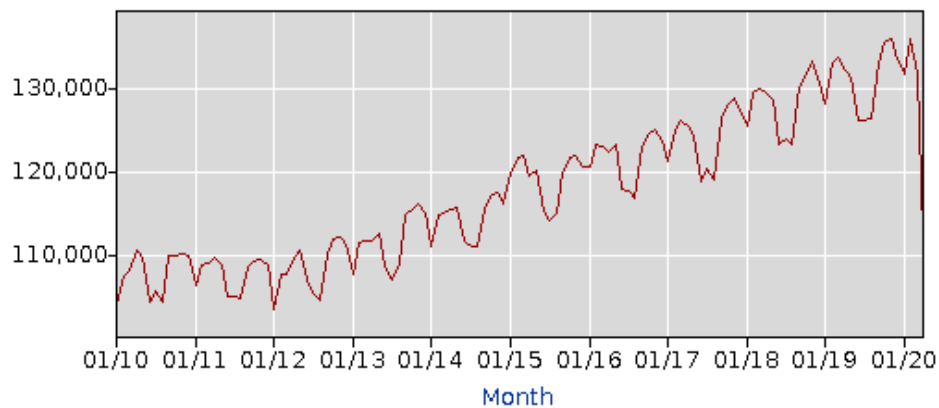
Property	Type	Total Units	Restricted Affordable	Vacancies	% Vacant
<b>Forest Park Apartments</b> 1828 Sandy Point Rd	LIHTC - General	140	119	2	1.43%
<b>Highland Villas</b> 2900 Wildflower Dr	LIHTC - General	180	180	0	0.00%
<b>Mid Towne Apartments</b> 2728 Osborn Ln	LIHTC - Elderly	148	141	1	0.68%
<b>Mid Towne FKA Emerald Park</b> 200 Rebecca	LIHTC - General	64	48	0	0.00%
<b>Saddlewood Club</b> 3625 Wellborn Rd	LIHTC - General	232	232	2	0.86%
<b>Sterling Park Square</b> 1201 N Sims Ave	HOME - TDHCA	14	14	1	7.14%
<b>Elder Aid</b> 307 S Main St. 202	HOME - COB - Elderly	18	18	0	0.00%
<b>Crestview Terrace</b> 2501 E Villa Maria	HUD Sec. 202 - Elderly	100	100	0	0.00%
<b>Crestview Place</b> 2503 E. Villa Maria	HUD Sec. 202 - Elderly	44	44	0	0.00%
<b>Crestview Unity</b> 2507 E Villa Maria	HUD Section 8 Project Based	63	63	0	0.00%
<b>Bryan Housing Authority</b> 1306 Beck St	Public Housing	300	300	9	3.00%
		<b>TOTAL</b>	<b>1,303</b>	<b>15</b>	<b>1.19%</b>
<b>BVCOG Sec. 8 Housing Vouchers</b>	Sec. 8 (Bryan units vary, 1,045 as of 6/13/17) 1900 total				
(Note, may be used in any of the above (Except BHA) or any other rental property in the community accepting vouchers)					

**Temporary Emergency Tenant Based Rental Assistance Program:** In response to the coronavirus pandemic, for tenant households in the City of Bryan, the City has funded TBRA assistance grants to fund rent, security deposits, and utilities (for those also eligible for rent assistance) for a primary residence, based on household need for eligible tenant households earning up to 60% of AMI. Funds are provided from the City’s HOME Investment Partnerships Program grant from the U.S. Department of Housing and Urban Development (HUD) to the extent budgeted until December 31, 2020 (unless the program is extended) through a tri-party agreement with the City, tenant, and landlord. The program utilizes TBRA programmatic waivers by the Secretary of HUD.

## Employment Opportunities

- Employment Opportunities:** In May 2020, the Department of Labor Bureau of Labor Statistics shows an unemployment rate for the College Station-Bryan MSA of 8.9%, a large increase from previous historic low unemployment rates. of approximately 3.4% in December 2019. The local employment market is reacting to pressure from the COVID-19 social distancing requirements, and a severe oil price reduction shock. According to BLS there are currently over 112,100 persons employed within the College Station-Bryan MSA (out of 123,000 labor force).

### employment



- Creation of Job Opportunities:** Each year, Texas A&M University employs 2,500 faculty members conducting approximately \$500 million worth of sponsored research projects, assisted by more than 5,000 paid graduate students. Additionally, approximately 3,000 undergraduates each year also conduct independent research with faculty supervision. Local oil and gas employment opportunities are usually robust, although the recent decline in oil prices has negatively impacted opportunities in this sector.

Employment by Industry (May 2020)			
Industry	May-20	% Monthly Change	% Yearly Change
Total Nonfarm	119,300	1.6%	-3.5%
Mining, Logging and Construction	8,300	5.1%	7.8%
Manufacturing	6,100	3.4%	-1.6%
Trade, Transportation, and Utilities	16,300	1.2%	-2.4%
Information	1,300	0.0%	-7.1%
Financial Activities	4,200	10.5%	5.0%
Professional and Business Services	9,200	1.1%	-5.2%
Education and Health Services	12,200	3.4%	-3.2%
Leisure and Hospitality	15,500	6.9%	-8.3%
Other Services	2,900	7.4%	-14.7%
Government	43,300	-2.3%	-3.8%

Source: TWC, <https://texaslmi.com/EconomicProfiles/MSAProfiles>



# Economy at a Glance



## College Station-Bryan, TX

### College Station-Bryan, TX

Data Series	Back Data	Dec 2019	Jan 2020	Feb 2020	Mar 2020	Apr 2020	May 2020
<b>Labor Force Data</b>							
Civilian Labor Force <sup>(1)</sup>	✓	(2) 137.1	135.8	140.0	137.3	(P) 123.0	
Employment <sup>(1)</sup>	✓	(2) 133.7	131.9	136.2	131.9	(P) 112.1	
Unemployment <sup>(1)</sup>	✓	(2) 3.4	4.0	3.8	5.4	(P) 10.9	
Unemployment Rate <sup>(3)</sup>	✓	(2) 2.5	2.9	2.7	3.9	(P) 8.9	
<b>Nonfarm Wage and Salary Employment</b>							
Total Nonfarm <sup>(4)</sup>	✓	126.0	123.4	127.4	127.0	117.4	(P) 119.3
12-month % change	✓	2.0	3.2	2.4	1.5	-5.1	(P) -3.5
Mining, Logging, and Construction <sup>(4)</sup>	✓	7.8	7.7	7.7	7.7	7.9	(P) 8.3
12-month % change	✓	-1.3	-1.3	-3.8	-2.5	2.6	(P) 7.8
Manufacturing <sup>(4)</sup>	✓	6.2	6.3	6.3	6.3	5.9	(P) 6.1
12-month % change	✓	5.1	6.8	6.8	3.3	-3.3	(P) -1.6
Trade, Transportation, and Utilities <sup>(4)</sup>	✓	17.3	17.0	17.2	16.9	16.1	(P) 16.3
12-month % change	✓	1.2	3.0	3.0	3.0	-4.2	(P) -2.4
Information <sup>(4)</sup>	✓	1.4	1.4	1.4	1.4	1.3	(P) 1.3
12-month % change	✓	0.0	7.7	7.7	0.0	-7.1	(P) -7.1
Financial Activities <sup>(4)</sup>	✓	3.9	3.9	3.9	3.9	3.8	(P) 4.2
12-month % change	✓	0.0	0.0	0.0	0.0	-2.6	(P) 5.0
Professional and Business Services <sup>(4)</sup>	✓	10.2	9.9	10.1	10.1	9.1	(P) 9.2
12-month % change	✓	7.4	10.0	9.8	8.6	-6.2	(P) -5.2
Education and Health Services <sup>(4)</sup>	✓	12.8	12.7	13.0	13.2	11.8	(P) 12.2
12-month % change	✓	0.8	1.6	2.4	3.9	-6.3	(P) -3.2
Leisure and Hospitality <sup>(4)</sup>	✓	18.0	17.3	18.1	17.1	14.5	(P) 15.5
12-month % change	✓	2.3	3.6	2.8	-2.3	-18.1	(P) -8.3
Other Services <sup>(4)</sup>	✓	3.5	3.4	3.4	3.3	2.7	(P) 2.9
12-month % change	✓	2.9	6.3	3.0	0.0	-20.6	(P) -14.7
Government <sup>(4)</sup>	✓	44.9	43.8	46.3	47.1	44.3	(P) 43.3
12-month % change	✓	1.8	2.3	1.1	1.1	-0.2	(P) -3.8

- **Barriers to Job Opportunities:** Current known barriers to job opportunities in Bryan include social distancing requirements, limited re-openings, and business failures related to the COVID-19 pandemic. Also, the oil market price declines have severely impacted a formerly robust oil and gas employment sector. Texas A&M University as a stabilizing factor, however distance education has negatively impacted the local economy because students have not fully returned to campus.
  - **Incentives for Corporate Relocation:** The City of Bryan incentive program is designed to encourage targeted business growth and development. Qualified economic development prospects creating significant capital investment, employment and payroll may be eligible for incentives tailored to individual business needs. Incentives may include:
    - **Tax Abatements** - An abatement of ad valorem taxes for a period of up to 10 years on increase of value on real and/or personal property.
    - **Land at Reduced Prices or Land Grants** - A reduction in price for property or the grant of land.
    - **Waiver of Select Municipal Permits and Fees** - Certain municipal fees may be waived on items such as tap and meter fees and construction permits.
    - **Fast Track Permitting** - The development process may be expedited through predevelopment and other special-called meetings, slab only permitting, etc.
    - **Grants** - Various grants tailored to business needs.
    - **Tax Increment Financing (TIF)** - Tax increment financing of public improvements to provide water and wastewater lines, roads, and other improvement projects deemed necessary for development.



- **CDBG Funding of Infrastructure for New Business Development:** The City of Bryan CDBG funds have been used for infrastructure development in low and moderate-income areas of the City. The most recent development was the installation of sidewalks along a 2.5-mile length of Martin Luther King Jr. Street utilizing CDBG-R funding. These infrastructure improvements help to improve pedestrian access to retain business and attract new employers as well.
- **Job Training Programs:**
  - Workforce Training - Workforce training assistance can be provided through:
    - Brazos Valley Community Action Agency JOBS Program
    - Texas Department of Economic Development Smart Jobs program
    - Blinn College – Bryan Campus
    - Texas Engineering and Extension Service (TEEX)
    - Brazos Valley Council of Governments Workforce Center
- **Welfare to Work Programs (State/Local/CDBG Funding):** The State of Texas Department of Health and Human Services and the Texas Workforce Commission provide welfare to work programs.
- **Evaluation of Employment Opportunities:** The College Station-Bryan Metropolitan Statistical Area is expected to return to moderate growth once the COVID-19 crisis has passed.

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

#### College Station-Bryan MSA Major Employers

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

Source: BLS

## Educational Opportunities

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

### BISD School District Profile

According to the Texas Tribune, as of the **2018-2019 school year**, the district had **15,906 students**. The school received an accountability rating of **C**. **70.1%** of students were considered at risk of dropping out of school. **27.1%** of students were enrolled in bilingual and English language learning programs. An average teacher's salary was **\$47,438**, which is **\$6,684 less** than the state average. On average, teachers had **9.3 years** of experience. The average SAT score at Bryan ISD was **1033**. The average ACT score was **21.1**. In the Class of 2018, **86.6%** of students received their high school diplomas on time or earlier. The dropout rate was **2.2%**.

### Fast Facts

Size	453 square miles
Enrollment 19-20	16,137
Expenditure per student	\$11,591
Total expenditures	\$188,752,336
Property value per student	\$554,840
2020 tax rate	\$1.27 per \$100 assessed valuation

**Source:** Bryan Independent School District

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

## **Blinn College – Bryan, Texas Campus**

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

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

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

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

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

## **Transportation Networks**

### **Air Service**

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

### **Freight Carriers**

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

### **Rail Service Provider:**

Union Pacific

### **Highway / Public Transit**

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

- **Availability - City vs. Suburbs and within the City:** Transportation networks are easily accessible and available throughout the community. In addition, public transit busses are provided by the Brazos

Transit System (The District) and Texas A&M University. Bryan has also been nationally recognized for its dedication to providing a large network of bikeways throughout the city.

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

## **Fair Housing Complaint Profile**

**Fair Housing Complaints:** There have been few fair housing complaints in the City of Bryan. For the 2015-2019 reporting period to date, no data regarding discrimination cases was provided to the City by HUD FHEO or the Texas Workforce Commission Civil Rights Division. Two requests were made of each agency, the first on January 7, 2020, and second on June 4, 2020. This analysis will be updated if and when responses to these requests are received. During previous reporting period, there were 15 discrimination complaints. All complaints related to discrimination in rental. More than half of these were related to discrimination based upon rental terms, conditions, or facilities. The primary basis for discrimination complaints was disability (28%), followed by family status and race (20% each). All cases were found to be without cause, withdrawn, or dismissed.

- **Documentation of Fair Housing Complaints:** The following table illustrates the fair housing complaints within the jurisdictional boundaries of the City of Bryan.

**2010-14 Fair Housing Complaint Profile Table**

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

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

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

## Identification of Actions Initiated Within Jurisdiction

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

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

## Fair Housing Education Programs

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

## Fair Housing Enforcement and Monitoring Provisions

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




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

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

## Population Profiles

All Topics	Bryan city, Texas
<b>Population estimates, July 1, 2019, (V2019)</b>	<b>86,276</b>
<b>PEOPLE</b>	
<b>Population</b>	
<b>Population estimates, July 1, 2019, (V2019)</b>	<b>86,276</b>
Population estimates base, April 1, 2010, (V2019)	76,226
Population, percent change - April 1, 2010 (estimates base) to July 1, 2019, (V2019)	13.2%
Population, Census, April 1, 2010	76,201
<b>Age and Sex</b>	
Persons under 5 years, percent	▲ 7.5%
Persons under 18 years, percent	▲ 24.0%
Persons 65 years and over, percent	▲ 10.2%
Female persons, percent	▲ 49.8%
<b>Race and Hispanic Origin</b>	
White alone, percent	▲ 69.9%
Black or African American alone, percent (a)	▲ 16.2%
American Indian and Alaska Native alone, percent (a)	▲ 0.2%
Asian alone, percent (a)	▲ 1.9%
Native Hawaiian and Other Pacific Islander alone, percent (a)	▲ 0.0%
Two or More Races, percent	▲ 4.3%
Hispanic or Latino, percent (b)	▲ 39.5%
White alone, not Hispanic or Latino, percent	▲ 40.2%
<b>Population Characteristics</b>	
Veterans, 2014-2018	3,321
Foreign born persons, percent, 2014-2018	15.0%
<b>Housing</b>	
Housing units, July 1, 2019, (V2019)	X
Owner-occupied housing unit rate, 2014-2018	47.4%
Median value of owner-occupied housing units, 2014-2018	\$135,500 \$1,278

Median selected monthly owner costs -with a mortgage, 2014-2018	
Median selected monthly owner costs -without a mortgage, 2014-2018	\$503
Median gross rent, 2014-2018	\$892
Building permits, 2019	X
<b>Families &amp; Living Arrangements</b>	
Households, 2014-2018	29,985
Persons per household, 2014-2018	2.63
Living in same house 1 year ago, percent of persons age 1 year+, 2014-2018	74.7%
Language other than English spoken at home, percent of persons age 5 years+, 2014-2018	30.4%
<b>Computer and Internet Use</b>	
Households with a computer, percent, 2014-2018	89.3%
Households with a broadband Internet subscription, percent, 2014-2018	79.5%
<b>Education</b>	
High school graduate or higher, percent of persons age 25 years+, 2014-2018	79.2%
Bachelor's degree or higher, percent of persons age 25 years+, 2014-2018	26.0%
<b>Health</b>	
With a disability, under age 65 years, percent, 2014-2018	7.9%
Persons without health insurance, under age 65 years, percent	▲ 21.1%
<b>Economy</b>	
In civilian labor force, total, percent of population age 16 years+, 2014-2018	63.8%
In civilian labor force, female, percent of population age 16 years+, 2014-2018	60.7%
Total accommodation and food services sales, 2012 (\$1,000) (c)	114,957
Total health care and social assistance receipts/revenue, 2012 (\$1,000) (c)	626,746
Total manufacturers shipments, 2012 (\$1,000) (c)	928,524
Total merchant wholesaler sales, 2012 (\$1,000) (c)	864,923
Total retail sales, 2012 (\$1,000) (c)	1,271,333
Total retail sales per capita, 2012 (c)	\$16,286
<b>Transportation</b>	
Mean travel time to work (minutes), workers age 16 years+, 2014-2018	16.5
<b>Income &amp; Poverty</b>	
Median household income (in 2018 dollars), 2014-2018	\$44,700
Per capita income in past 12 months (in 2018 dollars), 2014-2018	\$24,111
Persons in poverty, percent	▲ 22.6%
<b> BUSINESSES</b>	
<b>Businesses</b>	
Total employer establishments, 2018	X
Total employment, 2018	X
Total annual payroll, 2018 (\$1,000)	X
Total employment, percent change, 2017-2018	X

## Appendix – A City of Bryan Fair Housing Ordinance

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

#### FAIR HOUSING

Sec. 58-40. Declaration of policy.

