

ASSESSMENT OF FAIR HOUSING

City of Corpus Christi, Texas

January 4, 2018

MORNINGSIDE
RESEARCH AND
CONSULTING, INC

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January 4, 2018

Submitted by

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I. Cover Sheet

I. Cover Sheet

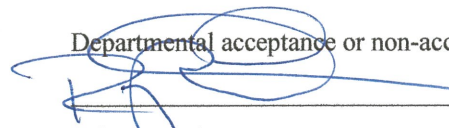
1. Submission date: To be determined
2. Submitter name: City of Corpus Christi, Texas
3. Type of submission (e.g., single program participant, joint submission): Single program participant
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5. For PHAs, Jurisdiction in which the program participant is located: n/a
6. Submitter members (if applicable): n/a
7. Sole or lead submitter contact information:
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 - b. Title: Director
 - c. Department: Housing and Community Development
 - d. Street address: 1201 Leopard Street
 - e. City: Corpus Christi
 - f. State: Texas
 - g. Zip code: 78401
8. Period covered by this assessment: 2017-2021
9. Initial, amended, or renewal AFH: Initial
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

(Signature) (date)

(Signature) (date)

(Signature) (date)

Departmental acceptance or non-acceptance:


(Signature) (date) 12/29/17

Comments

II. Executive Summary

II EXECUTIVE SUMMARY

- a) **Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.**

OVERVIEW

This Assessment of Fair Housing (AFH) is a process that U.S. Department of Housing and Urban Development (HUD) grant recipients must undertake in keeping with their obligation to “affirmatively further fair housing” (AFFH) in accordance with the Fair Housing Act. This report follows HUD guidance for completing the AFH and includes data and maps provided by HUD, as well as data and analysis gathered from the local community and secondary data sources such as the U.S. Census.

This AFH includes a detailed fair housing analysis of the City of Corpus Christi, Texas, that includes the following components:

DEMOGRAPHIC SUMMARY. This section provides a summary of the race and ethnicity, national origin, language, disability status, sex, age, and family status of residents of the City of Corpus Christi. The section also compares data over time to highlight demographic trends in Corpus Christi since 1990. According to HUD data, Corpus Christi has a predominately Hispanic population (59.7 percent); approximately one-third of residents are Non-Hispanic White, 3.9 percent are Black, and 3.1 percent are of some other race.

SEGREGATION/INTEGRATION. This section analyzes the location of Corpus Christi residents by race and ethnicity and determines levels of segregation based on the dissimilarity of different groups. The highest segregation in Corpus Christi is between Black and Non-Hispanic White residents.

RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAPs). A R/ECAP is an area of a city that has a majority Non-White population and poverty rate that is either above 40 percent or three times the regional average. The January 2017 AFFH maps from HUD indicate that seven areas of Corpus Christi are defined as R/ECAPs. R/ECAPs in Corpus Christi have a much higher proportion of Hispanic residents (80 percent) than in the City of Corpus Christi and the Corpus Christi region (Nueces and San Patricio counties). The R/ECAPs also have a higher percentage of Black residents than in the jurisdiction and region.

DISPARITIES IN ACCESS TO OPPORTUNITY. This section analyzes a variety of indicators to determine whether Corpus Christi residents have access to proficient schools, nearby jobs, inexpensive transportation, robust labor markets, and environmentally healthy neighborhoods, regardless of their location or protected class. The groups with the least access to these opportunities are

Hispanic and Non-Hispanic Black, who mostly live in City Council Districts 1, 2, and 3 near the city center.

DISPROPORTIONATE HOUSING NEEDS. This section analyzes rates of housing cost burden, overcrowding, and substandard housing across different racial and ethnic groups and in different areas of the city. Non-Hispanic Black residents are the most likely to experience housing burden in Corpus Christi. Hurricane Harvey made landfall north of Corpus Christi in late August 2017 at the close of the AFH data collection process. No geographic patterns have been identified to date which would suggest disparate impact from the hurricane on protected class groups. **PUBLICLY SUPPORTED HOUSING ANALYSIS.** This section discusses the location and occupancy of publicly supported housing units in Corpus Christi, including public housing units, project-based Section 8 units, and units in the Housing Choice Voucher program. According to the data, Hispanic residents make up the majority of households in all categories of publicly supported housing in Corpus Christi.

DISABILITY AND ACCESS ANALYSIS. This section reviews the location of Corpus Christi residents with disabilities and the resources available to these residents. The City of Corpus Christi provides some accommodation for services, programs, activities, and facilities and awards community development funds to organizations such as Coastal Bend Center for Independent Living (CBCIL) and Corpus Christi Council for The Deaf and Hard of Hearing Center to provide assistance to residents with disabilities. The Corpus Christi Regional Transportation Authority (CCRTA) provides accessible public transportation for residents with disabilities.

FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, AND RESOURCES ANALYSIS. This section discusses the organizations responsible for enforcing fair housing in Corpus Christi. This includes the City of Corpus Christi Human Relations Division (CCHRD), which is a HUD-certified Fair Housing Assistance Program (FHAP) responsible for investigating fair housing complaints and enforcing violations. The section also discusses various state and local laws that may increase fair housing concerns, including state law which enables source of income discrimination.

FAIR HOUSING ISSUES

Based on the input received from stakeholders and residents during the community participation process, the assessment of past fair housing goals and action, and each component of the fair housing analysis, the following factors contribute to each fair housing issue identified in the City of Corpus Christi. The highest priority is given to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Fair Housing Issues and Contributing Factors in the City of Corpus Christi

Fair Housing Issues	Contributing Factors (by priority level)
Segregation/Integration	<ol style="list-style-type: none"> 1. Location and type of affordable housing 2. Lack of public investments in specific neighborhoods, including services or amenities 3. Lack of community revitalization strategies 4. Displacement of residents due to economic pressures 5. Private discrimination 6. Source of income discrimination 7. Community opposition
Racially or Ethnically-Concentrated Areas of Poverty (R/ECAPs)	<ol style="list-style-type: none"> 1. Lack of public investments in specific neighborhoods, including services or amenities 2. Lack of private investments in specific neighborhoods 3. Source of income discrimination 4. Private discrimination 5. Deteriorated or abandoned properties
Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Location and type of affordable housing 2. Location of employers 3. Location of environmental health hazards 4. Location of proficient schools and school assignment policies 5. Lack of regional cooperation 6. Private discrimination 7. Source of income discrimination 8. Loss of affordable housing 9. Availability, type, frequency, and reliability of public transportation
Disproportionate Housing Needs	<ol style="list-style-type: none"> 1. Lack of public investments in specific neighborhoods, including services or amenities 2. Lack of private investments in specific neighborhoods 3. Displacement of residents due to economic pressures 4. Source of income discrimination 5. Loss of affordable housing
Publicly Supported Housing Location and Occupancy	<ol style="list-style-type: none"> 1. Lack of public investments in specific neighborhoods, including services or amenities 2. Impediments to mobility 3. Lack of regional or local cooperation 4. Community opposition
Disabilities and Access	<ol style="list-style-type: none"> 1. Lack of affordable, accessible housing in a range of unit sizes 2. Location of accessible housing 3. Lack of assistance for housing accessibility modifications 4. State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings 5. Access to publicly supported housing for persons with disabilities 6. Lack of affordable in-home or community-based supported services
Fair Housing Enforcement, Outreach Capacity, and Resources	<ol style="list-style-type: none"> 1. Lack of local private fair housing outreach and enforcement 2. Lack of state or local fair housing laws*

*The Texas legislature passed a bill prohibiting cities from passing bans on source of income discrimination.