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

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

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

(1) Pregnant;

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

a. Is the parent or legal custodian; or

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

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

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

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

Sec. 58-41. Definitions.

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

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

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

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

*Family* shall include a single individual.

*Person* shall mean:

(1) An individual;

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Sec. 58-45. Exemptions and exclusions.**

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

- (1) Any single-family house sold or rented by an owner; provided, that such private individual owner does not own more than three such single-family houses, wherever located, at any one time; provided further, that in the case of the sale of any such single-family house by a private individual owner not residing in such house at the time of such sale or who was not the most recent resident of such house prior to such sale, the exemption granted by this subsection shall apply only with respect to one such sale within any 24-month period; provided further, that such bona fide private individual owner does not own any interest in nor is there owned or reserved on his or her behalf, under any express or voluntary agreement, title to or any right

to all or a portion of the proceeds from the sale or rental of, more than three such single-family houses at any one time; provided further, the sale or rental of any such single-family house shall be excepted from the application of this title only if such house is sold or rented:

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

b. Without the publication, posting or mailing of any advertisement or written notice in violation of section 58-42(3); but nothing in this provision shall prohibit the use of attorneys, escrow agents, abstractors, title companies and other such professional assistance as necessary to perfect or transfer the title.

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

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

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

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

#### Sec. 58-46. Complaints.

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

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

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

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

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

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

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

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

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

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

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

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

#### Sec. 58-48. Unlawful intimidation.

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

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

#### Sec. 58-49. Penalties.

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

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

## APPENDIX B ZONING RECLASSIFICATION MU-1 TO RD-5 DETAIL HISTORY

### EXCERPT FROM MARCH 28, 2019 PLANNING AND ZONING COMMISSION SPECIAL MEETING MINUTES:

#### 3. PROPOSED AMENDMENTS TO THE TEXT OF BRYAN'S CODE OF ORDINANCES – A PUBLIC HEARING WILL BE HELD FOR EACH ITEM (Commission makes recommendation; City Council has final approval).

##### a. Bryan Code of Ordinances, Chapter 130 - Zoning

Proposed Public hearing, presentation, and consideration of an ordinance to amend the text of the Bryan Code of Ordinances, Chapter 130 – Zoning by eliminating all of Section 130-29 - Mixed Use Residential District (MU-1); converting the depiction of all parcels of land currently described on the Official Zoning District Map as MU-1 to Residential District – 5000 (RD-5); and removing all references to the Mixed Use Residential District (MU-1) from other parts of the City of Bryan Code of Ordinances, specifically Chapters 38 – Environment; 62 – Land and Site Development; 98 – Signs; and 118 – Traffic and Vehicles. (R. Haynes)

Mr. Haynes presented the proposed text amendments to the Bryan Code of Ordinances Chapter 130. Staff recommends approval of these amendments.

In response to questions from the Commission, Mr. Haynes stated that staff received numerous phone calls from citizens requesting further information about this proposal, and that public hearing notices were sent to property owners rather than tenants.

Commissioners Rodriguez and Gonzalez commented that:

- This proposal is the result of direction from the Bryan City Council, and substantial research completed by the subcommittee over the past year.
- Existing manufactured homes on lots zoned MU-1 will not be affected by this amendment.
- The Commission is very concerned with personal property rights, and this proposal only concerns vacant lots.

The public hearing was opened.

Mr. Dan Kiniry, 708 W 17<sup>th</sup> St, Bryan, TX, Mr. John McBride, 1143 Stanley Trail, Bryan, TX, Ms. LaKeisha Carroll, 2929 Stevens Dr, Bryan, TX, Mr. Byrrone Watson, 910 Harlem Ln, Bryan, TX, Ms. Erma Hemphill, 1809 Nevada St, Bryan, TX, Mr. Victor Thomas, 1802 Pin Oak, Bryan, TX, Mr. Steve Jones, 1708 Grant St, Bryan, TX, Mr. Roland Hickman, 1010 Suncrest St, Bryan, TX, Mr. Sedrick Gilbert, 600 N Sims Ave, Bryan, TX, Mr. Robert Patton, 3608 Elaine Dr, Bryan, TX, Mr. Larry Gilbert, 2902 SH-21 West, Bryan, TX, Mr. Sergio Aguilar, 2706 Allen Forest Dr, Bryan, TX, Mr. Darius McCoy, 1000 Henderson St, Bryan, TX, Ms. Kimberly Mooring, 4008 High St, Bryan, TX, Ms. Ashley Ivey, 4112 Lakeside Dr, Bryan, TX, Ms. Gwen Crawford, 904 Florida St, Bryan, TX, Mr. Robert Rose, 3201 Walnut Creek Ct, Bryan, TX, Ms. Chrissy Ransome, 4008 High St, Bryan, TX, Ms. Margaret Kennedy, 2905 Wood Knoll Dr, Bryan, TX, Ms. Debra Miller, 714 Williamson Dr, Bryan, TX, Mr. Glenn Newton, 1505 Clark St, Bryan, TX, Ms. Dimple Wilson Suseberry, 1404 Conroy St, Bryan, TX, Mr. Roy Flores, 507 E 31<sup>st</sup> St, Bryan, TX, Mr. Rafael Pena, 510 W 15<sup>th</sup> St, Bryan, TX, Mr. Josh Wilkerson, 2019 Chaparral Cir, Bryan, TX, Mr. Raul Santana, 104 S Sterling, Bryan, TX, Mr. Karl Radde, 2106 SH-21 East, Bryan, TX, and Ms. Patricia Thurber, 3608 Elaine Dr, Bryan, TX, came forward to speak in opposition to this proposal, citing the following concerns:

- Manufactured homes are a necessary affordable housing option in Bryan.
- This proposal should not be considered until other low-income housing options are available.
- Many residents desire to place manufactured homes on vacant MU-1 lots in the future to provide housing for family members.
- Stick-built housing is not a feasible rental or ownership option for many residents of Bryan.
- Manufactured home communities do not allow the same flexibility and quality of life as other residential neighborhoods, and charge rental fees even for owner-occupied homes.
- Infrastructure improvements are needed in many MU-1 neighborhoods.
- Manufactured housing can quality-built and well maintained.
- Bryan residents should have freedom to invest in the housing option of their choice.
- This proposal would further income disparity and promote socioeconomic segregation.
- Additional public meetings should be conducted before this proposal moves forward, and significant concern has already been expressed.
- Homeowners should be aware of land uses permitted in MU-1 at the time of purchase.
- This proposal infringes on personal and property rights.
- Manufactured homes offer many of the same amenities as stick-built homes.
- This proposal could discourage citizens from pursuing homeownership.
- This proposal has an immediate negative impact for residents that are currently working towards the purchase of a manufactured home.
- The data presented regarding homeownership statistics may be skewed.

Ms. Rebecca Crenshaw, 1602 Finfeather Rd, Bryan, TX, came forward to speak in favor of this proposal, stating that manufactured home communities promote a strong sense of community and can be an asset to the City of Bryan.

Chairman Gutierrez called the meeting into recess at 7:42pm.

Chairman Gutierrez called the meeting back into session at 7:49pm.

Commissioners Gonzalez, Rodriguez, Torres, and Gutierrez commented that:

- Existing manufactured homes in MU-1 districts will not be prohibited by this proposal.
- The proposed amendment includes a provision to allow residents who intend to place a manufactured home on a vacant MU-1 lot in the near future to do so.
- Asset appreciation and neighborhood integrity are serious concerns of the subcommittee.
- The City is considering options to incentivize stick-built housing and make this an option for more Bryan residents.
- The majority of manufactured homes in Bryan are rental properties.
- Dilapidated manufactured housing creates a safety issue.
- Manufactured housing lowers property values for surrounding properties.

The public hearing was closed.

**Commissioner Gonzalez moved to recommend approval of the proposed text amendments to the Bryan Code of Ordinances Chapter 130, Zoning, as presented. Commissioner Conlee seconded the motion.**



Commissioners thanked citizens for expressing their concerns and subcommittee members for their work in studying this issue, commenting that:

- This proposal does not prohibit existing manufactured homes or remove the option to replace them.
- Affordable housing is a serious concern in Bryan and should be an immediate focus of the City Council.
- MU-1 was implemented as a transitional zoning type and was intended to be reevaluated.
- Location and square footage drive rent prices for both stick-built and manufactured homes.
- Manufactured homes depreciate and typically have higher interest rates for financing, even though initial purchasing costs are lower.
- Manufactured homes have the same utility demands as stick-built homes, but do not produce the same property taxes.
- The intention of this amendment is to begin to build neighborhoods that citizens deserve and allow residents to protect their assets.

**The motion passed unanimously.**

## Agenda Item Details

<b>Meeting</b>	<b>Apr 09, 2019 - Bryan City Council Second Regular Meeting</b>
Category	4. Public Hearings and First and Only Readings of Ordinances - Open public hearing, hear citizen comments, close public hearing, staff presentation, and consider first and only reading of ordinance.
Subject	G. Public hearing, presentation, and consideration of an ordinance to amend the text of the Bryan Code of Ordinances, Chapter 130 – Zoning by eliminating all of Section 130-29 - Mixed Use Residential District (MU-1); converting the depiction of all parcels of land currently described on the Official Zoning District Map as MU-1 to Residential District – 5000 (RD-5); and removing all references to the Mixed Use - Residential District (MU-1) from other parts of the City of Bryan Code of Ordinances, specifically Chapters 38 – Environment; 62 – Land and Site Development; 98 – Signs; and 118 – Traffic and Vehicles.
Access	Public
Type	Action
Preferred Date	Apr 09, 2019
Absolute Date	Apr 09, 2019
Fiscal Impact	No
Budgeted	No
Recommended Action	Open public hearing, hear citizen comments, close public hearing. Motion to approve the first and only reading of an ordinance to amend the text of the Bryan Code of Ordinances, Chapter 130 – Zoning by eliminating all of Section 130-29 - Mixed Use Residential District (MU-1); converting the depiction of all parcels of land currently described on the Official Zoning District Map as MU-1 to Residential District – 5000 (RD-5); and removing all references to the Mixed Use Residential District (MU-1) from other parts of the City of Bryan Code of Ordinances, specifically Chapters 38 – Environment; 62 – Land and Site Development; 98 – Signs; and 118 – Traffic and Vehicles.

Goals; Economic Development Quality of Life

### **Public Content**

#### **SUMMARY STATEMENT:**

Chapter 5 of Bryan’s Comprehensive Plan, BluePrint 2040, concerns land use and begins with an explanation of how development has shaped the community. The Plan states in some older residential areas, decades of unregulated development has produced conditions that make beneficial change difficult. Recognizing the importance of neighborhoods as the fundamental fabric of the

community, in part BluePrint 2040 lays out a vision of the future intended to support reinvestment in Bryan's older neighborhoods. Specifically addressed in the plan is the issue of Mixed Use - Residential District (MU-1) zoning and manufactured housing on individual lots.

In the two years since its adoption by ordinance, BluePrint 2040 has guided land use decisions concerning development. To proactively implement an important part of the Plan intended to remove impediments to investment and cause positive change in older neighborhoods, on May 17, 2018, the Planning and Zoning Commission established a subcommittee to study conditions related to the manufactured housing and BluePrint 2040 recommendations. Since that date, the subcommittee has met on seven occasions to hear information gathered by staff and input from outside stakeholders and to discuss their findings and recommendations.

As observed in BluePrint 2040, manufactured housing is a major affordable housing resource for millions of people in the United States and has been a significant component of the local affordable housing market. Although at the time of initial sale, all manufactured houses must satisfy national construction and safety standards; however, despite the evident advantages of affordability and regulatory safeguards, manufactured housing is perceived by some to create negative effects on the community. Based on study of the facts as discovered and presented by staff and industry stakeholders, the subcommittee provided the following findings, recommendations, and considerations:

1. manufactured housing is a major affordable housing resource that must satisfy national construction and safety standards;
2. manufactured housing has been a significant component of the local affordable housing market;
3. there are common concerns about the quality, appearance, durability, lack of price appreciation of manufactured housing, and the perceived negative impact these factors have on neighboring property values;
4. such concerns are driven by the existence of dilapidated manufactured housing units that have, through normal wear and tear or lack of proper maintenance, passed the end of their service life but are still in use as dwellings;
5. continuing to allow the installation of manufactured homes on individual lots will create conditions having a long-term negative effect on the welfare of the public;
6. the Mixed Use - Residential District (MU-1), the only district that allows manufactured homes on individual lots by right, was established 30 years ago as a temporary district classification;
7. the zoning ordinance should be amended by eliminating the MU-1 District and converting all existing MU-1 properties to Residential District – 5000 (RD-5)
8. the conversion of MU-1 to RD-5 will effect approximately 2,606 properties;
9. the conversion of MU-1 to RD-5 will render approximately 750 existing manufactured homes a legal nonconforming use (grandfathered);
10. Owners of currently vacant MU-1 properties should be offered a brief (e.g., 90-day) opportunity to request from the P&Z approval of installation of a manufactured home for purposes of owner occupancy. Approval of such requests should be based on individual circumstances;
11. the City should consider establishing incentives to encourage owners to replace mobile/manufactured homes located on individual lots with site-built homes;
12. the conversion of MU-1 to RD-5 may reduce the availability of affordable housing; and

13. manufactured housing should be allowed in Bryan within licensed manufactured home communities.

The Planning and Zoning Commission held a special meeting on March 28, 2019, to consider the subcommittee's proposal. Twenty-seven (27) citizens came forward and spoke in opposition to the proposal. Please also refer to the excerpt from the Commission's meeting minutes attached to this Council Action Form.

#### **ANALYSIS AND RECOMMENDATION:**

During a special meeting on March 28, 2019, the Planning and Zoning Commission voted unanimously to recommended approval of the proposed amendments to the text of Bryan Code of Ordinances, as presented.

- There are common concerns about the quality, appearance, durability and lack of price appreciation of manufactured housing, and the perceived negative impact these factors have on neighboring property values. Such concerns are driven by the existence of dilapidated manufactured housing units that have, through normal wear and tear or lack of proper maintenance, passed the end of their service life but are still in use as dwellings.
- Continuing to allow the installation of manufactured homes on individual lots will create conditions having a long-term negative effect on the welfare of the public.
- The Mixed-Use Residential District (MU-1), the only district that allows manufactured homes on individual lots by right, was established 30 years ago as a temporary district classification.
- The primary initial impact of approval of the proposed text amendment will be on currently undeveloped (vacant) individual lots currently zoned MU-1.
- Approval of the proposed text amendments will not have an immediate effect upon owners of existing manufactured homes located within the MU-1 District. All existing manufactured homes on individual lots at the time of adoption of the proposed amendment may remain. By State law and local ordinance, the owners of these structures are allowed a one- time replacement with a newer manufactured home.
- The conversion of MU-1 to RD-5 District as proposed will immediately diminish the housing-type options on currently undeveloped or underdeveloped lots located within the current MU-1 Districts. Fewer such options may reduce the availability of affordable housing.
- If the proposed text amendment is approved, manufactured housing will still be allowed within licensed manufactured home communities and potentially by prior approval of a Conditional Use Permit on lots greater than one acre within the A-O District, Mixed Use District (MU-2), and Multiple-Family District (MF).