Fair housing goals for the City of Corpus Christi are based on the fair housing analysis and the results for each housing issue listed in the table above. The goals shown in the table below are designed to address the fair housing issues and overcome the contributing factors identified. The goals consider all analysis conducted for the report, including input from the community and the consideration of past fair housing goals and actions that the City of Corpus Christi has undertaken.

Fair Housing Goals for the City of Corpus Christi		
Fair Housing Goals	Contributing Factors	Fair Housing Issues
1. Expand development of affordable housing in high opportunity, environmentally healthy areas of Corpus Christi.	<ul style="list-style-type: none"> ▪ Location and type of affordable housing ▪ Deteriorated or abandoned properties ▪ Lack of private investments in specific neighborhoods ▪ Loss of affordable housing ▪ Community opposition ▪ Lack of affordable, accessible housing in a range of unit sizes 	<ul style="list-style-type: none"> ▪ Segregation/Integration ▪ R/ECAPs ▪ Disparities in Access to Opportunity ▪ Disproportionate Housing Needs ▪ Disabilities and Access
2. Educate landlords on fair housing issues and laws.	<ul style="list-style-type: none"> ▪ Source of income discrimination ▪ Private discrimination ▪ Lack of access to opportunity due to high housing costs ▪ Impediments to mobility 	<ul style="list-style-type: none"> ▪ Segregation/Integration ▪ R/ECAPs ▪ Disparities in Access to Opportunity ▪ Disproportionate Housing Needs ▪ Publicly Supported Housing Location and Occupancy
3. Improve access to public services and amenities in low opportunity areas of Corpus Christi.	<ul style="list-style-type: none"> ▪ Lack of public investments in specific neighborhoods, including services or amenities ▪ Lack of community revitalization strategies ▪ Location of proficient schools and school assignment policies ▪ Availability, type, frequency, and reliability of public transportation 	<ul style="list-style-type: none"> ▪ Segregation/Integration ▪ R/ECAPs ▪ Disparities in Access to Opportunity ▪ Disproportionate Housing Needs ▪ Publicly Supported Housing Location and Occupancy
4. Increase the number of accessible housing units for people with disabilities.	<ul style="list-style-type: none"> ▪ Lack of affordable, accessible units in a range of unit sizes ▪ Location of accessible housing ▪ Access to publicly supported housing for persons with disability ▪ Location and type of affordable housing 	<ul style="list-style-type: none"> ▪ Disabilities and Access ▪ Disparities in Access to Opportunity
5. Engage in a public awareness campaign to reduce community resistance to affordable housing in high opportunity areas.	<ul style="list-style-type: none"> ▪ Lack of regional cooperation ▪ Lack of public investments in specific neighborhoods, including services or amenities ▪ Private discrimination ▪ Community opposition ▪ Lack of local private fair housing outreach and enforcement ▪ Lack of state or local fair housing laws 	<ul style="list-style-type: none"> ▪ Segregation/Integration ▪ R/ECAPs ▪ Disparities in Access to Opportunity ▪ Publicly Supported Housing Location and Occupancy ▪ Fair Housing Enforcement, Outreach Capacity, and Resource

III. Community Participation

III COMMUNITY PARTICIPATION

- a) **Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.**
- b) **Provide a list of organizations consulted during the community participation process.**
- c) **Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?**
- d) **Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.**

SUMMARY OF OUTREACH ACTIVITIES

The community participation process included the following activities, each of which is summarized in this chapter:

- Resident survey
- Interview with fair housing stakeholders
- Focus group with fair housing stakeholders
- Focus group with Corpus Christi residents
- Fair housing public meeting
- Public hearing

In order to obtain input from Corpus Christi residents for the Assessment of Fair Housing (AFH), Morningside Research and Consulting (Morningside) developed a plan for gathering community input in collaboration with staff from the Department of Housing and Community Development in Corpus Christi and the public information officer for the city. The plan was designed to seek meaningful engagement from residents and stakeholders in order to gather information from

residents on fair housing and housing choice issues in Corpus Christi. The plan included suggested invitees and press release information for submission to various media outlets.

Corpus Christi staff conducted outreach to the public through a City Manager update on July 25, 2017 during a city council meeting which was video recorded and made available online, through city news releases on July 25 and August 4 which were posted on the city newsroom website and were also promoted through Facebook and Twitter, and in an employee newsletter. Staff also conducted outreach through email and in-person communication with community stakeholders who distributed surveys and event invitations to their clients and residents throughout the city. The city created a web interface on the city website for the Assessment of Fair Housing, which can be viewed here: <http://www.cctexas.com/fairhousingassessment>.

A notice of the public hearing was posted in the Corpus Christi Caller Times daily newspaper in both English and Spanish.

The Facebook and Twitter posts for the resident survey are shown below.

City of Corpus Christi - Government
Published by Sprout Social (?) · October 19 · 🌐

We need your opinion!
Take a look at the Fair Housing Assessment and let us know what you think. If you have questions, give the Housing and Community Development Department a call at 361-826-3021.

SHARE YOUR THOUGHTS

FAIR HOUSING ASSESSMENT

Submit your comments through
November 20, 2017
More Info:

Fair Housing Assessment | City of Corpus Christi
Lake Corpus Christi is over 100% capacity. Officials are releasing water to accommodate more inflow. Learn more about the water release at www.cctexas.com/waterreleases
WWW.CCTEXAS.COM

👍 Get More Likes, Comments and Shares
When you boost this post, you'll show it to more people.

👤 746 people reached [Boost Post](#)

746 People Reached

2 Likes, Comments & Shares ⓘ

2 Likes	2 On Post	0 On Shares
0 Comments	0 On Post	0 On Shares
0 Shares	0 On Post	0 On Shares

25 Post Clicks

0 Photo Views	17 Link Clicks	8 Other Clicks ⓘ
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NEGATIVE FEEDBACK

1 Hide Post	0 Hide All Posts
0 Report as Spam	0 Unlike Page

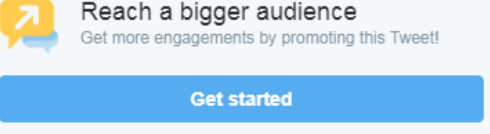
Reported stats may be delayed from what appears on posts

Tweet Activity



City of Corpus Christi @cityofcc
 We need your opinion! Take a look at the Fair Housing Assessment and let us know what you think.
[http://www.cctexas.com/fairhousingassessment ...](http://www.cctexas.com/fairhousingassessment...)
pic.twitter.com/Hw0S0cuoOC

Impressions	1,040
Total engagements	10
Link clicks	4
Media engagements	3
Retweets	1
Likes	1
Detail expands	1



Reach a bigger audience
 Get more engagements by promoting this Tweet!

Get started

This outreach process elicited broad community participation. The resident survey was completed by 237 residents, and individuals participated in two stakeholder focus groups (14), interviews (10), two resident focus groups (20) and a public meeting (11). In some cases, stakeholders who were interviewed also came to a focus group and were not counted twice. The table below shows the complete list of organizations represented in interviews, focus groups, and the public meeting.

Table III-1 Organizations Represented in Community Participation

Organizations Engaged	
Rio Grande Legal Aid	Coastal Bend Center for Independent Living
Habitat for Humanity	Corpus Christi Housing Authority
City of Corpus Christi Human Relations Department	Blue Wave Construction
Methodist Health Care	Prime Real Estate
City of Corpus Christi Planning Division	Corpus Christi Association of Realtors
Corpus Christi Metro Ministries	Catholic Charities Housing
Braselton Homes	Mortgage Financial Services
Citizens Alliance for Fairness and Progress	The Salvation Army
Family Endeavors	Keller Williams Coastal Bend
Texas Low Income Housing Information Service	

FAIR HOUSING STAKEHOLDER AND RESIDENT ENGAGEMENT

Representatives of the following organizations were interviewed:

- Rio Grande Legal Aid
- Habitat for Humanity
- City of Corpus Christi Human Relations Department
- Coastal Bend Center for Independent Living
- Corpus Christi Housing Authority

- Blue Wave Construction
- Braselton Homes
- Mortgage Financial Services
- Citizens Alliance for Fairness and Progress
- Texas Low Income Housing Information Service
- Corpus Christi Planning Division

In addition, two 1.5-hour focus groups were held with fair housing stakeholders in Corpus Christi at the following times:

- Thursday August 10, 2017 at 2:45pm
- Friday August 11, 2017 at 9:00am.

Both focus groups were held at the City Council Chambers at City Hall.

Two focus groups were held to gather insight from residents of Corpus Christi. One focus group was at Broadmoor Senior Center with 11 participants and one was at Greenwood Senior Center with 16 participants. Email invitations included a statement in Spanish that requests for translation could be made prior to the meetings. All written materials used during the focus groups were available in English and Spanish. Spanish-speaking translators were available during both focus groups and provided translation to Spanish-speaking attendees.

Lunches were provided at these focus groups. The dates and times of the focus groups are below:

- Broadmoor Senior Center Focus Group: Thursday August 10, 2017 at 11:30am
- Greenwood Senior Center Focus Group: Friday August 11, 2017 at 11:30am

At one focus group, all participants were seniors, and the other was a mix of seniors, adults, and young adults. Each focus group had a mix of renters and homeowners. Racial and ethnic identity was not asked of participants. Spanish language interpretation was provided by Spanish-speaking city employees to communicate with several non-English-speaking attendees.

THEMES

The following themes emerged from the interviews and focus groups with fair housing stakeholders and residents in Corpus Christi resulted in the following themes.

FAIR HOUSING ACTIVITIES IN CORPUS CHRISTI. Corpus Christi has a strong network of stakeholders engaged in fair housing issues. The Human Relations Department of Corpus Christi is a local Fair Housing Assistance Program (FHAP) that receives fair housing discrimination calls and investigates fair housing complaints for the city. The department is one of five local FHAPs in Texas. Having a local FHAP benefits Corpus Christi, as the department is able to provide local support to the community and conduct outreach through community partners. FHAP office staff,

including the administrator, participated in an interview and focus group to provide information about the nature of complaints received by the office.

In addition to investigating complaints, FHAP office staff attend community events to educate the community on fair housing issues. Between July 1, 2016, and July 1, 2017, FHAP office staff attended 18 events in the community as shown in the table below.

Table III-2 Corpus Christi Human Relations Department Fair Housing Outreach Events Since July 1, 2016

Name of Event	Audience	Type
Operation Safe Return	Public	Outreach
Project Homeless Connect Corpus Christi	Public	Outreach
Department of Labor	DOL Employees	Outreach
3rd Annual - Young Women in Leadership	Public	Outreach
8th Annual Walk 'N Roll Event	Public	Outreach
George Evans Elementary Halloween	Elementary Students	Outreach
Life After Graduation	High School Students with Disabilities	Outreach
Life After Graduation	High School Students with Disabilities	Training
Del Mar College - Job Fair	College Students	Outreach
South Texas Lighthouse for the Blind	Public	Outreach
Candlewood Apts./The Bay Club	Employees	Training
Del Mar College	College Students	Outreach
Prospera	Employees	Training
City Hall in the Mall	Public	Outreach
Rubber Duck Round-Up	Public	Outreach
Nueces County Courthouse	Public	Outreach
Corpus Christi Apartment Association Annual Training Seminar	CCAA Members	Training
Corpus Christi Apartment Association Annual Trade Show	CCAA Members	Outreach

Despite these efforts, stakeholders engaged in this process believe community and stakeholder education on fair housing could be improved. In resident focus groups, most participants did not know whom to call about a fair housing complaint. Brochures for the Human Relations Department of Corpus Christi were distributed to all participants.

In 2015, Corpus Christi residents in an historically segregated African American community on the north side of the city filed a Title VI civil rights complaint with the Federal Highway Administration (FHWA) related to segregation and environmental quality. The complaint was filed by residents of Hillcrest and Washington-Coles neighborhoods on the north side of Corpus Christi, designated for African-American residents during Jim Crow segregation, bordered by a heavy industrial zone called “refinery row” outside the city to the north and isolated from the rest of the city by Interstate 37. In 2012, the Texas Department of Transportation (TxDOT)

proposed the Harbor Bridge relocation, which would cut directly through the Washington-Coles neighborhood, further isolating both neighborhoods from the rest of the city and increasing pollution in the area. The area is already affected by neighboring refineries and highways. In December 2015, the residents of the north side reached a mitigation agreement with TxDOT that resulted in a voluntary relocation program for residents in the Hillcrest and Washington-Coles neighborhoods with TxDOT providing relocation counseling and financial assistance with moving, among other assistance. Additional detail about this agreement and a detailed history of the policies and practices which led to the conditions in the Hillcrest and Washington-Coles neighborhoods can be found in a report prepared by Texas Rio Grande Legal Aid, available at this website: <https://savehillcrestfromharborbridge.files.wordpress.com/2015/03/title-vi-complaint-final-w-signatures.pdf>.