#### **OPTIONS:**

1. approve ordinance text amendments as recommended by the Planning and Zoning Commission;
2. approve ordinance text amendments with modifications (which may require City Council consideration at a future City Council meeting); or
3. do not approve this ordinance amendment at this time and provide direction to staff and the Planning and Zoning

Commission.

**ATTACHMENTS:**

1. draft ordinance;
2. excerpt from March 28, 2019 Planning and Zoning Commission special meeting minutes;
3. memorandum to the Planning and Zoning Commission;
4. PowerPoint presentation to the Planning and Zoning Commission; and
5. citizen comments received as of March 28, 2019.

**BRYAN CITY COUNCIL  
MINUTES OF SECOND REGULAR MEETING APRIL 9, 2019**

The Bryan City Council held a second regular meeting on Tuesday, April 9, 2019, in the Council Chambers of the Bryan Municipal Building. A notice of the meeting was posted at least 72 hours in advance in accordance with Section 551, Texas Government Code. Mayor Andrew Nelson and Councilmembers Reuben Marin, Prentiss Madison, Greg Owens, Mike Southerland, Brent Hairston and Buppy Simank were present. Also present were City Manager Kean Register, City Attorney Janis Hampton and City Secretary Mary Lynne Stratta.

**4. Public Hearings and First and Only Readings of Ordinances**

- Public hearing, presentation, and consideration of the first and only reading of an ordinance of the City of Bryan, Texas, to amend the text of the Bryan Code of Ordinances, Chapter 130 - Zoning, by eliminating all of Section 130-29 - Mixed Use Residential District (MU-1); converting the depiction of all parcels of land currently described on the Official Zoning District Map as MU-1 to Residential District - 5000 (RD-5); and removing all references to the Mixed Use - Residential District (MU-1) from other parts of the City of Bryan Code of Ordinances, specifically Chapters 38 - Environment; 62 - Land and Site Development; 98 - Signs; and 118 - Traffic and Vehicles; and providing for a 90-day period limited vesting provision for current owners of vacant property to seek approval under the previous standard

The public hearing was opened and the following citizens spoke in opposition to the ordinance: Mr. Barry Densy, 1907 Marshall Avenue; Ms. Margaret Kennedy, 7766 Grassburr Road; Ms. Deborah Ruiz, 1901-1907 Marshall Avenue; Ms. Rebecca Crenshaw, 1602 Pinfeather; Mr. Larry Gilbert, 2902 West Highway 21; Ms. Stephanie Koithan, 2101 Harvey Mitchell Parkway South, College Station, as President of Young Dems BCS; Mr. Sedrick Gilbert, 600 North Sims; Mr. Rafael Pena; 510 West 15<sup>th</sup> Street; Mr. Byrrone Watson, 910 Harlem Lane; Mr. Karl Radde, President and General Manager of Southern Comfort Homes, 2106 East Highway 21; Ms. Lakeisha Carroll, 2929 Stevens Drive; Mr. Raul Santana, 104 South Sterling; Ms. Mae Raven, 1503 Douglas Street; Mr. Dan DeLeon, 105 North Avenue; Ms. Diana Eugenio, 1590 Douglas; Ms. Carmen Ibarra, 601 Holt; Mr. Robert Hernandez, 1894 Patton Avenue; Mr. Roy Flores, 507 East 315t Street; Ms. Sybil Jones, 1333 F.M. 2223; Ms. Alice Rogers, 3511 East Highway 21; Mr. Dwight Rabe, 2703 Leonard Road; Mr. Josh Wilkinson, 2910 Chaparral Circle; and Mr. John McBride, 1148 Stanley Trail.

The following citizens spoke in support of the ordinance: Mr. Mark Smith, 2615 West 49<sup>th</sup> Street, Austin; Mr. Steve Godby, Executive Director of Rebuilding Together, 9785 Drummer Circle, College Station; Mrs. Ann Horton, 801 North Rosemary; and Ms. Tamara Garza, member of the Historic Landmark Commission and President of the Eastside Historic Neighborhood Association, 611 East 29<sup>th</sup> Street.

The public hearing closed at 7:50 p.m. with no other comments. The meeting was recessed for three minutes and reconvened in the same location at 7:53 p.m.

Mr. Jody Rodriguez, the chair of the Planning and Zoning Commission subcommittee regarding manufactured housing, explained the subcommittee's recommendation. He clarified that no one would be forced out of his or her manufactured or mobile home and no one was going to be displaced. He stated current residents of a manufactured home could stay there as long as desired, as long as the home meets City Code. He continued that once the manufactured home has reached the end of its service life, it can be replaced once with one that is five years old or newer, as long as it meets City Code. He stated it could be decades before an MU-1 lot has to transition to a stick built home rather than a manufactured home. He also stated there is an added provision, which allows the current owner of an MU-1 lot to put a manufactured home on that lot, if it will be owner occupied, after seeking approval from the City and the manufactured home is placed on the lot within one year of approval. He stated that MU-1 zoning was originally adopted as a temporary classification with the intent to reclassify it. Mr. Rodriguez pointed out the number five priority identified by stake holders in the 2016 Comprehensive Plan was to "investigate maintenance programs and encourage the replacement of dilapidated manufactured homes with site built units". He also stated the City Council, citizens and other stakeholders had input into the 2016 Comprehensive Plan. He listed the following factors the subcommittee considered in making the subcommittee's recommendation: meetings with stakeholders, affordable housing needs, neighborhood integrity, asset appreciation, and complaints from citizens, health and safety, impact on neighboring properties, concern about dilapidated homes, etc. He stated there were approximately 2,600 MU-1 parcels of land in the City, and of those about 750 have manufactured homes and 660 were vacant. He also pointed out the City had allotted funds toward an infill development program to buy lots and incentivize builders to build affordable homes. Mr. Rodriguez listed situations where manufactured homes would still be allowed such as with a conditional use permit on property zoned A-O or in mobile home parks. Commissioner Leo Gonzalez explained this recommendation was based on long-term benefits to the community and its citizens. Mr. Rodriguez explained again the 90-day limited vesting period to allow for current owners of vacant property to put a manufactured home on their property. He reiterated his previous statements that adoption of the ordinance would not require anyone to vacate their manufactured home. Mr. Rodriguez also stated in cases of disaster like tornado or fire, a manufactured house can be replaced as many times as impacted and does not count towards the one time replacement guaranteed by State law. Mr. Gonzalez also clarified that repairs to existing manufactured homes would be allowed and encouraged. Mr. Rodriguez and Mr. Gonzalez then answered questions from Council.

Motion to approve the first and only reading of Ordinance No. 2338 of the City of Bryan, Texas, to amend the text of the Bryan Code of Ordinances, Chapter 130 - Zoning, by eliminating all of Section 130-29 - Mixed Use Residential District (MU-1); converting the

depiction of all parcels of land currently described on the Official Zoning District Map as MU-1 to Residential District- 5000 (RD-5); and removing all references to the Mixed Use - Residential District (MU-1) from other parts of the City of Bryan Code of Ordinances, specifically Chapters 38 - Environment; 62 -Land and Site Development; 98 - Signs; and 118 - Traffic and Vehicles; providing for a 90-day period limited vesting provision for current owners of vacant property to seek approval under the previous standard.

Council discussion followed. Comments in opposition to the ordinance cited concerns about the lack of affordable housing in Bryan. Comments in favor indicated support of the ordinance as beneficial long-term to the city and citizens. Mayor Nelson stated affordable housing would be a top priority for the Council going forward.

Motion by Greg Owens, second by Buppy

Simank Final Resolution: Motion Carries

Voting Aye: Andrew Nelson, Buppy Simank, Greg Owens, Reuben Marin, Brent Hairston

Voting Nay: Mike Southerland, Prentiss Madison

# APPENDIX C FFEIC FINANCIAL INSTITUTIONS AND LOAN DISPOSITIONS

LIST OF FINANCIAL INSTITUTIONS WHOSE DATA MAKE UP THE 2016 MSA/MD AGGREGATE REPORT

Page 1 of 4

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

INSTITUTIONS WHO HAVE A HOME OR BRANCH OFFICE IN THE MSA/MD

21ST MORTGAGE  
ALLIANCE FINANCIAL RESOURCES,  
AMERICA'S CHOICE HOME LOANS LP  
AMERICAN INTERNET MORTGAGE, IN  
AMERICASH  
ARK-LA-TEX FINANCIAL SERVICES  
BBMC MORTGAGE, LLC  
BRENHAM NATIONAL BANK  
CAPITAL FARM CREDIT  
CARRINGTON MORTGAGE SERVICES  
CHURCHILL MORTGAGE CORPORATION  
CITIZENS BANK  
CMG MORTGAGE, INC  
COUNTRYPLACE MORTGAGE, LTD  
EVERETT FINANCIAL, INC.  
First Choice Loan Services Inc  
FIRST NATIONAL BANK OF HUNTSVI  
FRANKLIN AMERICAN MORTGAGE CO  
GATEWAY MORTGAGE GROUP  
GREAT WESTERN FINANCIAL SERVIC  
GUARANTY BANK & TRUST, NA  
HOME POINT FINANCIAL CORP  
IBERIABANK MORTGAGE COMPANY  
LAKEVIEW LOAN SERVICING, LLC  
MEMBER HOME LOAN LLC  
Mortgage Research Center  
NATIONS RELIABLE LENDING LLC  
NETWORK FUNDING LP  
PACIFIC UNION FINANCIAL, LLC  
PENNYMAC LOAN SERVICES LLC  
PLAZA HOME MORTGAGE, INC.  
PRIORITY HOME MORTGAGE, L.P.  
PROVIDENT FUNDING ASSOCIATES  
ROYAL UNITED MORTGAGE LLC  
SFMC, LP  
SPIRIT OF TEXAS BANK  
SUN WEST MORTGAGE COMPANY, INC  
THE BANK & TRUST OF BRYAN/COLL  
TOP FLITE FINANCIAL, INC.  
VANDERBILT MORTGAGE  
WELLS FARGO BANK, NA

360 MORTGAGE GROUP LLC  
AMCAP MORTGAGE LTD  
AMERICAN FINANCIAL RESOURCES  
AMERICAN MOMENTUM BANK  
AmeriHome Mortgage Company, LL  
ASPIRE FINANCIAL INC  
BRANCH BANKING AND TRUST CO  
BROKER SOLUTIONS, INC.  
CAPSTAR LENDING LLC  
CENDERA FUNDING, INC.  
CITIBANK, N.A.  
CITIZENS STATE BANK  
COMPASS BANK  
DITECH FINANCIAL  
EXTRACO BANKS, NA  
FIRST CONTINENTAL MORTGAGE, LT  
FIRST NATIONAL BANK TEXAS  
Freedom Mortgage Corporation  
GEORGETOWN MORTGAGE, LLC  
GREATER TEXAS FEDERAL CREDIT U  
GUARDIAN MORTGAGE COMPANY, INC  
HOMETRUST MORTGAGE COMPANY  
IMPAC MORTGAGE CORP.  
loanDepot.com, LLC  
MID AMERICA MORTGAGE, INC.  
MOVEMENT MORTGAGE, LLC  
NATIONSTAR MORTGAGE  
NEW PENN FINANCIAL, LLC  
PARAMOUNT EQUITY MORTGAGE, LLC  
PHH HOME LOANS  
Primary Residential Mortgage,  
PROSPECT MORTGAGE  
QUICKEN LOANS  
SECURITYNATIONAL MORTGAGE COMP  
SOUTHSTAR BANK SSB  
STEARNS LENDING  
SUNTRUST MORTGAGE, INC  
THE MONEY SOURCE  
UNITED BUILT HOMES, LLC  
VILLAGE CAPITAL & INVESTMENT  
WILLOW BEND MORTGAGE COMPANY

ACADEMY MORTGAGE CORPORATION  
AMEGY MORTGAGE COMPANY, L.L.C.  
AMERICAN HOMESTAR MORTGAGE  
AMERICAN SOUTHWEST MORTGAGE CO  
AMERISAVE MORTGAGE CORPORATION  
BANK OF AMERICA, N.A.  
BRAZOS VALLEY SCHOOLS CREDIT U  
CALIBER HOME LOANS, INC.  
CARDINAL FINANCIAL COMPANY, LI  
CERTIFIED FUNDING, L.P.  
CITIMORTGAGE, INC  
CITY BANK  
CORNERSTONE HOME LENDING, INC.  
ENVOY MORTGAGE, LTD.  
FAIRWAY INDEPENDENT MORT CORP  
FIRST GUARANTY MORTGAGE CORP  
FIRST STATE BANK OF BEDIAS  
GARDNER FINANCIAL SERVICES  
GOLD STAR MORTGAGE FIN GROUP  
GUARANTEED RATE INC  
GUILD MORTGAGE COMPANY  
HOMEWARD RESIDENTIAL INC  
JPMORGAN CHASE BANK, NA  
LUBBOCK NATIONAL BANK  
MIDSOUTH BANK, N.A.  
NATIONS LENDING CORPORATION  
NETWORK CAPITAL FUNDING CORPOR  
NTFN, INC.  
PARKSIDE LENDING LLC  
PHH MORTGAGE CORPORATION  
PRIMELENDING  
PROSPERITY BANK  
RELIANCE FIRST CAPITAL LLC  
SENTE MORTGAGE  
SOUTHWEST STAGE FUNDING LLC  
STONEGATE MORTGAGE CORPORATION  
SWBC Mortgage Corporation  
THIRD COAST BANK, SSB  
United Shore Financial Service  
WALLICK AND VOLK, INC  
Wyndham Capital Mortgage, Inc