Several staff of Texas Rio Grande Legal Aid and two residents active in the affected neighborhood participated in the AFH community participation process. Texas Rio Grande Legal Aid represented the residents of the north side in this complaint and continues to be an active advocate for residents as the mitigation agreement is implemented. Additionally, Texas Low Income Housing Information Service was involved in supporting the residents of the north side and provided data and information for this AFH regarding the civil rights and environmental justice issues related to the Harbor Bridge Project. A short documentary on fair housing and environmental justice in Corpus Christi can be found on the Texas Low Income Housing Information Service at the following link: <https://texashousers.net/reports/corpuschristi/>.

Advocates involved with the north side legal dispute believe that the city could improve communication with residents by more thoroughly incorporating resident beliefs and needs into neighborhood planning efforts. Stakeholders believe the city continues to neglect the needs of north side residents who plan to stay in the neighborhood rather than relocating. A stakeholder pointed out that the resettlement assistance from TxDOT is voluntary and stakeholders believe the city has made little effort to collaborate with residents who will stay in the neighborhood to improve conditions in the neighborhood.

Further exacerbating issues on the north side, stakeholders discussed the demolition of D.N. Leathers, the public housing facility in the Hillcrest neighborhood in 2017. The Corpus Christi Housing Authority (CCHA) provided tenant-based vouchers for relocation and mobility counseling to residents who were displaced, some residents believed that the assistance was not adequate. For example, they received an outdated list of apartments accepting vouchers.

SHORTAGE OF AFFORDABLE HOUSING. Stakeholders agree that Corpus Christi has a shortage of affordable housing for both renters and homebuyers. Stakeholders noted that affordable housing is concentrated on the north side of Corpus Christi, an area that has a higher concentration of African American residents than the rest of the city and on the west side of Corpus Christi, an

area with a higher concentration of low-income Latino/Hispanic residents who are more likely to be first or second-generation Americans or speak primarily Spanish. Affordable housing is not thought to be available on the south side or on the portion of North Padre Island in City Council District 4.

Stakeholders agree that Corpus Christi lacks affordable housing options for extremely low-income residents. The CCHA has a waiting list of over 1,000 people. Stakeholders discussed that a gap exists between what is being built as affordable housing and the need in the community for deeply affordable housing, especially for families at 30 percent of median family income and below. Stakeholders suggested that affordable housing needs to be a part of the city's planning efforts, and some suggest that a committee should be created by the city council that includes stakeholders, residents, and employers to address this issue.

Stakeholders noted the lack of planning staff at the city to help address affordable housing needs. According to staff in the planning division of the City of Corpus Christi, the city eliminated the planning division four years ago and recently reestablished it in February 2017. In late 2016, the city completed a comprehensive plan, *Plan CC*, through the year 2035, which was the first updated plan since the 1980s. *Plan CC's* vision for housing and neighborhoods includes affordable housing for all income levels. A goal of the plan is to: "support exploration of local nonprofit Community Development Corporations, which can assist in revitalizing neighborhoods through affordable housing and commercial development, job creation initiatives, neighborhood planning, and advocacy."¹ In an effort to address affordable housing and access to opportunities, the planning division will be developing area development plans in nine neighborhoods which are listed in *Plan CC*.

Residents in focus groups who do not own their home said that it is difficult to find affordable housing in Corpus Christi. They discussed the long wait lists for public housing and lack of other options. Residents also discussed confusion with public housing rules and other affordable housing options and frustration when they are looking for an apartment with landlords who do not call them back. Some residents noted that it is challenging to find affordable housing with a criminal history.

A few residents participating in focus groups said that they were paying over 30 percent of their income on housing, and one was spending over 50 percent of their income on housing. Residents also discussed that it is especially difficult to find affordable housing with multiple bedrooms for larger families. Multiple residents discussed issues of overcrowding. One resident was kicked out of an apartment because they had too many people living in the unit. Other senior residents discussed that they had family members living with them causing overcrowding in their homes.

¹ *Plan CC Comprehensive Plan*. PDF. Web. http://docs.wixstatic.com/ugd/c701b0_9e69fd3ad1b148428fb9e2e17040f015.pdf. Accessed September 27, 2017.

The City of Corpus Christi has a fund, called the Type A Fund, which receives one-eighth of a cent of sales tax designated for economic and job growth. Decisions about distributing Type A Funds are made by the Type A Board, who are appointed by city council. Several stakeholders noted that this fund includes the Homebuyer Assistance Program, which provides eligible homebuyers up to \$10,000 for down payment assistance. Properties purchased using Type A funds may not exceed a sales price of \$166,000. The Type A Fund has \$500,000 to distribute on an annual basis, which goes toward the homebuyer assistance program as well as administrative costs. Last year approximately \$350,000 was distributed as homebuyer assistance and \$50,000 for administrative costs. Additionally, for the past two years a portion of the Type A Fund was given to the CCHA to rehabilitate one of their public housing complexes and bring seven previously unusable units back into the market. A total of \$400,000 was given to the CCHA for this purpose. Stakeholders discussed this program as a strength in the community for providing opportunities for single family homeownership among low-income residents.

COMMUNITY OPPOSITION TO AFFORDABLE HOUSING IN CERTAIN NEIGHBORHOODS. Stakeholders discussed that a barrier to building affordable housing in Corpus Christi is community opposition to affordable housing in certain neighborhoods. Stakeholders agree that community opposition exists to building affordable housing units in the Calallen area in the northwest and on the south side of Corpus Christi.

Stakeholders noted that the community lacks knowledge about what affordable housing is and how it can be good for all neighborhoods. They noted that officials are not doing a good job of educating communities on the benefits of affordable housing before trying to launch a project, and thus affordable housing keeps getting pushed out of neighborhoods. Specifically, stakeholders noted that many people don't understand tax credit properties. This group of stakeholders believe that the community opposition continues trends of segregation in Corpus Christi.

VOUCHER USE. Stakeholders do not believe that everyone in Corpus Christi can live where they want. Stakeholders noted that residents using public housing vouchers are frequently turned down for rentals because landlords do not accept vouchers as a form of payment. When D.N. Leathers was recently demolished, residents were given tenant-based vouchers. Stakeholders discussed that residents experienced difficulty finding apartments that would accept vouchers, especially on the south side. Stakeholders noted that parents who were displaced when D.N. Leathers was demolished are having to withdraw their children from their current school because they cannot find a place to live nearby.

The project-based affordable housing on Ayers street on the west side of Corpus Christi, including La Armada I, La Armada II, and Clairelaine Gardens, will also be transitioning to tenant-based vouchers in the future which will increase the number of Corpus Christi residents attempting to

use vouchers as a form of payment outside of the currently concentrated areas of affordable housing on the west and north sides of the city. Stakeholders who work with persons with disabilities noted that these individuals receive vouchers through the Texas Department of Housing and Community Affairs, and they experience similar issues with private landlords not accepting their vouchers.

Stakeholders believe that private landlords not accepting vouchers continues patterns of racial segregation in the city. Some states and municipalities in other states have passed laws prohibiting landlords from denying vouchers, considering it discrimination based on source of income; however, Texas state law currently prohibits local jurisdictions from passing such protections.

UNEVENLY DISTRIBUTED PUBLIC SERVICES AND AMENITIES. Stakeholders agree that many people want to live on the south side of Corpus Christi for the good schools, but many jobs are concentrated where the refineries are, north and northwest. Stakeholders agree that although public transportation is available in the city, it would be difficult for someone who relied on public transportation to live on the south side and travel to the refineries for work due to the amount of time it would take.

Neighborhoods that have higher incomes and access to better schools such as the south side and the Calallen area generally have less access to public transportation in Corpus Christi, limiting the ability of a low-income or disabled person who relies on public transportation to live in those areas. Stakeholders noted that the Flour Bluff area has a homeless community that has trouble getting to services downtown due to lack of transportation in the area.

Stakeholders noted that there are good libraries with public computers and active senior centers in Corpus Christi; however, they worry that these public services are vulnerable to funding reductions. They mentioned that in recent years many public pools have reduced hours or closed, and community policing efforts have been eliminated, which were assets to the community.

ENVIRONMENTAL CONCERNS. Corpus Christi is an area with heavy industry, including refineries and chemical plants. Stakeholders agreed that the industry, which is primarily along Interstate 37 outside the city to the north just south of Nueces Bay, disproportionately affects neighborhoods in close proximity. Stakeholders noted that these neighborhoods have issues with decreased property value and health concerns related to air and soil quality. Many of the neighborhoods that have industry nearby are also low-income communities with high concentrations of minority residents, including neighborhoods on the north side and west side of the city. The Harbor Bridge project, which will replace the current harbor bridge, was also commonly discussed as it will cut through the Hillcrest and Washington Coles neighborhoods on the north side of Corpus Christi,

displacing some residents and increasing exposure to freeway pollution for those who remain in the neighborhoods.

LACK OF ACCESSIBLE HOUSING. Stakeholders believe that Corpus Christi has a lack of accessible housing for residents with disabilities. According to these stakeholders, Corpus Christi has an older population, and residents are aging into disabilities. Once someone is placed in an accessible unit in public housing, they typically stay for a very long time, and it is difficult to find open units for people transitioning out of institutions or others needing an accessible unit. Advocates for individuals with disabilities believe that the city does not prioritize the needs of disabled residents in planning efforts. Stakeholders report that the CCHA has 91 accessible units and is currently the only source of permanent housing for residents with disabilities. The City of Corpus Christi, through its HOME Investment Partnership Program (HOME), has partially or fully funded projects which have generated 214 new permanent affordable and accessible units as well as 60 rehabilitated affordable and accessible units in Corpus Christi.

The highest volume of fair housing complaints in Corpus Christi is regarding modifications for persons with disabilities. Individuals who age into a disability experience difficulty requesting modifications through private landlords. Additionally, some of the public housing facilities are out of date and need modifications to comply with the Americans with Disabilities Act (ADA) regulations.

Advocates discussed that building affordable housing in surrounding rural areas does not benefit individuals with disabilities who rely on public transportation and need affordable housing within the city where transportation is accessible. The B-line is a paratransit service that provides door-to-door transportation services for people with disabilities who qualify for service; however, advocates for individuals with disabilities noted that it can be inconvenient because service has to be scheduled three days in advance; according to the B-Line, no exceptions are granted.

LACK OF ASSISTANCE FOR HOME MODIFICATIONS AND MAINTENANCE. Senior residents noted difficulty getting assistance to install modifications to their homes such as shower grab bars, raised toilet seats, and converting the bathtub to a standing shower. Many seniors said that they rely on their children to help them install modifications. When asked if they knew whom to call if they could not rely on a family member, most residents said they would not know whom to call.

Seniors discussed that it is difficult to find affordable services for other home maintenance issues such as lawn service, pest control, plumbing, and weatherization. Homeowners noted that in order to keep up with city codes they have to arrange for trees to be trimmed, but it is difficult to find an affordable service. A representative from the Human Relations Department, who takes fair housing calls in Corpus Christi, said they receive a lot of calls from people needing assistance with home maintenance and modifications and refer them to other organizations.

LACK OF HOUSING AND RESOURCES FOR THE INDIVIDUALS AND FAMILIES EXPERIENCING HOMELESSNESS.

Stakeholders noted that Corpus Christi is lacking housing options for individuals and families experiencing homelessness. Stakeholders who work in shelters noted gaps in services. For example, in the women’s shelter, boys over the age of 13 are not allowed, and in the men’s shelter, individuals with severe mental illness are sometimes barred from facilities due to behavior that is seen as dangerous. Stakeholders discussed the need for supportive housing options for the homeless population who experience severe mental illness.

INVESTMENT IN EXISTING NEIGHBORHOODS. Stakeholders noted that many dilapidated homes exist in Corpus Christi. Some stakeholders believe that code enforcement should address the number of blighted homes, however others thought that stricter code enforcement could force low-income homeowners out of their home because they are unable to afford the required maintenance. Stakeholders noted that rather than improve existing housing stock, development is occurring in new areas of the city, including the south side and some on the west side. Stakeholders also said that existing infrastructure in the city, such as roads and water facilities, are old and not well maintained. When asked about underdeveloped areas, some stakeholders noted that rural areas, including the many colonias² near the city and other areas outside the city limits, are not connected to sewer and wastewater which is a barrier to development and an added cost for developers.

Some stakeholders noted that many older homes in Corpus Christi have title issues, preventing redevelopment. An example provided by a stakeholder that often occurs in Corpus Christi is a family who has been in a home for generations but the current residents do not own the title, nor do they know where the correct heir is. Stakeholders suggested a land trust is needed to clear titles in order to rebuild on existing lots.

Stakeholders discussed infill, building within the city in communities that already exist, rather than continuing to grow out. Infill helps to keep residents close to amenities such as existing transportation networks, schools, and grocery stores. Stakeholders noted zoning changes are needed to allow for multiple units to be built on single-family lots in residential neighborhoods but generally believe that the city was receptive and easy to work with on changing zoning rules.