## INSTITUTIONS WHO DO NOT HAVE A HOME OR BRANCH OFFICE IN THE MSA/MD

A+ FEDERAL CREDIT UNION	AAG	ADMIRALS BANK
ADVANCIAL FEDERAL CREDIT UNION	AFFILIATED BANK	AFFILIATED MORTGAGE COMPANY
ALLEN MORTGAGE, LLC	ALLIANT CREDIT UNION	ALLY BANK
Altra Federal Credit Union	AMARILLO NATIONAL BANK	AMERICAN AIRLINES FCU
AMERICAN BANK, NA	AMERICAN BANK, NA	AMERICAN EQUITY MORTGAGE, INC.
AMERICAN FINANCIAL NETWORK INC	AMERICAN FINANCING CORPORATION	AMERICAN FIRST NATIONAL BANK
AMERICAN HERITAGE CAPITAL LP	AMERICAN INTERBANC MORTGAGE	AMERICAN NATIONAL BANK OF TX
American Neighborhood Mortgage	AMERIPRO FUNDING	AMOCO FEDERAL CREDIT UNION
AMPLIFY CREDIT UNION	ANHEUSER-BUSCH EMPLOYEES' CU	ARVEST BANK
ASSEMBLIES OF GOD CREDIT UNION	AUSTIN BANK TEXAS NA	AUSTIN COUNTY STATE BANK
BANC OF CALIFORNIA, NA	BANCORPSOUTH BANK	BANK OF ENGLAND
BARRINGTON BANK AND TRUST	BARRONS MORTGAGE GROUP LTD	BENCHMARK BANK
BERKADIA COMMERCIAL MORTG LLC	BERKELEY POINT CAPITAL LLC	BLUELEAF LENDING, LLC
BMO HARRIS BANK N.A.	BOFI FEDERAL BANK	BOKF NA
BOPTI FEDERAL CREDIT UNION	BP FEDERAL CREDIT UNION	BRIDGEVIEW BANK GROUP
BTH BANK, NA	BUCKHOLTS STATE BANK	C.U. Mortgage Services, Inc.
CADENCE BANK, N.A.	CALCON MUTUAL MORTGAGE LLC	CAPITAL BANK, NA
CAPITAL ONE, NA	CAPITOL CREDIT UNION	CAPITOL FEDERAL SAVINGS BANK
CBC NATIONAL BANK	CENTRAL BANK	CENTRAL NATIONAL BANK
CHARLES SCHWAB BANK	CHEMCEL FEDERAL CREDIT UNION	CHEVRON FEDERAL CREDIT UNION
CHICAGO MORTGAGE SOLUTIONS	CHOU TEAM REALTY, INC	CIS Financial Services, Inc.
CITIZENS 1ST BANK	CITIZENS NATIONAL BANK	CITIZENS NATIONAL BANK
Citizens National Bank of Texa	CITIZENS STATE BANK	CITIZENS STATE BANK
CITIZENS STATE BANK	CITY NATIONAL BANK OF TAYLOR	CIVIC FINANCIAL SERVICES
CLASSIC BANK, NA	CLEARPATH LENDING	COCA-COLA FEDERAL CREDIT UNION
COLONIAL SAVINGS, F.A.	COMERICA BANK	COMMUNITY BANK & TRUST
COMMUNITY NATIONAL BANK	COMMUNITY NATIONAL BANK	COMMUNITY NATIONAL BANK
COMMUNITYBANK OF TEXAS NA	CREDIT UNION OF TEXAS	CRESCENT MORTGAGE COMPANY
Crockett National Bank	CROSSCOUNTRY MORTGAGE	DAMASCUS COMMUNITY BANK
DART BANK	DATCU CREDIT UNION	DEERE EMPLOYEES CREDIT UNION
DHI MORTGAGE COMPANY LIMITED	Digital Federal Credit Union	DUBUQUE BANK & TRUST CO.
EASTMAN CREDIT UNION	ECU MORTGAGE, LLC	EMBRACE HOME LOANS, INC.
Equity Prime Mortgage LLC	ETHOS LENDING, LLC	EUSTIS MORTGAGE CORPORATION
EVERBANK	EVOLVE BANK & TRUST	FIDELITY BANK
FINANCE OF AMERICA MORTGAGE LL	FIRST BANK	FIRST BANK
FIRST BANK & TRUST EAST TEXAS	FIRST CENTRAL CREDIT UNION	FIRST COMMUNITY CREDIT UNION
First Federal Bank of Kansas C	FIRST FINANCIAL BANK N. A.	FIRST INTERNET BANK OF INDIANA
FIRST NATIONAL BANK MORTGAGE	FIRST NATIONAL BANK OF AMERICA	First National Bank of Central
First National Bank of Gilmer	FIRST NATIONAL BANK OF OMAHA	FIRST NATIONAL BANK OF SONORA
FIRST STATE BANK	FIRST STATE BANK	FIRST STATE BANK CENTRAL TEXAS
FIRST TECHNOLOGY CREDIT UNION	FIRST UNITED BANK	FIRST UNITED BANK AND TRUST CO
FIRST WESTERN FEDERAL SAVINGS	FIRSTBANK	FLAGSHIP FINANCIAL GROUP, LLC.
FLAGSTAR BANK	FLORIDA CAPITAL BANK, NA	FORETHOUGHT LIFE INSURANCE CO
FRANKLIN FIRST FINANCIAL, LTD.	FRONTIER BANK OF TEXAS	FROST BANK
GENEQUITY MORTGAGE, INC	GEORGIA BANKING COMPANY	GMFS LLC
GMH MORTGAGE SERVICES LLC	GOLDWATER BANK N.A.	GRAND BANK OF TEXAS

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

## INSTITUTIONS WHO DO NOT HAVE A HOME OR BRANCH OFFICE IN THE MSA/MD

GREEN BANK, N.A.	GROUP MORTGAGE, LLC	GS COMMERCIAL REAL ESTATE LP
GUARANTY TRUST COMPANY	GUIDANCE RESIDENTIAL LLC	GULF COAST EDUCATORS FEDERAL C
GULF COAST FEDERAL CREDIT UNIO	Hamilton National Mortgage Com	HANCOCK MORTGAGE PARTNERS, LLC
HAPPY STATE BANK	HEB FEDERAL CREDIT UNION	Herring Bank
HIGHLANDS RESIDENTIAL MORTGAGE	HOME FINANCING UNLIMITED, INC.	HomeBridge Financial Services,
HOMETOWN BANK, N. A.	Horizon Bank, S.S.B.	HOUSTON FEDERAL CREDIT UNION
HOUSTON POLICE FEDERAL CU	HOUSTONIAN MORTGAGE GROUP INC	IBERIABANK
ICON BANK OF TEXAS	IFREEDOM DIRECT CORPORATION	INCOMMONS BANK, N.A.
INDEPENDENT BANK	INDUSTRY STATE BANK	INTEGRITY FIRST FINANCIAL GROU
INTERCAP LENDING	INTERCONTINENTAL CAPITAL GROUP	INTERLINC MORTGAGE SERVICES
INTERNATIONAL BANK OF COMMERCE	INTOUCH CREDIT UNION	J.G. WENTWORTH HOME LENDING
JAMES B. NUTTER & COMPANY	JEFFERSON BANK	JMAC LENDING, INC
JSC FEDERAL CREDIT UNION	JUSTICE FEDERAL CREDIT UNION	KELLER MORTGAGE, LLC
KLEBERG BANK, N.A.	KS STATEBANK	Landmark Bank N.A.
LEGACY MORTGAGE, LLC	LEGACYTEXAS BANK	LIVE WELL FINANCIAL, INC
LOANSTAR HOME LOANS, LLC	LONE STAR ST BK OF WEST TX	Low VA Rates, LLC
LRS FINANCIAL NETWORK DBA HNB	M&T REALTY CAPITAL CORPORATION	MANN MORTGAGE LLC
MB FINANCIAL BANK NA	MEMBERS CHOICE OF CNTRL TX FCU	MEMBERS MORTGAGE COMPANY INC
MEMBERS TRUST OF SW FCU	Michigan Mutual, Inc	MIDFIRST BANK
MIDWEST EQUITY MORTGAGE, LLC	MIT FEDERAL CREDIT UNION	MORGAN STANLEY PRIVATE BANK NA
MORIA DEVELOPMENT INC	MORTGAGE FINANCIAL SERVICE LLC	Mortgage Lenders of America, L
MORTGAGE SOLUTIONS OF COLORADO	MUTUAL OF OMAHA	NATIONAL BANK
Nations Direct Mortgage, LLC	NAVY ARMY COMMUNITY CU	NBKC BANK
NEW DAY FINANCIAL, LLC	NEW YORK COMMUNITY BANK	NEXBANK
NFCU	NIZARI PROGRESSIVE F C U	NORTH AMERICAN SAVINGS BANK
NORTH EAST TEXAS CREDIT UNION	NORTHPOINTE BANK	NORTHSTAR BANK OF TEXAS
NUDGE FUNDING, LLC	OCEANSIDE MORTGAGE COMPANY	ON Q FINANCIAL INC
ONE REVERSE MORTGAGE, LLC	ORIGIN BANK	PARAMOUNT RESIDENTIAL MORTGAGE
PEARLAND STATE BANK	PENTAGON FEDERAL CREDIT UNION	PEOPLES BANK
PERFORMANCE EQUITY PARTNERS	Pinnacle Bank	PIONEER BANK SSB
PLANET HOME LENDING, LLC	PNC BANK N.A.	POST OAK BANK, N.A.
PREMIA MORTGAGE, LLC	Presidential Bank, FSB	PRIMEWEST MORTGAGE CORP
PRIVATE BANK OF BUCKHEAD	PUBLIC EMPLOYEES CREDIT UNION	PURDUE FEDERAL CU
R BANK	R M K FINANCIAL CORP	RANDOLPH-BROOKS FCU
RANLIFE, INC.	RAYMOND JAMES BANK, NA	RED RIVER EMPLOYEES FCU
REDWOOD RES. ACQUISITION CORP	REGIONS BANK	REPUBLIC STATE MORTGAGE CO
RESIDENTIAL BANCORP	ROUND TOP STATE BANK	SABINE STATE BANK
SAN ANTONIO FEDERAL CREDIT UNI	SECURITY SERVICE FCU	SECURITY STATE BANK & TRUST
SHELL FEDERAL CREDIT UNION	SMART CHOICE MORTGAGE, LLC	SoFi Lending Corp.
SOUTH GEORGIA BANK	SOUTHSIDE BANK	SOUTHWEST BANK
SOUTHWEST FUNDING, LP	SSBT MORTGAGE GROUP LLC	STANDARD MORTGAGE CORPORATION
STATE DEPARTMENT FCU	STATE FARM BANK	STATE NATIONAL BANK IN WEST
STIFEL BANK & TRUST	SUMMIT FUNDING, INC	SUNTRUST BANKS, INC
SUTHERLAND MORTGAGE SERVICES	TDECU	TEXAS BANK AND TRUST COMPANY
TEXAS BANK FINANCIAL	TEXAS BAY CREDIT UNION	TEXAS CAPITAL BANK
TEXAS STATE BANK	TEXAS TRUST CREDIT UNION	THE BANK

## INSTITUTIONS WHO DO NOT HAVE A HOME OR BRANCH OFFICE IN THE MSA/MD

THE BANK AND TRUST, S.S.B.  
THRIVENT FEDERAL CREDIT UNION  
TOWN SQUARE MORTGAGE & INVESTM  
TRUIITY FEDERAL CREDIT UNION  
UBS Bank USA  
UNIVERSAL AMERICAN MTG. CO.LLC  
US BANK, N.A.  
VANDYK MORTGAGE CORPORATION  
WALLIS STATE BANK  
WHITNEY BANK  
WR STARKEY MORTGAGE LLP

THE FEDERAL SAVINGS BANK  
TIAA-CREF TRUST COMPANY, FSB  
TOYOTA FINANCIAL SAVINGS BANK  
TRUSTMARK NATIONAL BANK  
UNION HOME MORTGAGE  
UNIVERSITY FEDERAL CREDIT UNIO  
USAA FEDERAL SAVINGS BANK  
VICTORIAN FINANCE, LLC  
Waterstone Mortgage Corporatio  
WOLFE FINANCIAL, INC

The First National Bank of Tre  
TIB THE INDEPENDENT BANKERSBAN  
TRUHOME SOLUTIONS, L.L.C.  
UBS AG, TAMPA BRANCH  
United Security Financial  
UNIVERSITY ISLAMIC FINANCIAL  
V.I.P. MORTGAGE, INC.  
WALKER & DUNLOP, LLC  
WESTBOUND BANK  
WOODFOREST NATIONAL BANK



ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

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

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings									Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D	Loans On Manufactured Home Dwellings From Columns A, B, C & D	% Min Pop 4/	Median Income As PCT of MSA/MD Median				
	Home Purchase Loans				Refinancings	Home Improvement Loans		E							F		G	
	FHA, FSA/RHS & VA		Conventional			D		E							F		G	
	A		B		C		D		E						F		G	
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's					
TX/BRAZOS COUNTY/0001.01														33	104			
LOANS ORIGINATED	67	15017	147	31179	89	18302	20	1499		24	5110	17	1658					
APPS APPROVED, NOT ACCEPTED	1	393	5	1123	2	145	6	343		2	265							
APPS DENIED	13	1910	40	4418	54	9357	11	826		6	660	35	2688					
APPS WITHDRAWN	8	1804	20	4322	30	5703	1	85		3	697	4	504					
FILES CLOSED FOR INCOMPLETENESS	2	253	18	1213	16	2940	1	34		1	79	19	1278					
TX/BRAZOS COUNTY/0001.02														16	140			
LOANS ORIGINATED	35	6752	92	21065	73	18057	15	1410		13	2471	15	1319					
APPS APPROVED, NOT ACCEPTED	1	244	3	768	2	251												
APPS DENIED	2	363	13	2977	33	8099	9	1349				10	952					
APPS WITHDRAWN	3	522	13	2925	22	4483	4	603		1	128	1	62					
FILES CLOSED FOR INCOMPLETENESS	3	195	2	223	8	1460						4	304					
TX/BRAZOS COUNTY/0001.03														17	130			
LOANS ORIGINATED	3	529	17	4983	30	6049	2	113		3	2043	8	752					
APPS APPROVED, NOT ACCEPTED			2	277	1	112				1	225	1	52					
APPS DENIED	2	243	9	1017	12	2017	2	202				10	970					
APPS WITHDRAWN	2	354	1	406	3	614						2	243					
FILES CLOSED FOR INCOMPLETENESS			6	394	2	481						6	394					
TX/BRAZOS COUNTY/0002.01														49	89			
LOANS ORIGINATED	19	3128	64	16134	25	3187	5	767		45	7370							
APPS APPROVED, NOT ACCEPTED	1	81	2	229	1	116				2	229							
APPS DENIED	6	702	5	2251	11	1251	5	265		3	365	1	54					
APPS WITHDRAWN	1	163	9	1319	9	1137	2	280		11	1466							
FILES CLOSED FOR INCOMPLETENESS					3	532	2	55										
TX/BRAZOS COUNTY/0002.02														52	98			
LOANS ORIGINATED	53	10470	90	17058	33	7037	6	215		35	7149	17	1314					
APPS APPROVED, NOT ACCEPTED	4	607	2	565	1	151	2	138		1	417	1	78					
APPS DENIED	6	901	22	2105	18	2456	5	386		3	652	22	1663					
APPS WITHDRAWN	7	1252	14	3073	14	2116	1	80		3	767	1	143					
FILES CLOSED FOR INCOMPLETENESS	2	186	6	883	5	582						7	619					

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

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

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings														% Min Pop 4/	Median Income As PCT of MSA/MD Median
	Home Purchase Loans								Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D		Loans On Manufactured Home Dwellings From Columns A, B, C & D				
	FHA, FSA/RHS & VA		Conventional		Refinancings		Home Improvement Loans									
	A	B	C	D	E	F	G									
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's			
TX/BRAZOS COUNTY/0003.00															69	74
LOANS ORIGINATED	16	2053	29	2627	20	1638	5	108			8	587	9	520		
APPS APPROVED, NOT ACCEPTED	2	272	5	455	3	319	1	12			2	217	2	96		
APPS DENIED	9	1334	17	1295	21	1785	9	250			5	308	17	1086		
APPS WITHDRAWN	8	892	4	362	8	863					1	54	2	224		
FILES CLOSED FOR INCOMPLETENESS	1	110	2	95	6	638	1	112					2	95		
TX/BRAZOS COUNTY/0004.00															69	77
LOANS ORIGINATED	19	2388	22	2072	14	1177	3	56			11	1016	1	55		
APPS APPROVED, NOT ACCEPTED	1	133	1	75							1	75				
APPS DENIED	4	556	14	1092	16	1537	1	20					14	1055		
APPS WITHDRAWN	2	294	2	230	9	834	1	91			2	153				
FILES CLOSED FOR INCOMPLETENESS	3	357	10	556	4	333					1	98	11	594		
TX/BRAZOS COUNTY/0005.00															95	39
LOANS ORIGINATED	5	519	13	2277	7	621	2	20			5	1461	5	201		
APPS APPROVED, NOT ACCEPTED	1	154														
APPS DENIED	2	373	8	491	8	1042	4	46			1	20	7	360		
APPS WITHDRAWN	1	135	2	162	1	57					1	135				
FILES CLOSED FOR INCOMPLETENESS			2	97	2	149					1	44	2	97		
TX/BRAZOS COUNTY/0006.03															90	64
LOANS ORIGINATED	3	326	15	1599	6	474	3	38	1	1148	12	889	2	79		
APPS APPROVED, NOT ACCEPTED			2	244	2	295							1	110		
APPS DENIED	1	68	28	1792	9	824	6	71			5	332	25	1621		
APPS WITHDRAWN	1	213	1	210	5	539					1	210				
FILES CLOSED FOR INCOMPLETENESS			5	300	3	297					1	56	5	300		
TX/BRAZOS COUNTY/0006.04															89	52
LOANS ORIGINATED	6	830	15	1620	7	588	1	35	1	11250	5	552	3	143		
APPS APPROVED, NOT ACCEPTED																
APPS DENIED	1	141	7	453	8	756	3	63			1	64	5	304		
APPS WITHDRAWN	3	426	1	112	3	230							1	144		
FILES CLOSED FOR INCOMPLETENESS			2	50	1	120							2	50		







ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

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CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings										% Min Pop 4/	Median Income As PCT of MSA/MD Median				
	Home Purchase Loans				Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C and D			Loans On Manufactured Home Dwellings From Columns A, B, C & D			
	FHA, FSA/RHS & VA		Conventional			D		E		F			G			
	A	B	C	D	E	F	G	Number	\$000's	Number			\$000's			
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's			
TX/BRAZOS COUNTY/0016.04														35	65	
LOANS ORIGINATED			30	4261	8	1197	1	50			28	3587				
APPS APPROVED, NOT ACCEPTED			4	568							3	438				
APPS DENIED			1	110	5	875					4	462				
APPS WITHDRAWN	1	118	5	784	6	1237					5	714				
FILES CLOSED FOR INCOMPLETENESS					2	246					2	246				
TX/BRAZOS COUNTY/0016.05															46	68
LOANS ORIGINATED	1	105	49	9729	6	719	2	93			51	9883				
APPS APPROVED, NOT ACCEPTED					1	98					1	98				
APPS DENIED			3	457	2	186	1	3			4	523				
APPS WITHDRAWN			4	523	6	692					6	670				
FILES CLOSED FOR INCOMPLETENESS			1	176	2	194					2	269				
TX/BRAZOS COUNTY/0016.06															38	87
LOANS ORIGINATED	1	247	12	4030	6	890	1	129			15	4469				
APPS APPROVED, NOT ACCEPTED			2	285							1	101				
APPS DENIED					2	213	1	3								
APPS WITHDRAWN			3	462	1	163					3	462				
FILES CLOSED FOR INCOMPLETENESS																
TX/BRAZOS COUNTY/0017.01															33	60
LOANS ORIGINATED			27	3757	12	1559					33	4549				
APPS APPROVED, NOT ACCEPTED			2	188	1	195										
APPS DENIED			4	773	5	533	1	3			6	769				
APPS WITHDRAWN			3	297	2	488					4	699				
FILES CLOSED FOR INCOMPLETENESS					1	184					1	184				
TX/BRAZOS COUNTY/0017.02															46	37
LOANS ORIGINATED			16	2017	8	954					19	2326				
APPS APPROVED, NOT ACCEPTED																
APPS DENIED			4	355	4	503	1	4			2	240	2	115		
APPS WITHDRAWN	1	187	2	327												
FILES CLOSED FOR INCOMPLETENESS			1	130												

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CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings												% Min Pop 4/	Median Income As PCT of MSA/MD Median
	Home Purchase Loans								Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D	Loans On Manufactured Home Dwellings From Columns A, B, C & D			
	FHA, FSA/RHS & VA		Conventional		Refinancings		Home Improvement Loans							
	A		B		C		D		E		F			
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	
TX/BRAZOS COUNTY/0018.01													28	106
LOANS ORIGINATED	22	3552	65	10014	34	4316	5	999	1	6000	53	7098		
APPS APPROVED, NOT ACCEPTED	1	224	3	706			1	4			1	175		
APPS DENIED	1	150	20	1158	14	1778					3	405	17	760
APPS WITHDRAWN	4	715	7	1033	7	988					4	473		
FILES CLOSED FOR INCOMPLETENESS			1	137	5	790					2	242		
TX/BRAZOS COUNTY/0018.03													33	136
LOANS ORIGINATED	5	832	55	10086	17	2666	6	634	1	3055	27	4057		
APPS APPROVED, NOT ACCEPTED			3	500	2	574	1	50						
APPS DENIED			3	262	14	2599	4	438			4	504	1	42
APPS WITHDRAWN			8	1402	6	1293								
FILES CLOSED FOR INCOMPLETENESS					5	907	2	195			1	156		
TX/BRAZOS COUNTY/0018.04													26	106
LOANS ORIGINATED	4	857	25	4020	7	966	1	45			19	2870		
APPS APPROVED, NOT ACCEPTED			2	294							2	294		
APPS DENIED			2	368	4	624					4	649		
APPS WITHDRAWN			2	273	3	408					4	513		
FILES CLOSED FOR INCOMPLETENESS														
TX/BRAZOS COUNTY/0019.00													22	140
LOANS ORIGINATED	31	5564	75	10153	46	6391	18	884			20	2004		
APPS APPROVED, NOT ACCEPTED	1	154	6	994	1	184					3	402		
APPS DENIED	1	98	3	450	19	2598	8	274			1	104		
APPS WITHDRAWN	10	1741	15	2332	15	1682			1	273	6	441		
FILES CLOSED FOR INCOMPLETENESS					8	965								
TX/BRAZOS COUNTY/0020.01													16	190
LOANS ORIGINATED	25	6009	99	21521	53	9431	10	681			19	2990		
APPS APPROVED, NOT ACCEPTED			3	888	2	1236	2	134			1	156		
APPS DENIED	4	1040	1	263	24	4987	2	65			2	270		
APPS WITHDRAWN	2	500	9	2029	10	1754	1	180			1	187		
FILES CLOSED FOR INCOMPLETENESS	1	260	3	505	8	1402					1	156		

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

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CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings														% Min Pop 4/	Median Income As PCT of MSA/MD Median
	Home Purchase Loans								Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D	Loans On Manufactured Home Dwellings From Columns A, B, C & D					
	FHA, FSA/RHS & VA		Conventional		Refinancings		Home Improvement Loans									
	A		B		C		D		E		F		G			
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's			
TX/BRAZOS COUNTY/0020.02															23	141
LOANS ORIGINATED	33	6292	93	16874	57	12562	15	1574	1	3650	30	4148	1	15		
APPS APPROVED, NOT ACCEPTED			3	600	4	405	5	257			1	75				
APPS DENIED	5	690	11	1421	26	6635	3	131			6	914	6	505		
APPS WITHDRAWN	2	426	16	2630	15	3257	1	50			4	545				
FILES CLOSED FOR INCOMPLETENESS	1	56	5	394	5	951	1	59			3	358	5	268		
TX/BRAZOS COUNTY/0020.06															30	152
LOANS ORIGINATED	7	1384	23	3468	13	1765					16	2143				
APPS APPROVED, NOT ACCEPTED	1	164	2	370			1	6								
APPS DENIED	1	137			12	1474	1	106			1	125				
APPS WITHDRAWN			5	999	2	418					3	443				
FILES CLOSED FOR INCOMPLETENESS																
TX/BRAZOS COUNTY/0020.07															26	142
LOANS ORIGINATED	41	8217	152	27579	73	11439	7	501			83	14442				
APPS APPROVED, NOT ACCEPTED	1	201	7	1181	2	390					3	530				
APPS DENIED	5	952	1	122	32	4745	1	15			4	438				
APPS WITHDRAWN	5	1051	19	4215	22	3820	2	400			13	1876				
FILES CLOSED FOR INCOMPLETENESS			1	130	4	614	1	40			2	264				
TX/BRAZOS COUNTY/0020.08															25	166
LOANS ORIGINATED	70	16936	302	70980	120	23444	12	887			62	10288				
APPS APPROVED, NOT ACCEPTED	1	267	12	3086	6	1141					3	652				
APPS DENIED	3	811	16	3440	36	5797	6	299			6	768				
APPS WITHDRAWN	11	2359	33	7339	26	4999	3	112			8	1392				
FILES CLOSED FOR INCOMPLETENESS	2	393	4	928	9	1587										
TX/BRAZOS COUNTY/0020.09															19	250
LOANS ORIGINATED	12	4674	92	29900	59	16947	8	1363			6	1828				
APPS APPROVED, NOT ACCEPTED	1	626	6	1778	5	1442										
APPS DENIED	4	1273	5	1611	19	4378	5	344								
APPS WITHDRAWN	2	558	8	1960	23	7402	1	143								
FILES CLOSED FOR INCOMPLETENESS					6	2111	1	13								



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CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings										% Min Pop 4/	Median Income As PCT of MSA/MD Median				
	Home Purchase Loans				Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D				Loans On Manufactured Home Dwellings From Columns A, B, C & D			
	FHA, FSA/RHS & VA		Conventional													
	A		B		C		D		E				F		G	
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's			
TX/BRAZOS COUNTY/0020.15														33	0	
LOANS ORIGINATED																
APPS APPROVED, NOT ACCEPTED																
APPS DENIED																
APPS WITHDRAWN			1	58	1	180										
FILES CLOSED FOR INCOMPLETENESS																
TX/BURLESON COUNTY/SMALL														32	102	
LOANS ORIGINATED	47	6450	139	17295	63	12626	46	2145		42	5074	57	4299			
APPS APPROVED, NOT ACCEPTED	3	386	20	1520	6	678	1	10		4	374	15	1246			
APPS DENIED	14	1600	71	5674	58	8541	27	1522		7	571	67	4664			
APPS WITHDRAWN	20	2661	20	2164	25	3170	9	1434		5	535	20	1876			
FILES CLOSED FOR INCOMPLETENESS	6	778	45	2887	9	1113	2	245		4	146	48	3489			
TX/ROBERTSON COUNTY/SMALL														41	81	
LOANS ORIGINATED	32	4652	93	16120	53	9053	23	1260		35	5900	25	2164			
APPS APPROVED, NOT ACCEPTED	2	194	11	1101	7	1149	3	148		2	351	6	279			
APPS DENIED	15	1435	67	6371	50	5946	22	520		11	1071	52	4390			
APPS WITHDRAWN	7	1234	18	3025	31	4478	4	464		5	731	4	368			
FILES CLOSED FOR INCOMPLETENESS	4	652	28	1874	12	1345				2	139	28	2037			
MSA/MD(TOTAL)														0	0	
LOANS ORIGINATED	689	135453	2616	545420	1262	248965	277	22767	28	109477	1178	223183	187	13961		
APPS APPROVED, NOT ACCEPTED	24	4730	148	26113	73	15855	28	1376		47	7029	29	2085			
APPS DENIED	112	17392	496	58429	654	108692	159	7916	3	77892	140	20017	353	24151		
APPS WITHDRAWN	120	21092	344	68795	376	66540	44	5882	6	24109	152	24915	36	3609		
FILES CLOSED FOR INCOMPLETENESS	28	3540	178	13416	155	25889	11	753		31	2966	172	11201			
INVALID GEOGRAPHIC IDENTIFIERS 2/														0	0	
LOANS ORIGINATED																
APPS APPROVED, NOT ACCEPTED																
APPS DENIED																
APPS WITHDRAWN																
FILES CLOSED FOR INCOMPLETENESS																

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BORROWER OR CENSUS TRACT CHARACTERISTICS	FANNIE MAE		GINNIE MAE		FREDDIE MAC		FARMER MAC		PRIVATE SECURITIZATION		COMMERCIAL BANK, SAVINGS BANK, OR SAVING ASSOC		INSURANCE CO, CREDIT UNION, MORTGAGE BK, OR FINANCE CO		AFFILIATE INSTITUTION		OTHER PURCHASER	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
	<b>BORROWER CHARACTERISTICS</b>																	
<b>RACE 5/</b>																		
AMERICAN INDIAN/ALASKA NATIVE	6	904	2	300	2	348					2	328	1	191			1	177
ASIAN	56	12766	5	933	38	6935					19	3816	33	6562	16	3342	2	585
BLACK OR AFRICAN AMERICAN	16	3014	41	6574	4	597			2	466	4	550	17	2649	1	405	11	2246
NATIVE HAWAIIAN/OTHER PACIFIC ISLND			1	180	1	175							2	378	1	100		
WHITE	1005	196142	443	88181	572	111064			12	2232	435	95766	520	105869	18	3347	138	26780
2 OR MORE MINORITY RACES													1	132				
JOINT (WHITE/MINORITY RACE)	9	1598	15	2828	5	940					3	533	15	3913			1	196
RACE NOT AVAILABLE 6/	329	124236	422	79684	302	64016			2	675	64	15285	57	11850	10	8834	33	6294
<b>ETHNICITY 7/</b>																		
HISPANIC OR LATINO	72	11887	72	11936	40	6221					42	8101	68	11990	1	100	19	3620
NOT HISPANIC OR LATINO	1004	199170	418	83669	563	110116			13	2501	404	89507	489	101369	34	6950	132	25953
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	26	4928	35	6466	23	4164			1	197	14	2870	27	5323			3	545
ETHNICITY NOT AVAILABLE 6/	319	122675	404	76609	298	63574			2	675	67	15800	62	12862	11	8978	32	6160
<b>MINORITY STATUS 8/</b>																		
WHITE NON-HISPANIC	910	179497	349	71665	513	100962			11	2035	378	84576	425	88285	17	3203	117	22830
OTHERS, INCLUDING HISPANIC	181	34517	167	28619	112	19192			3	663	82	15902	159	30310	18	3847	36	7173
<b>INCOME 9/</b>																		
LESS THAN 50% OF MSA/MD MEDIAN	15	1176	15	1563	13	1170					6	1228	8	768				
50-79% OF MSA/MD MEDIAN	100	12445	69	9229	65	8540			2	466	49	6397	71	9728	5	823	11	1413
80-99% OF MSA/MD MEDIAN	84	12556	55	8778	83	12558			3	461	49	8299	60	9183	1	112	29	4522
100-119% OF MSA/MD MEDIAN	128	21060	58	11111	55	9506			4	543	55	9959	44	8269	2	421	35	7109
120% OR MORE OF MSA/MD MEDIAN	1011	215543	243	57291	540	113344			6	1388	360	88516	443	100006	36	7379	104	22049
INCOME NOT AVAILABLE 6/	83	75880	489	90708	168	38957			1	515	8	1879	20	3590	2	7293	7	1185
<b>CENSUS TRACT CHARACTERISTICS 10/</b>																		
<b>RACIAL/ETHNIC COMPOSITION 11/</b>																		
<b>LESS THAN 10% MINORITY</b>																		
10-19% MINORITY	325	77960	172	41125	230	55662			6	1329	143	41788	165	43264	8	1829	37	7946
20-49% MINORITY	1002	235639	622	117370	629	119413			7	1188	354	69551	431	80961	38	14199	91	17669
50-79% MINORITY	79	11941	116	17870	56	8007			3	856	20	3861	45	6613			58	10663
80-100% MINORITY	15	13120	19	2315	9	993					10	1078	5	706				
<b>INCOME 12/ 13/</b>																		
LOW INCOME	60	24367	16	3074	42	5894			1	92	18	2902	19	3038	2	274	5	780
MODERATE INCOME	90	25008	66	7801	66	9226					26	3542	47	6542	2	312	4	470
MIDDLE INCOME	481	114637	401	70410	284	49922			7	1482	178	34741	206	36877	12	8881	98	18093
UPPER INCOME	790	174648	446	97395	532	119033			8	1799	305	75093	374	85087	30	6561	79	16935
TOTAL 14/	1421	338660	929	178680	924	184075			16	3373	527	116278	646	131544	46	16028	186	36278

AGGREGATE TABLE 4-1: DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2016

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RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	3	279	1	180			2	99				
MALE												
FEMALE	2	99					2	99				
JOINT (MALE/FEMALE)	1	180	1	180								
ASIAN (TOTAL)	8	1428	6	1116			2	312				
MALE	3	633	3	633								
FEMALE	3	400	2	272			1	128				
JOINT (MALE/FEMALE)	2	395	1	211			1	184				
BLACK OR AFRICAN AMERICAN (TOTAL)	49	8051	31	5367	3	437	8	1229	5	777	2	241
MALE	21	2953	13	1929	2	203	3	376	2	357	1	88
FEMALE	8	1352	4	732	1	234	2	233			1	153
JOINT (MALE/FEMALE)	20	3746	14	2706			3	620	3	420		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	782	148637	569	112898	14	2740	83	13152	95	16984	21	2863
MALE	260	46664	175	33101	6	1069	38	6160	34	5566	7	768
FEMALE	132	20024	92	14523	3	369	12	1538	20	2931	5	663
JOINT (MALE/FEMALE)	387	81406	299	64731	5	1302	33	5454	41	8487	9	1432
2 OR MORE MINORITY RACES (TOTAL)	1	132	1	132								
MALE												
FEMALE												
JOINT (MALE/FEMALE)	1	132	1	132								
JOINT (WHITE/MINORITY RACE) (TOTAL)	25	4643	19	3818	1	154	1	61	3	471	1	139
MALE												
FEMALE												
JOINT (MALE/FEMALE)	25	4643	19	3818	1	154	1	61	3	471	1	139
RACE NOT AVAILABLE (TOTAL) 6/	105	19037	62	11942	6	1399	16	2539	17	2860	4	297
MALE	18	3235	9	1516	3	1045			4	595	2	79
FEMALE	15	1974	6	883	1	78	5	564	2	385	1	64
JOINT (MALE/FEMALE)	21	4320	16	3304	1	226	2	465	2	325		