LANGUAGE BARRIERS. Stakeholders discussed language barriers for Spanish and Asian languages. Although some stakeholders believe that Corpus Christi has enough Spanish speaking realtors, others believe that there are not enough. A Spanish speaking realtor in one of the focus groups noted that four or five Spanish speakers work in their office of 200 realtors, which is a small number considering the number of Corpus Christi residents who speak primarily Spanish.

² Colonias are defined by the Texas Secretary of State as residential areas along the Texas-Mexico border that may lack basic living necessities such as water and sewer systems, electricity, roads, and safe housing. *What is a Colonia*. Texas Secretary of State Rolando Pablos. Web. https://www.sos.state.tx.us/border/colonias/what_colonia.shtml. Accessed September 21, 2017.

Stakeholders believe realtors who speak Asian languages are lacking in Corpus Christi and discussed the recent influx of Asian residents due to international industry partnerships in the area.

FAIR HOUSING PUBLIC MEETING

A public meeting was held at 5:30pm on Thursday August 10, 2017 at the Salvation Army Community Center, a separate location from the shelter. Eleven participants attended the event. The event included a presentation on the definition and history of fair housing and the demographics of Corpus Christi relevant to fair housing issues along with three activities to obtain community input: A dot activity to identify protected classes who experience discrimination; a map activity to identify areas with limited access to good schools, jobs, transportation, and affordable housing; and a prioritization worksheet.

DOT ACTIVITY. The dot activity displayed the protected classes from The Fair Housing Act and asked participants to place a dot sticker on the groups of people most affected by fair housing issues. The responses are shown in the table below.

Table III-3 Protected Classes Who are Most Affected by Fair Housing Issues in Corpus Christi

Population Group	Number of Dots
Race	11
Hispanic/Latino	3
African American/Black	2
Asian Indian	1
Native Hawaiian/Pacific Islander	1
American Indian/Native American	1
White	1
Multiracial	1
Other	0
Disability	5
National Origin	3
Families with Children	2
Sex	1
Male	0
Female	0
LGBTQ	1
Religion	1
Other	1

Participants were invited to share additional written thoughts about housing discrimination. Seven comments were received. Two were related to individuals and families of foreign national

origin who cannot qualify for home mortgages and do not apply for affordable housing because they will not be accepted. Three were related to individuals with disabilities, one indicating that many properties do not have bathrooms that meet ADA standards, another indicating that the degree of a person's disability is not considered for housing needs, and one stated that age discrimination occurs in Corpus Christi. The last two comments related to family safety, noting that Corpus Christi neighborhoods are not always safe and well-lit.

MAP ACTIVITY. Two large maps of Corpus Christi were displayed at the map station. The maps displayed the City of Corpus Christi and the boundaries of each of the five city council districts. On one map, participants were asked to identify areas that do not have access to good schools, jobs, or transportation using different colored push pins. On the second map, participants were asked to put one color pin in areas where affordable housing exists and another color where it should exist. The results of both map activities are described below.

MAP 1: SCHOOLS, JOBS, AND PUBLIC TRANSPORTATION. City Council District 3, on the west side of Corpus Christi in, just east of Corpus Christi International Airport and south of Texas Highway 44 received the most pins. This area of the map showed a lack of access to good schools (three pins) as well as a lack of access to good jobs (three pins). Slightly further south in District 3 south of Brownsville Road, an additional pin indicated a lack of access to good schools and a pin indicated a lack of access to public transportation.

District 1 had the second highest concentration of pins in the activity. South of Leopard Street and east of Rand Morgan Street on the west side of Corpus Christi, one pin indicated lack of access to good schools and one pin indicated lack of access to public transportation in the area. Additionally, in the Hillcrest neighborhood north of Interstate 37, a pin indicated lack of access to good schools. Although District 1 had the second highest concentration of pins, no pins were placed in the far northwest corner of this district in the Calallen neighborhood.

In District 4, one pin indicated a lack of access to good jobs in the Flour Bluff area and one pin indicated lack of access to public transportation on the portion of North Padre Island located within this district.

Stakeholders did not place any pins in Districts 2 or 5.

Although this AFH focuses on the City of Corpus Christi, some participants placed pins outside of the city limits. Participants indicated lack of access to public transportation in Petronila and Chapman Ranch, south of Corpus Christi, and north across the bay bridge into Portland. Participants also indicated a lack of good jobs in Petronila and Chapman Ranch. Robstown, west of the City of Corpus Christi, received two pins indicating a lack of access to good jobs and one pin indicating lack of access to good schools.

MAP 2: AFFORDABLE HOUSING. Eight pins were placed in areas in Corpus Christi that have affordable housing and 12 were placed for areas that should have affordable housing. One pin outside of the city indicated affordable housing is available just west of the city toward Robstown.

According to participants in this activity, District 3 has the most affordable housing (three pins), however it also had the most pins indicating it should have more affordable housing (seven pins). Affordable housing was identified in the south of District 3 near Ayers Street and South Padre Island Drive and just east of the Corpus Christi International Airport. The seven pins indicating District 3 should have more affordable housing were spread throughout the district. Affordable housing was identified in District 4 (two pins) near Rodd Field Road and in the Flour Bluff neighborhood, however the district was also identified as needing more affordable housing (three pins). Districts 1, 2, and 4 each had one pin indicating that affordable housing exists in the area, and of those three, District 1 had two pins indicating more affordable housing is needed in the area - one on the west side and one close to downtown.

PRIORITIZATION WORKSHEET. Participants in each focus group and the public meeting were asked to prioritize what they believe are the most significant fair housing issues in Corpus Christi as well as the area of the city affected by each issue. Below is a table of responses in order of frequency.

Table III-4 Prioritization of Fair Housing Issues

Issue	Frequency	Area
Affordable housing issues	24	City-wide
Lack of accessible housing	14	District 4
Amenities that are not equally distributed throughout the city	11	District 1, 2, 4, 5
Income discrimination/not taking vouchers	7	District 1
Community opposition	5	District 1, 4
Lack of private and public investment or lack of community involvement	5	City-wide
Segregation	4	No location identified
Lack of knowledge or education	3	District 1, 5
Denials due to criminal background check	3	No location identified
Lack of community revitalization strategies	3	No location identified
Displacement of residents due to economic pressures	3	District 3, 5
Discrimination based on family size	2	No location identified
Lack of financial services and education	2	No location identified
Discrimination based on sex	2	No location identified
Discrimination based on race	2	District 5
Private discrimination	2	No location identified
Homelessness	2	District 4, north side
Lack of regional cooperation	2	District 2
Denials due to bad credit	1	No location identified
Lack of income	1	No location identified

Issue	Frequency	Area
Discrimination based on national origin	1	No location identified
Discrimination against younger people	1	District 5
Land use and zoning	1	District 2
Low paying jobs	1	District 1
Discrimination based on sexual orientation	1	District 2

PUBLIC HEARING

A public hearing was held on October 10, 2017, at 5:30 pm. The notice for the public hearing indicated that anyone who needed accommodation should call the City Housing and Community Development Department (HCD) 24 hours prior to the meeting. A phone number to make such a request was included in the notice. One person appeared at the hearing and the comments made and the response from the city are included in the Appendix to this report. A Spanish-speaker was available at the meeting to translate if needed.