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ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	157	25379	112	19681	3	377	22	2687	14	2225	6	409
MALE	70	11350	47	8282	2	299	11	1458	7	1130	3	181
FEMALE	36	5135	21	3276	1	78	6	750	6	911	2	120
JOINT (MALE/FEMALE)	50	8673	43	7902			5	479	1	184	1	108
NOT HISPANIC OR LATINO (TOTAL)	673	130521	485	98477	17	3658	74	12012	79	13992	18	2382
MALE	222	40317	149	28093	7	1599	30	5078	29	4793	7	754
FEMALE	113	17019	77	12173	4	603	15	1722	13	1956	4	565
JOINT (MALE/FEMALE)	335	72563	256	57589	6	1456	29	5212	37	7243	7	1063
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	52	9311	38	6735			4	628	8	1548	2	400
MALE												
FEMALE												
JOINT (MALE/FEMALE)	52	9311	38	6735			4	628	8	1548	2	400
ETHNICITY NOT AVAILABLE (TOTAL) 6/	91	16996	54	10560	4	695	12	2065	19	3327	2	349
MALE	10	1818	4	804	2	419			4	595		
FEMALE	11	1695	6	961			1	90	3	449	1	195
JOINT (MALE/FEMALE)	20	4275	14	2856	1	226	2	465	3	728		
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	590	115725	430	87949	12	2441	62	10459	72	12915	14	1961
MALE	194	35615	131	25082	4	770	27	4702	27	4436	5	625
FEMALE	100	15168	71	11169	3	369	10	1262	13	1956	3	412
JOINT (MALE/FEMALE)	294	64620	226	51376	5	1302	25	4495	32	6523	6	924
OTHERS, INCLUDING HISPANIC (TOTAL)	286	47938	201	36063	7	968	38	4868	29	4850	11	1189
MALE	94	14936	63	10844	4	502	14	1834	9	1487	4	269
FEMALE	49	6986	27	4280	2	312	11	1210	6	911	3	273
JOINT (MALE/FEMALE)	142	25795	110	20718	1	154	13	1824	14	2452	4	647
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	41	4160	14	1414	2	148	16	1791	5	577	4	230
50-79% OF MSA/MD MEDIAN	186	24315	123	16875	4	412	28	3518	27	3199	4	311
80-99% OF MSA/MD MEDIAN	160	25060	111	18039	5	897	22	2973	18	2704	4	447
100-119% OF MSA/MD MEDIAN	129	24383	100	19156	4	717	9	1650	12	2271	4	589
120% OR MORE OF MSA/MD MEDIAN	452	103567	338	79509	9	2556	35	7198	58	12341	12	1963
INCOME NOT AVAILABLE 6/	5	722	3	460			2	262				
TOTAL 14/	973	182207	689	135453	24	4730	112	17392	120	21092	28	3540



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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	17	1833	9	1199	1	128	4	285	2	198	1	23
MALE	8	1082	6	818	1	128	1	136				
FEMALE	5	476	2	327			3	149				
JOINT (MALE/FEMALE)	4	275	1	54					2	198	1	23
ASIAN (TOTAL)	191	35897	141	27733	9	1659	12	1755	23	3946	6	804
MALE	80	14736	62	12036	4	844	2	223	8	1156	4	477
FEMALE	34	5071	25	4040	3	382			5	610	1	39
JOINT (MALE/FEMALE)	77	16090	54	11657	2	433	10	1532	10	2180	1	288
BLACK OR AFRICAN AMERICAN (TOTAL)	141	14188	33	5543	6	858	69	4727	7	1083	26	1977
MALE	41	3680	13	1558	3	478	18	1069	1	209	6	366
FEMALE	53	4177	11	1481	2	186	26	1673	4	393	10	444
JOINT (MALE/FEMALE)	43	6007	9	2504	1	194	23	1847	2	481	8	981
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	2	240	2	240								
MALE	1	100	1	100								
FEMALE												
JOINT (MALE/FEMALE)	1	140	1	140								
WHITE (TOTAL)	2705	500309	1932	387062	109	18567	297	36145	251	50198	116	8337
MALE	714	129442	511	98899	26	4393	71	9631	69	13698	37	2821
FEMALE	491	70591	311	51679	24	2561	87	8378	39	6113	30	1860
JOINT (MALE/FEMALE)	1490	297879	1105	234553	58	11562	137	17984	142	30175	48	3605
2 OR MORE MINORITY RACES (TOTAL)	2	122					1	49			1	73
MALE	1	49					1	49				
FEMALE												
JOINT (MALE/FEMALE)	1	73									1	73
JOINT (WHITE/MINORITY RACE) (TOTAL)	38	7869	23	5989	1	388	7	537	4	711	3	244
MALE												
FEMALE	1	265	1	265								
JOINT (MALE/FEMALE)	37	7604	22	5724	1	388	7	537	4	711	3	244
RACE NOT AVAILABLE (TOTAL) 6/	686	151715	476	117654	22	4513	106	14931	57	12659	25	1958
MALE	69	8098	34	5178	1	125	22	1596	4	600	8	599
FEMALE	49	5036	16	2262	1	176	21	1365	5	869	6	364
JOINT (MALE/FEMALE)	94	15765	58	10978	4	945	15	1170	11	2222	6	450

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	361	41445	181	26087	8	1211	117	9429	18	2578	37	2140
MALE	125	14574	67	9397	4	654	35	2823	6	800	13	900
FEMALE	100	8208	40	4047	1	148	39	2521	4	777	16	715
JOINT (MALE/FEMALE)	133	18490	74	12643	3	409	40	3912	8	1001	8	525
NOT HISPANIC OR LATINO (TOTAL)	2625	499602	1888	386563	109	19115	271	33856	261	52601	96	7467
MALE	730	135261	529	104583	30	5284	66	8668	74	14488	31	2238
FEMALE	485	71624	307	52879	27	2913	81	7892	43	6288	27	1652
JOINT (MALE/FEMALE)	1401	291948	1049	228761	51	10867	122	17202	143	31727	36	3391
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	100	16998	67	13998	5	628	12	844	7	838	9	690
MALE												
FEMALE	7	947	2	449			3	229	2	269		
JOINT (MALE/FEMALE)	92	15366	64	12864	5	628	9	615	5	569	9	690
ETHNICITY NOT AVAILABLE (TOTAL) 6/	696	154128	480	118772	26	5159	96	14300	58	12778	36	3119
MALE	59	7352	31	4609	1	30	14	1213	2	375	11	1125
FEMALE	41	4837	17	2679	2	244	14	923	4	651	4	340
JOINT (MALE/FEMALE)	121	18029	63	11342	7	1618	21	1341	15	2670	15	1058
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	2269	440821	1684	345517	92	15987	202	27973	224	46506	67	4838
MALE	610	115951	451	90273	22	3739	51	7512	63	12898	23	1529
FEMALE	403	62330	270	47095	22	2345	60	6580	33	5067	18	1243
JOINT (MALE/FEMALE)	1253	262359	962	208074	47	9852	90	13826	128	28541	26	2066
OTHERS, INCLUDING HISPANIC (TOTAL)	839	117152	450	79846	30	4872	221	17579	60	9168	78	5687
MALE	250	33626	145	23390	12	2104	56	4253	15	2165	22	1714
FEMALE	199	19105	81	10609	6	716	71	4572	15	2049	26	1159
JOINT (MALE/FEMALE)	382	63239	223	45162	12	2052	89	8443	30	4954	28	2628
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	208	13006	55	3937	9	475	102	6634	7	551	35	1409
50-79% OF MSA/MD MEDIAN	408	39636	204	23357	21	2079	108	8205	32	3541	43	2454
80-99% OF MSA/MD MEDIAN	308	38223	184	25085	10	1089	56	5568	34	4672	24	1809
100-119% OF MSA/MD MEDIAN	280	38863	164	26838	15	1456	60	5557	19	3030	22	1982
120% OR MORE OF MSA/MD MEDIAN	2300	500541	1770	394629	89	19888	149	26743	238	53519	54	5762
INCOME NOT AVAILABLE 6/	278	81904	239	71574	4	1126	21	5722	14	3482		
TOTAL 14/	3782	712173	2616	545420	148	26113	496	58429	344	68795	178	13416

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	8	1025	3	395			2	281	2	294	1	55
MALE	5	770	2	295			1	181	2	294		
FEMALE	2	155					1	100			1	55
JOINT (MALE/FEMALE)	1	100	1	100								
ASIAN (TOTAL)	64	13849	35	7838	2	390	13	2622	8	1474	6	1525
MALE	31	7527	14	3640	2	390	5	1034	6	1162	4	1301
FEMALE	6	1028	5	870					1	158		
JOINT (MALE/FEMALE)	27	5294	16	3328			8	1588	1	154	2	224
BLACK OR AFRICAN AMERICAN (TOTAL)	145	18445	51	7322	3	505	60	6712	20	2893	11	1013
MALE	55	7554	23	3508	2	260	20	2533	6	836	4	417
FEMALE	34	3469	10	873	1	245	17	1833	4	411	2	107
JOINT (MALE/FEMALE)	55	7291	18	2941			22	2215	10	1646	5	489
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	4	1004	2	418	1	92			1	494		
MALE	2	272	1	180	1	92						
FEMALE	1	238	1	238								
JOINT (MALE/FEMALE)	1	494							1	494		
WHITE (TOTAL)	1867	354583	954	191188	58	13207	463	80268	278	49855	114	20065
MALE	631	117402	295	58336	25	5503	175	29779	94	16388	42	7396
FEMALE	273	39539	127	18615	5	915	80	11149	45	6048	16	2812
JOINT (MALE/FEMALE)	960	197309	532	114237	28	6789	206	39172	138	27254	56	9857
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	29	5442	16	3049			4	531	8	1686	1	176
MALE	3	277							3	277		
FEMALE												
JOINT (MALE/FEMALE)	26	5165	16	3049			4	531	5	1409	1	176
RACE NOT AVAILABLE (TOTAL) 6/	403	71593	201	38755	9	1661	112	18278	59	9844	22	3055
MALE	63	9583	17	2607	3	392	26	4287	11	1613	6	684
FEMALE	25	4160	8	2091	1	62	10	1180	6	827		
JOINT (MALE/FEMALE)	64	11991	34	6546	1	189	19	3603	8	1383	2	270

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	216	27614	80	11896	11	1428	82	9268	32	3846	11	1176
MALE	98	13213	35	6328	6	880	36	3555	17	1967	4	483
FEMALE	34	4143	14	1750	3	286	12	1625	4	395	1	87
JOINT (MALE/FEMALE)	84	10258	31	3818	2	262	34	4088	11	1484	6	606
NOT HISPANIC OR LATINO (TOTAL)	1874	359159	954	192107	54	12792	462	80727	285	52447	119	21086
MALE	650	123447	304	60284	24	5329	176	31574	98	17386	48	8874
FEMALE	288	40495	129	18460	4	936	91	12015	47	6356	17	2728
JOINT (MALE/FEMALE)	933	194804	519	113081	26	6527	194	37007	140	28705	54	9484
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	67	12651	35	6658			20	3963	8	1374	4	656
MALE												
FEMALE	1	117							1	117		
JOINT (MALE/FEMALE)	66	12534	35	6658			20	3963	7	1257	4	656
ETHNICITY NOT AVAILABLE (TOTAL) 6/	363	66517	193	38304	8	1635	90	14734	51	8873	21	2971
MALE	42	6725	13	1954	3	428	15	2685	7	1217	4	441
FEMALE	18	3834	8	2477			5	622	4	576	1	159
JOINT (MALE/FEMALE)	51	10048	32	6644	1	189	11	2051	5	894	2	270
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	1611	316841	846	172605	49	11897	374	68874	242	45148	100	18317
MALE	550	106065	262	52127	20	4679	147	27220	81	14883	40	7156
FEMALE	239	35087	114	16669	3	691	68	9625	40	5536	14	2566
JOINT (MALE/FEMALE)	822	175689	470	103809	26	6527	159	32029	121	24729	46	8595
OTHERS, INCLUDING HISPANIC (TOTAL)	522	78174	215	36320	16	2323	180	23197	77	11733	34	4601
MALE	191	29181	74	13769	10	1530	62	7303	33	4378	12	2201
FEMALE	78	9150	30	3731	4	531	30	3558	10	1081	4	249
JOINT (MALE/FEMALE)	252	39712	111	18820	2	262	87	12205	34	6274	18	2151
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	118	15629	30	2845	1	111	67	9327	18	2971	2	375
50-79% OF MSA/MD MEDIAN	222	24511	85	9181	4	578	91	10547	34	3553	8	652
80-99% OF MSA/MD MEDIAN	174	22383	73	10237	8	1026	62	7398	21	2424	10	1298
100-119% OF MSA/MD MEDIAN	226	32096	98	15119	6	746	78	10425	35	4658	9	1148
120% OR MORE OF MSA/MD MEDIAN	1362	298599	755	169840	39	11029	299	62574	205	41767	64	13389
INCOME NOT AVAILABLE 6/	418	72723	221	41743	15	2365	57	8421	63	11167	62	9027
TOTAL 14/	2520	465941	1262	248965	73	15855	654	108692	376	66540	155	25889

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	8	428	2	56			5	349			1	23
MALE	3	192	2	56			1	136				
FEMALE	4	213					4	213				
JOINT (MALE/FEMALE)	1	23									1	23
ASIAN (TOTAL)	3	115					1	47			2	68
MALE	2	76					1	47			1	29
FEMALE	1	39									1	39
JOINT (MALE/FEMALE)												
BLACK OR AFRICAN AMERICAN (TOTAL)	116	7384	18	967	2	100	66	4376	3	173	27	1768
MALE	34	1747	8	347	2	100	17	846			7	454
FEMALE	39	2441	2	105			25	1701	1	38	11	597
JOINT (MALE/FEMALE)	39	2872	8	515			22	1691	2	135	7	531
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	499	36780	131	10506	20	1262	207	14817	30	3075	111	7120
MALE	141	10404	44	3690	7	493	43	3038	12	1222	35	1961
FEMALE	137	9099	27	1883	5	306	68	4443	6	470	31	1997
JOINT (MALE/FEMALE)	217	17050	60	4933	7	412	93	7160	12	1383	45	3162
2 OR MORE MINORITY RACES (TOTAL)	2	122					1	49			1	73
MALE	1	49					1	49				
FEMALE												
JOINT (MALE/FEMALE)	1	73									1	73
JOINT (WHITE/MINORITY RACE) (TOTAL)	12	913	3	248			5	282			4	383
MALE												
FEMALE												
JOINT (MALE/FEMALE)	12	913	3	248			5	282			4	383
RACE NOT AVAILABLE (TOTAL) 6/	137	9265	33	2184	7	723	68	4231	3	361	26	1766
MALE	44	2827	13	917			20	1214	2	228	9	468
FEMALE	37	2328	5	303	1	78	24	1519			7	428
JOINT (MALE/FEMALE)	25	1926	7	479	2	311	10	686			6	450