RESIDENT FAIR HOUSING SURVEY

The Corpus Christi Assessment of Fair Housing survey was available online and in paper formats in both English and Spanish. The survey was open for responses online between July 13, 2017 and August 18, 2017. Of the 236 responses received, 232 completed the survey online and 4 completed and returned the paper version. The City Manager announced the survey twice during city manager updates to city council. The city also sent multiple electronic notifications through an employee newsletter and emails to community partners. Stakeholders were asked to distribute the survey and send regular reminders to their clients and contacts. The following sections provide a detailed analysis of the survey results.

DEMOGRAPHICS

All respondents completed the survey in English. Of the 189 respondents who indicated their race or ethnicity, 46.6 percent identify as White/Caucasian, 46.0 percent identify as Hispanic, and 7.9 percent chose not to answer. A majority (73.7 percent) of respondents identify as female. Most survey respondents (60.9 percent) were between 36 and 64 years old.

Table III-5 shows the educational attainment of respondents. Approximately 42.9 percent have a bachelor’s degree or higher, 37.0 percent have some college or an associate’s degree, 14.8 percent have a high school diploma, and 5.3 percent have less than a high school diploma.

Table III-5 Educational Attainment of Respondents

Highest Educational Attainment	Percent of Respondents
Less than high school diploma	5.3%
High school diploma	14.8%
Some college or associate’s degree	37.0%
Bachelor’s degree or higher	42.9%

Table III-6 shows the household income distribution of respondents.

Table III-6 Income Distribution of Respondents

Household Income	Percent of Respondents
Less than \$15,000	10.8%
Between \$15,000 and \$25,000	13.5%
Between \$25,000 and \$40,000	16.2%
Between \$40,000 and \$50,000	7.6%
Between \$50,000 and \$65,000	16.2%
Between \$65,000 and \$80,000	11.9%
Between \$80,000 and \$100,000	12.4%
More than \$100,000	11.4%

About 65.2 percent of respondents are employed full time, 7.5 percent are employed part time, 22.5 percent are unemployed, and 4.8 percent are full-time students.

CURRENT HOUSING. Most respondents report living in ZIP codes 78404 (City Council Districts 2 and 4), 78410 (City Council District 1), 78413 (City Council Districts 3 and 5), and 78418 (City Council District 4). On average, respondents have lived in Corpus Christi for approximately 24 years. Most respondents have lived at their current residence from 1 to 16 years. Most respondents are satisfied with their current housing situation, with a respondent satisfaction average of 3.3 on a scale of 1 to 5.

About one-third of respondents report they are not happy in their current neighborhood. Many cite financial affordability as a major reason. Many respondents (40 percent) report that they would move to a different neighborhood, citing desires such as paying less for housing, moving to a bigger place, moving to a safer or quieter area, and gaining better roads and living conditions. As one respondent writes, “Roads and sidewalks are deteriorated and we can't even use sidewalks to go for a walk. Some homes are abandoned and allowed to sit empty.” Other

respondents write, “I want to get away from the refinery and all the noise of the freeway”, and “On my side of town people are neglectful of their properties and the city seems not to care as much as it does for the south side of town.”

Most respondents (82.5 percent) have at least one child under age 18 in their household, and the average household has three people (including the respondent). Close to half of the respondents (45.8 percent) say their home has three bedrooms; 18.4 percent have more than three bedrooms; 27.4 percent have two bedrooms; and 8.4 percent have one bedroom.

Most respondents (74.9 percent) believe that their current neighborhood is not affected by air pollution.

HOMEOWNERS. Nearly half (47.9 percent) of respondents say they live in a house or condo that they own. Of a total of 95 respondents, 91 say they have access to a public sewer, 45 have access to gas, 6 have access to septic systems, and all of them say they have electricity, indoor running water, hot water, and a working bathroom in their house or condo. Most owners say that their house is between 30 and 50 years old. A majority of homeowners (74.7 percent) indicate that they are able to keep up with the maintenance on their house, with 10.5 percent indicating they are somewhat able to keep up. Most respondents are satisfied with their mortgage rate, with a respondent satisfaction average of 3.5 on a scale of 1 to 5.

RENTERS. About one-third of respondents (34.1 percent) say that they live in a house or apartment that they rent. Of a total of 77 renters, 66 say they have access to air-conditioning and heat, 64 say they have access to a public sewer, 28 have access to gas, 10 have access to septic systems, and most of them say they have electricity, indoor running water, hot water, and a working bathroom in their rental. On average, these renters have been living in their current location for about four years. The most common reasons for not buying a house are not having enough money for a down payment and not having good credit, although some respondents pointed out that they were in the process of buying a house. When asked how satisfied they are with the cost of their rent on a scale of 1 to 5, respondents give an average rating of 2.7.

OTHER LIVING ARRANGEMENTS. Of the remaining 38 respondents, 5 respondents say they live with friends or relatives and do not pay rent, 11 live with others and help with household expenses, 10 live in publicly supported housing, 1 lives in a temporary shelter, 2 are currently homeless, and 9 respondents listed other living arrangements.

COST BURDEN. Just over half of residents (54.7 percent) indicate that they are experiencing cost burden, which is defined as spending more than 30 percent of their monthly household income on housing, and 31.2 percent indicate that they are severely cost burdened, spending more than 50 percent of their household income on housing.

ACCESS TO OPPORTUNITIES. Most residents (74.3 percent) believe that they have access to good schools in their neighborhood, and 70.1 percent believe they have adequate access to transportation. Just over half of residents (57.2 percent) believe they have access to good jobs. Approximately 32.2 percent indicate that they would use public transportation if it were available and another 32.2 percent indicate they might use it.

ACCESSIBILITY. Regarding accessibility, 11.0 percent of respondents have someone with one or more disabilities living in their home, and 9.0 percent have at least one person over age 65 living in their home. Few respondents (8.2 percent) indicate that their residences have been modified for a disability. Some respondents paid for these modifications through a personal loan while others say that their apartments came with accessibility modifications. Most respondents (56.3 percent) report modified toilet seats in their residences; others say handicap showers are installed. Some residents (12.3 percent) say that they need accessibility modifications, specifying the need for widened doorways, modified bathrooms, and wheelchair ramps. Few respondents (24.9 percent) know how to request modifications to their residence for a disability. Most residents (54.4 percent) describe the public areas and facilities in Corpus Christi as “somewhat accessible” and 16.6 percent describe them as “very accessible”.