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
HISPANIC OR LATINO (TOTAL)	189	11695	44	2760	2	188	100	6372	3	305	40	2070
MALE	66	4174	18	1143	1	110	31	2032	2	179	14	710
FEMALE	72	4061	13	807	1	78	39	2215	1	126	18	835
JOINT (MALE/FEMALE)	48	3287	13	810			27	1952			8	525
NOT HISPANIC OR LATINO (TOTAL)	427	32260	107	9110	16	936	183	13173	27	2808	94	6233
MALE	126	9094	38	3214	7	453	41	2688	10	1043	30	1696
FEMALE	119	8102	18	1331	4	238	66	4564	4	278	27	1691
JOINT (MALE/FEMALE)	176	14709	51	4565	4	194	73	5803	13	1487	35	2660
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	23	1753	2	233	1	31	13	1044	1	66	6	379
MALE												
FEMALE	4	295					3	229	1	66		
JOINT (MALE/FEMALE)	19	1458	2	233	1	31	10	815			6	379
ETHNICITY NOT AVAILABLE (TOTAL) 6/	138	9299	34	1858	10	930	57	3562	5	430	32	2519
MALE	33	2027	11	653	1	30	11	610	2	228	8	506
FEMALE	23	1662	3	153	1	68	13	868	1	38	5	535
JOINT (MALE/FEMALE)	52	3403	12	567	4	498	20	1249	1	31	15	1058
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	325	25521	91	8059	15	866	127	9523	26	2704	66	4369
MALE	98	7624	31	2864	6	383	28	2028	10	1043	23	1306
FEMALE	85	5981	17	1290	4	238	43	3046	4	278	17	1129
JOINT (MALE/FEMALE)	139	11786	43	3905	4	194	54	4370	12	1383	26	1934
OTHERS, INCLUDING HISPANIC (TOTAL)	345	21972	67	4137	5	319	190	12472	7	544	76	4500
MALE	103	6122	27	1506	3	210	50	3063	2	179	21	1164
FEMALE	119	7010	15	912	1	78	71	4358	3	230	29	1432
JOINT (MALE/FEMALE)	116	8343	25	1719	1	31	64	4740	2	135	24	1718
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	172	9034	25	1124	7	419	100	5856	2	83	38	1552
50-79% OF MSA/MD MEDIAN	212	14289	50	3801	6	403	104	6861	9	794	43	2430
80-99% OF MSA/MD MEDIAN	112	8620	26	1598	3	191	48	3815	9	1028	26	1988
100-119% OF MSA/MD MEDIAN	90	6879	21	1758	5	454	37	2493	6	513	21	1661
120% OR MORE OF MSA/MD MEDIAN	167	13761	51	4370	5	197	58	4541	10	1191	43	3462
INCOME NOT AVAILABLE 6/	24	2424	14	1310	3	421	6	585			1	108
TOTAL 14/	777	55007	187	13961	29	2085	353	24151	36	3609	172	11201

AGGREGATE TABLE 5-1: DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY INCOME, RACE AND ETHNICITY OF APPLICANT, 2016

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INCOME, RACE AND ETHNICITY	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	64					1	64				
ASIAN												
BLACK OR AFRICAN AMERICAN	4	300	1	51	1	70	2	179				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	25	2841	11	1187			8	990	5	577	1	87
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1	61					1	61				
RACE NOT AVAILABLE 6/	10	894	2	176	1	78	4	497			3	143
ETHNICITY 7/												
HISPANIC OR LATINO	10	943	5	585	1	78	1	90	1	88	2	102
NOT HISPANIC OR LATINO	24	2362	6	530	1	70	11	1145	4	489	2	128
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2	272	1	123			1	149				
ETHNICITY NOT AVAILABLE 6/	5	583	2	176			3	407				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	17	1896	5	479			7	841	4	489	1	87
OTHERS, INCLUDING HISPANIC	18	1640	7	759	2	148	6	543	1	88	2	102
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	35					1	35				
ASIAN	3	400	2	272			1	128				
BLACK OR AFRICAN AMERICAN	16	1930	10	1180			4	498	2	252		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	140	18350	99	13687	3	362	15	1852	19	2138	4	311
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	4	566	3	397					1	169		
RACE NOT AVAILABLE 6/	22	3034	9	1339	1	50	7	1005	5	640		
ETHNICITY 7/												
HISPANIC OR LATINO	39	4837	22	2965	1	145	10	1215	3	315	3	197
NOT HISPANIC OR LATINO	124	16416	92	12592	2	217	12	1448	17	2045	1	114
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	7	891	4	522			2	234	1	135		
ETHNICITY NOT AVAILABLE 6/	16	2171	5	796	1	50	4	621	6	704		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	102	13661	78	10771	2	217	7	935	14	1624	1	114
OTHERS, INCLUDING HISPANIC	67	8274	39	5099	1	145	17	1962	7	871	3	197

AGGREGATE TABLE 5-1: DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY INCOME, RACE AND ETHNICITY OF APPLICANT, 2016

INCOME, RACE AND ETHNICITY (CONTINUED)	MSA/MD: 17780 - COLLEGE STATION-BRYAN, TX											
	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	180	1	180								
ASIAN	2	450	2	450								
BLACK OR AFRICAN AMERICAN	7	1171	5	776			1	220	1	175		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	126	19928	85	14105	4	743	20	2670	13	1963	4	447
2 OR MORE MINORITY RACES	1	132	1	132								
JOINT (WHITE/MINORITY RACE)	5	723	4	569	1	154						
RACE NOT AVAILABLE 6/	18	2476	13	1827			1	83	4	566		
ETHNICITY 7/												
HISPANIC OR LATINO	27	3579	17	2365	1	154	6	653	3	407		
NOT HISPANIC OR LATINO	106	17550	73	12588	4	743	15	2237	11	1731	3	251
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	10	1487	9	1291							1	196
ETHNICITY NOT AVAILABLE 6/	17	2444	12	1795			1	83	4	566		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	93	15236	63	10823	3	589	14	2017	10	1556	3	251
OTHERS, INCLUDING HISPANIC	50	7380	36	5421	2	308	7	873	4	582	1	196
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN	5	977	2	428	2	367			1	182		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	109	20368	88	16795	1	124	7	1136	9	1724	4	589
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	4	954	4	954								
RACE NOT AVAILABLE 6/	11	2084	6	979	1	226	2	514	2	365		
ETHNICITY 7/												
HISPANIC OR LATINO	28	5105	26	4691					2	414		
NOT HISPANIC OR LATINO	84	15899	64	12590	3	491	7	1136	8	1492	2	190
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	7	1342	6	1138							1	204
ETHNICITY NOT AVAILABLE 6/	10	2037	4	737	1	226	2	514	2	365	1	195
MINORITY STATUS 8/												
WHITE NON-HISPANIC	76	14164	59	11404	1	124	7	1136	7	1310	2	190
OTHERS, INCLUDING HISPANIC	43	8182	37	7015	2	367			3	596	1	204



AGGREGATE TABLE 5-1: DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY INCOME, RACE AND ETHNICITY OF APPLICANT, 2016

INCOME, RACE AND ETHNICITY (CONTINUED)	MSA/MD: 17780 - COLLEGE STATION-BRYAN, TX											
	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	3	578	2	394			1	184				
BLACK OR AFRICAN AMERICAN	17	3673	13	2932			1	332	1	168	2	241
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	379	86723	285	66959	6	1511	31	6242	49	10582	8	1429
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	10	2165	7	1724					2	302	1	139
RACE NOT AVAILABLE 6/	43	10428	31	7500	3	1045	2	440	6	1289	1	154
ETHNICITY 7/												
HISPANIC OR LATINO												
HISPANIC OR LATINO	52	10828	42	9075			4	642	5	1001	1	110
NOT HISPANIC OR LATINO	332	77780	248	59838	7	2137	28	5871	39	8235	10	1699
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	26	5319	18	3661			1	245	7	1413		
ETHNICITY NOT AVAILABLE 6/	42	9640	30	6935	2	419	2	440	7	1692	1	154
MINORITY STATUS 8/												
WHITE NON-HISPANIC												
WHITE NON-HISPANIC	300	70428	224	54307	6	1511	26	5355	37	7936	7	1319
OTHERS, INCLUDING HISPANIC	106	22201	81	17595			7	1403	14	2713	4	490
TOTAL 14/	973	182207	689	135453	24	4730	112	17392	120	21092	28	3540

AGGREGATE TABLE 5-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY INCOME, RACE AND ETHNICITY OF APPLICANT, 2016

INCOME, RACE AND ETHNICITY	MSA/MD: 17780 - COLLEGE STATION-BRYAN, TX											
	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	3	100	2	56			1	44				
ASIAN	8	658	4	254	3	220	1	184				
BLACK OR AFRICAN AMERICAN	42	2127	5	218	1	30	25	1471	2	65	9	343
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	119	7742	36	3052	4	162	53	3348	4	267	22	913
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1	31	1	31								
RACE NOT AVAILABLE 6/	35	2348	7	326	1	63	22	1587	1	219	4	153
ETHNICITY 7/												
HISPANIC OR LATINO	65	3804	22	1335			33	2046			10	423
NOT HISPANIC OR LATINO	115	7525	28	2381	7	382	54	3628	5	294	21	840
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2	63					1	28			1	35
ETHNICITY NOT AVAILABLE 6/	26	1614	5	221	2	93	14	932	2	257	3	111
MINORITY STATUS 8/												
WHITE NON-HISPANIC	71	5120	18	1899	4	162	33	2295	4	267	12	497
OTHERS, INCLUDING HISPANIC	120	6743	33	1854	4	250	61	3773	2	65	20	801
50-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	3	128					2	105			1	23
ASIAN	12	1405	5	709	1	148	2	231	2	249	2	68
BLACK OR AFRICAN AMERICAN	35	2137	10	637	1	44	20	1275	1	31	3	150
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	305	31255	167	19531	19	1887	64	5351	25	2745	30	1741
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	5	565	1	163			3	237	1	165		
RACE NOT AVAILABLE 6/	47	4097	21	2317			16	957	3	351	7	472
ETHNICITY 7/												
HISPANIC OR LATINO	92	7336	35	3509	2	290	35	2270	6	561	14	706
NOT HISPANIC OR LATINO	252	27120	141	17158	17	1626	53	4444	23	2761	18	1131
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	9	882	6	682			2	177			1	23
ETHNICITY NOT AVAILABLE 6/	55	4298	22	2008	2	163	18	1314	3	219	10	594
MINORITY STATUS 8/												
WHITE NON-HISPANIC	212	23333	127	15572	15	1434	36	3185	18	2126	16	1016
OTHERS, INCLUDING HISPANIC	153	12364	57	5700	4	482	64	4297	10	1006	18	879

## AGGREGATE TABLE 5-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY INCOME, RACE AND ETHNICITY OF APPLICANT, 2016

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

INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	140	1	140								
ASIAN	8	1229	4	626			2	350	2	253		
BLACK OR AFRICAN AMERICAN	15	1289	5	462			5	413			5	414
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	236	29887	155	21270	9	913	33	3471	23	3010	16	1223
2 OR MORE MINORITY RACES	1	73									1	73
JOINT (WHITE/MINORITY RACE)	2	181	1	122			1	59				
RACE NOT AVAILABLE 6/	45	5424	18	2465	1	176	15	1275	9	1409	2	99
ETHNICITY 7/												
HISPANIC OR LATINO	38	3455	12	1184	1	148	17	1299	3	529	5	295
NOT HISPANIC OR LATINO	220	28818	148	20834	8	765	25	3139	24	2991	15	1089
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	4	511	2	313			2	198				
ETHNICITY NOT AVAILABLE 6/	46	5439	22	2754	1	176	12	932	7	1152	4	425
MINORITY STATUS 8/												
WHITE NON-HISPANIC	194	25846	137	19415	8	765	19	2478	20	2481	10	707
OTHERS, INCLUDING HISPANIC	69	6878	25	2847	1	148	27	2319	5	782	11	782
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	2	316	1	188	1	128						
ASIAN	15	2670	12	1985					2	397	1	288
BLACK OR AFRICAN AMERICAN	15	1186	1	65			9	653	1	177	4	291
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	199	29498	129	21468	10	1026	32	3569	16	2456	12	979
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	4	347	1	140			2	119			1	88
RACE NOT AVAILABLE 6/	45	4846	20	2992	4	302	17	1216			4	336
ETHNICITY 7/												
HISPANIC OR LATINO	40	4522	21	3067	1	118	14	1061			4	276
NOT HISPANIC OR LATINO	194	29183	124	20676	10	1036	29	3207	18	2964	13	1300
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	10	935	3	476			4	248	1	66	2	145
ETHNICITY NOT AVAILABLE 6/	36	4223	16	2619	4	302	13	1041			3	261
MINORITY STATUS 8/												
WHITE NON-HISPANIC	163	25029	110	18423	9	908	21	2587	15	2390	8	721
OTHERS, INCLUDING HISPANIC	85	9788	38	5733	2	246	29	2081	4	640	12	1088

AGGREGATE TABLE 5-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY INCOME, RACE AND ETHNICITY OF APPLICANT, 2016

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

INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 20/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	7	1013	5	815					2	198		
ASIAN	144	29346	113	23776	5	1291	7	990	16	2841	3	448
BLACK OR AFRICAN AMERICAN	34	7449	12	4161	4	784	10	915	3	810	5	779
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	2	240	2	240								
WHITE	1822	397470	1432	319122	67	14579	107	18881	180	41407	36	3481
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	26	6745	19	5533	1	388	1	122	3	546	2	156
RACE NOT AVAILABLE 6/	265	58278	187	40982	12	2846	24	5835	34	7717	8	898
ETHNICITY 7/												
HISPANIC OR LATINO	124	21858	90	16850	4	655	17	2425	9	1488	4	440
NOT HISPANIC OR LATINO	1820	402855	1434	323129	67	15306	103	18241	187	43072	29	3107
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	74	14398	55	12318	5	628	3	193	6	772	5	487
ETHNICITY NOT AVAILABLE 6/	282	61430	191	42332	13	3299	26	5884	36	8187	16	1728
MINORITY STATUS 8/												
WHITE NON-HISPANIC	1609	357981	1282	288206	56	12718	86	16231	164	38929	21	1897
OTHERS, INCLUDING HISPANIC	404	79975	292	62978	19	3746	38	4645	38	6469	17	2137
TOTAL 14/	3782	712173	2616	545420	148	26113	496	58429	344	68795	178	13416





**Appendix – D HUD FOIA Discrimination Complaints Request Response**  
**(None to date)**

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January 7, 2020

Fort Worth Regional Office of FHEO  
U.S. Department of Housing and Urban Development  
801 Cherry Street, Unit #45, Suite 2500  
Fort Worth, Texas 76102

Re: Request for Information Regarding Fair Housing Complaints in Bryan, Texas

Dear Sir or Madam:

As part of the upcoming City of Bryan's 2020-2024 Five-Year Consolidated Plan submission to the U.S. Department of Housing and Urban Development, the City is required to certify that it is affirmatively furthering fair housing under 24 CFR 91.225(a)(1) and that the City must conduct an update to the Analysis of Impediments to Fair Housing Choice. Toward that end, the Community Development Department would like to please request information from The FHEO records of any fair housing complaint cases originating in Bryan, Texas for the period of January 1, 2015 – December 31, 2019. Specifically, we would like to request the case title and date, status, a brief summary, and how the case was resolved. If this information is available on the internet, please provide the website address.

A reply by mail or by e-mail stating whether FHEO has any information responsive to this request would be greatly appreciated.

Thank you for your assistance.

Regards,

Art Roach, Assistant Manager  
Community Development Services  
City of Bryan  
PO Box 1000  
Bryan TX 77805  
[aroach@bryantx.gov](mailto:aroach@bryantx.gov)





June 4, 2020

Fort Worth Regional Office of FHEO  
U.S. Department of Housing and Urban Development  
801 Cherry Street, Unit #45, Suite 2500  
Fort Worth, Texas 76102

Re: Request for Information Regarding Fair Housing Complaints in Bryan, Texas

Dear Sir or Madam:

This is the second request for this information. The original was dated and mailed January 7, 2020. As part of the upcoming City of Bryan's 2020-2024 Five-Year Consolidated Plan submission to the U.S. Department of Housing and Urban Development, the City is required to certify that it is affirmatively furthering fair housing under 24 CFR 91.225(a)(1) and that the City must conduct an update to the Analysis of Impediments to Fair Housing Choice. Toward that end, the Community Development Department would like to please request information from The FHEO records of any fair housing complaint cases originating in Bryan, Texas for the period of January 1, 2015 – December 31, 2019. Specifically, we would like to request the case title and date, status, a brief summary, and how the case was resolved. If this information is available on the internet, please provide the website address. A table of information would be appreciated, or, if there were no complaints originating in the City of Bryan, please provide a statement that there were no complaints during this period.

A reply by mail or by e-mail stating whether FHEO has any information responsive to this request would be greatly appreciated.

Thank you for your assistance.

Regards,

Art Roach, Assistant Manager  
Community Development Services  
City of Bryan  
PO Box 1000  
Bryan TX 77805  
[aroach@bryantx.gov](mailto:aroach@bryantx.gov)

**Appendix – E TWC Public Information Discrimination Complaints Request  
Response (None to date)**

---



January 7, 2020

Texas Workforce Commission  
Civil Rights Division  
1215 Guadalupe St  
Austin, Texas 78701

Re: Request for Information Regarding Fair Housing Complaints in Bryan, Texas

Dear Sir or Madam:

As part of the upcoming City of Bryan's 2020-2024 Five-Year Consolidated Plan submission to the U.S. Department of Housing and Urban Development, the City is required to certify that it is affirmatively furthering fair housing under 24 CFR 91.225(a)(1) and that the City must conduct an update to the Analysis of Impediments to Fair Housing Choice. Toward that end, the Community Development Department would like to please request information from The Texas Workforce Commission Civil Rights Division concerning records of any fair housing complaint cases originating in Bryan, Texas for the period of January 1, 2015 – December 31, 2019 under the Texas Fair Housing Act. Specifically, we would like to request the case title and date, status, a brief summary, and how the case was resolved. If this information is available on the internet, please provide the website address.

A reply by mail or by e-mail stating whether the TWCCRD has any information responsive to this request would be greatly appreciated.

Thank you for your assistance.

Regards,

Art Roach, Assistant Manager  
Community Development Services  
City of Bryan  
PO Box 1000  
Bryan TX 77805  
[aroach@bryantx.gov](mailto:aroach@bryantx.gov)



CITY OF BRYAN

*The Good Life, Texas Style.™*

June 4, 2020

Texas Workforce Commission  
Civil Rights Division  
1215 Guadalupe St  
Austin, Texas 78701

Re: Request for Information Regarding Fair Housing Complaints in Bryan, Texas

Dear Sir or Madam:

This is the second request for this information. The original was dated and mailed January 7, 2020. As part of the upcoming City of Bryan's 2020-2024 Five-Year Consolidated Plan submission to the U.S. Department of Housing and Urban Development, the City is required to certify that it is affirmatively furthering fair housing under 24 CFR 91.225(a)(1) and that the City must conduct an update to the Analysis of Impediments to Fair Housing Choice. Toward that end, the Community Development Department would like to please request information from The Texas Workforce Commission Civil Rights Division concerning records of any fair housing complaint cases originating in Bryan, Texas for the period of January 1, 2015 – December 31, 2019 under the Texas Fair Housing Act. Specifically, we would like to request the case title and date, status, a brief summary, and how the case was resolved. If this information is available on the internet, please provide the website address. A table of information would be appreciated, or, if there were no complaints originating in the City of Bryan, please provide a statement that there were no complaints during this period.

A reply by mail or by e-mail stating whether the TWCCRD has any information responsive to this request would be greatly appreciated.

Thank you for your assistance.

Regards,

Art Roach, Assistant Manager  
Community Development Services  
City of Bryan  
PO Box 1000  
Bryan TX 77805  
[aroach@bryantx.gov](mailto:aroach@bryantx.gov)

**From:** [Roach, Arthur](#)  
**To:** ["open.records@twc.state.tx.us"](mailto:open.records@twc.state.tx.us)  
**Cc:** [Bond, Alsie J](#)  
**Subject:** Request for Information Regarding Fair Housing Complaints in Bryan, Texas  
**Date:** Wednesday, August 12, 2020 3:49:00 PM  
**Attachments:** [image001.png](#)  
[TWC Req2.pdf](#)  
[TWC Req.pdf](#)

---

As part of the upcoming City of Bryan's 2020-2024 Five-Year Consolidated Plan submission to the U.S. Department of Housing and Urban Development, the City is required to certify that it is affirmatively furthering fair housing under 24 CFR 91.225(a)(1) and that the City must conduct an update to the Analysis of Impediments to Fair Housing Choice. Toward that end, the Community Development Department would like to please request information from The Texas Workforce Commission Civil Rights Division concerning records of any fair housing complaint cases originating in Bryan, Texas for the period of January 1, 2015 – December 31, 2019 under the Texas Fair Housing Act. Specifically, we would like to request the case title and date, status, a brief summary, and how the case was resolved.

Please note that two previous requests for this information were mailed via the U.S. Postal Service on January 1, 2020 and June 4, 2020, so this information may have already been processed, however we have not received a reply. Please see copies attached.

We greatly appreciate your assistance.

Regards,

Art Roach, Assistant Manager  
Community Development Services Dept.  
City of Bryan  
PO Box 1000  
1803 Greenfield Plaza  
Bryan, TX 77805  
(979) 209-5173  
aroach@bryantx.gov



**From:** [Open Records](#)  
**To:** [Roach, Arthur](#)  
**Subject:** Request for Information Regarding Fair Housing Complaints in Bryan, Texas  
**Date:** Thursday, August 13, 2020 10:04:42 AM

---

**Notice: EXTERNAL EMAIL! Phishing = #1 threat to Cyber Security. Is this a phishing email? – Look again!**

---

Dear Mr. Roach,

The Open Records Department received your email request. Your request has been assigned the Request Job#: 200812-028.

This communication acknowledges receipt of your email request dated August 12, 2020.

Your request is currently being processed and we will provide you with the results of our search as soon as they become available.

If you have any questions, please feel free to communicate.

Thank you.

Open Records  
Texas Workforce Commission  
101 E. 15<sup>th</sup> Street, Room 266  
Austin, TX 78778-0001  
Tel: 512-463-2422

[open.records@twc.state.tx.us](mailto:open.records@twc.state.tx.us)

## Appendix – F Affirmative Marketing Policy

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### Affirmative Marketing Policy and Implementing Procedures

#### Statement of Policy

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

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

The City of Bryan is committed to the goals of affirmative marketing, which will be implemented in our affordable housing programs through a specific set of steps that the City and participating owners will follow. These goals will be reached through the following procedures:

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

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

The City will:

- Inform the public by placing a special news release in The Eagle.
- Inform potential tenants or purchasers by providing informational materials about the program to the B/CS Association of Realtors for membership distribution.
- Inform owners, builders and developers by providing information materials to the Home Builders Association for membership distribution to those who may participate in the City programs.

The City will provide a copy of the Affirmative Marketing Policy to all builders/developers participating in City housing programs.

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

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

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

The City will make information about available properties known by:

- ~~Advertising to the public in The Eagle, which is the newspaper of general circulation.~~
- We will advertise after special outreach efforts to inform persons otherwise not likely to apply proves unsuccessful.
- Providing public notice at the Community Development Advisory Committee (CDAC) meeting.

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

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

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

4 **Record Keeping**

The City will keep records of the following:

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

We will also require that organizations receiving federal housing funds through the Community Development Services Department to keep a record of how available properties were marketed.

5. **Assessment and Corrective Actions**

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

**a) To determine if good faith efforts have been made:**

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

**b) To determine results:**

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



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

The City of Bryan will carry out assessment activities and complete a written assessment of affirmative marketing efforts to be included in the annual performance report to HUD. This assessment will cover marketing relative to units constructed or rehabilitated and first made available for occupancy during that year.

### **Affirmative Marketing Techniques**

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

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

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

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

### **Affirmative Marketing Mailing List**

Brazos Valley Affordable Housing Corporation 3971 E. 29<sup>th</sup> Street  
Bryan, Texas 77802

Brazos Valley Council of Governments 3991 E. 29<sup>th</sup> Street  
Bryan Texas 77802

Housing Authority of Bryan 1306 Beck Street  
Bryan, Texas 77803

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

Lone Star Legal Aid 1714 E. 29<sup>th</sup> Street Bryan, Texas 77802

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

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Habitat for Humanity 119 Lake

Bryan, Texas 77801

National Association for the Advancement of Colored People (NAACP) Brazos County Branch

PO Box 665

Bryan, TX 77806

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

Pintail Loop

College Station, TX 77845 [lulackelly@neo.tamu.edu](mailto:lulackelly@neo.tamu.edu)

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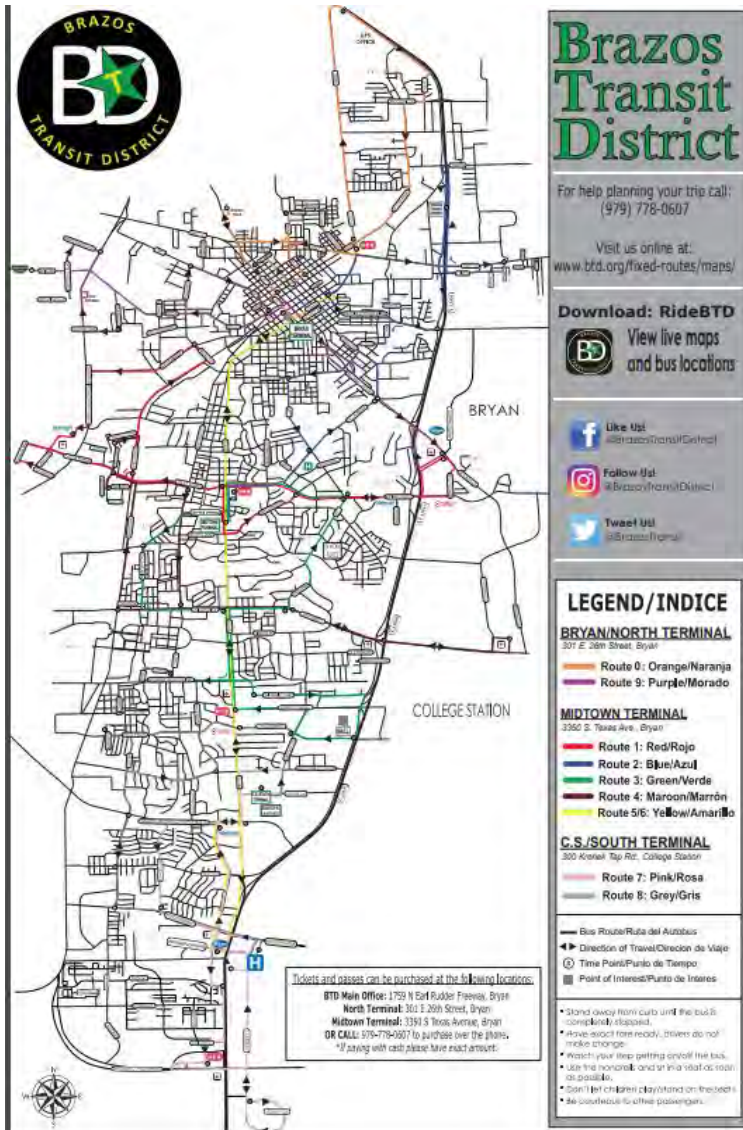
## **Appendix – G      ADA Self-Evaluation and Transition Plan and Updates**

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA also requires that all Programs, Services and Activities (PSAs) of public entities provide equal access for individuals with disabilities. The City of Bryan has undertaken a comprehensive evaluation of its policies, programs, and facilities to determine the extent to which individuals with disabilities may be restricted in their access to City services and activities. An accessibility inventory of sidewalks and curb ramps on streets and near City facilities was completed, a Transition Plan Coordinator was appointed, and a systematic approach was adopted to remove all identified barriers. The City adopted its original ADA Transition Plan in 2015, and has published annual updates. The City has made significant progress in achieving the goals of the Transition Plan. The full plan and annual updates are available for the public to review on the City's website:

<https://www.bryantx.gov/ada/#transition-plan>

# Appendix – F Public Transit Route Maps (UPDATED 2-27-2020)

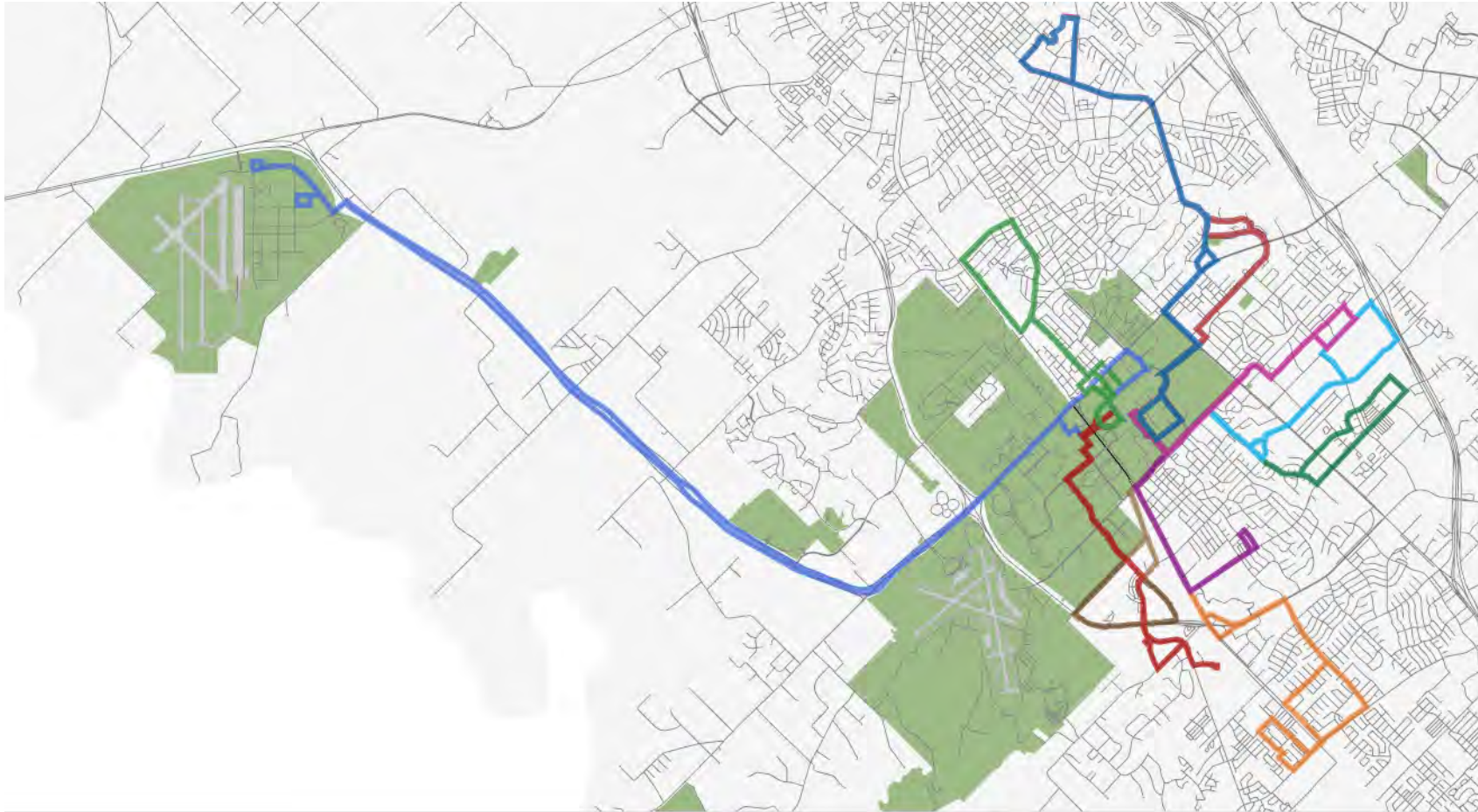
## Brazos Transit District Bryan/College Station Bus Route Map



CASH FARES		REDUCED CASH FARES	
General Public one-way	\$1.00	Seniors one-way with <i>S-Pass</i> (65 and over)	\$0.50
Children 6-12 one-way	\$0.50	Disabled one-way with <i>D-Pass</i>	\$0.50
Children under 6 with Paying Customer	FREE	Medicare one-way with Medicare Card	\$0.50
TICKETS & PASSES		REDUCED TICKETS & PASSES	
Day Pass Unlimited trips in one calendar day	\$3.50	Day Pass Unlimited trips in one calendar day	\$1.75
Weekly Pass Unlimited trips in 5 consecutive weekdays	\$15.00	Weekly Pass Unlimited trips in 5 consecutive weekdays	\$7.50
Monthly Pass Unlimited trips for 31 consecutive days	\$45.00	Monthly Pass Unlimited trips for 31 consecutive days	\$22.50
Multi-Ride Pass (42 one-way trips)	\$42.00	*S&D Punch Pass (40 one-way trips)	\$20.00
Ticket Book (40 one-way trips)	\$40.00		
BTD TAMU Pass (valid Jan.-Dec.) For non-students to ride the Aggie Spirit Buses. Routes can be found here.	\$35.00		

Source: Bryan Transit District (<http://www.btd.org/BryanCollegeStation.htm>)

### Texas A&M University Bus Routes



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