DISCRIMINATION. Out of 190 respondents to questions about discrimination, 17.4 percent indicate that they have been turned down for a mortgage. A majority (67.7 percent) believe that they were turned down because their credit score was too low. Seven residents believe their mortgage application was turned down for discriminatory reasons on the basis of familial status (having children), religion, race, or sex. Nine respondents described low income, credit score, and physical appearance as reasons why their mortgage application was turned down. Fifteen residents say their real estate agent did not show them all of the places they were interested in when looking for a house or condo to buy.

Similarly, of the nine percent of residents who have experienced a rental application rejection, more than half believe it was because of their low credit score, although some say it could be because of a weak rental history or criminal record. Twelve residents believe their rental applications were turned down for discriminatory reasons, on the basis of familial status, disability, race, or color. Others believe it was because of ethnicity. As one respondent writes, “When I called and used my Spanish surname I was told there were no units, 5 minutes later, using my Anglo maiden name, I was offered the apartment.”

Out of 192 respondents, nine explicitly say that they have been discriminated against regarding access to housing, based on familial status, disability, race/ethnicity, or color. Another respondent reports having been turned down because they were previously homeless.

FAIR HOUSING OUTREACH AND EDUCATION. Most respondents (47.9 percent) say they do not know how to file a housing complaint, and many (44.8 percent) say they do not know who to talk to if they believe they have been discriminated against while looking for housing. Of the 190 residents who responded, about one-third (33.2 percent) say they do not trust that a housing complaint would be addressed if they were to file one.

COMMUNITY PARTICIPATION LIMITATIONS

Outreach was intended to engage broad participation among protected class groups, however demographic information was not collected from participants in interviews and focus groups. The city engaged in a robust outreach effort to include residents and stakeholders of many protected classes including race, color, national origin, sex, disability, religion, and family status. Members of the African American community living on the north side participated in this AFH; however, considering recent fair housing history in the city, more targeted outreach to this community could have yielded higher participation. Additionally, participation of primarily Spanish speaking low-income Hispanic residents was lower than expected given the large Hispanic population in Corpus Christi.

In the future, several steps can be taken to improve community participation in the AFH:

1. Plan for a more robust communication effort from the city to the community, including wider and more frequent publication of announcements of meetings, particularly in Spanish-language print publications. Consider using public service announcements on radio and television media outlets, including those that serve Spanish-speaking audiences.
2. More targeted outreach to members of protected classes through neighborhood associations, churches, and community organizations to increase participation among members of protected classes, particularly individuals with disabilities.
3. As funds allow, consider expanding the number of focus groups and locate the focus groups in additional areas of the community to reach populations historically impacted by segregation or experiencing other fair housing problems.
4. As funds allow, consider translating the AFH into Spanish for review during the public comment period.

PUBLIC COMMENTS

The AFH was available for public comment between October 18, 2017 and November 20, 2017. Comments were received during this period as well as during the public hearing on October 10, 2017. The comments received are summarized in a table in the Appendix to this report. The table indicates which comments were accepted and which were rejected.

VI. Assessment of Past Goals and Actions

IV. ASSESSMENT OF PAST GOALS AND ACTIONS

a) Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

The City of Corpus Christi adopted 15 fair housing recommendations in its 2012 Analysis of Impediments to Fair Housing Choice (AI). Housing and community development goals set in the 2013- 2017 Consolidated Plan (ConPlan) and 2016 – 2017 Annual Action Plan are also relevant to fair housing in Corpus Christi.

b) Discuss what progress has been made toward their achievement

Overall, fair housing and community development goals set by the City of Corpus Christi have primarily focused on expanding the stock of affordable housing available in the city. Significant progress has been made toward achieving these goals. Since 2012, the city has used HOME Investment Partnership Program funds to support new construction of 206 affordable multi-family units and the reconstruction of 495 affordable multi-family units. The city has also created the Veteran’s Minor Home Repair and Appliance Replacement Programs and continues to partner with lenders and builders in the community to provide down payment and cost assistance.

c) Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences)

Since 2012, the City of Corpus Christi, through the Housing and Community Development Department, has been successful in providing HOME funding and support to multi-family projects for both new construction and demolition/reconstruction. However, as overall funding has decreased, efforts have decreased each year. In particular, the city has been unable to implement an Affirmative Fair Housing Marketing Plan (AFMHP) due to funding cuts and a shift in priorities at the local government level. An AFMHP is a marketing strategy to help applicants (owners/agents) who participate in Federal Housing Agency subsidized and unsubsidized multi-family housing programs offer equal housing opportunities regardless of race, color, national origin, religion, sex, familial status, or disability to individuals of both minority and non-minority groups. Implementing an AMFMP would help create fair and open access to affordable housing and a centralized program for self-help initiatives.

d) Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced

The greatest obstacle to achieving fair housing and community development goals in Corpus Christi has been the availability of funds. Possible means for addressing this challenge include

leveraging existing funds through public-private partnerships and expanding collaboration among public, private, and non-profit organizations to better understand and prioritize the needs of the community.

e) Discuss how the experience of program participants with past goals has influenced the selection of current goals.

The experience gained through implementing the fair housing and community development goals described below has allowed the city to re-evaluate each goal and make necessary adjustments to better meet the needs of the community. Focus will remain on expanding the affordable housing stock; however, goals adopted for this Assessment of Fair Housing also place emphasis on housing mobility, access to public services and amenities, accessible housing, neighborhood revitalization, and resident involvement.

The city adopted the following goals and recommendations in the most recent AI, ConPlan, and Annual Action Plan for the City of Corpus Christi. Each contains a summary of the progress made toward achieving these goals.

2012 AI RECOMMENDATIONS

An update on each of the recommendations submitted to HUD by the City of Corpus Christi in 2012 is provided below.

- 1. The city should support the increased production of affordable housing through public private partnerships with developers and capacity building for nonprofits.** The City of Corpus Christi, through the Housing and Community Development Department (HCD), has partnered with a nonprofit organization to demolish two apartment complexes that no longer meet minimum property standards and replace them with 247 Energy Star units for low- and very low-income families. These units will be energy efficient and lead to lower energy costs for these families. HCD has also partnered with a developer to invest in a new 60-unit apartment complex for low- and very low-income families.
- 2. The city should facilitate access to below market-rate units.** According to the 2012 AI remedial actions, the city will facilitate communication between special needs service providers and affordable housing developers to ensure that home seekers with special needs have access to below market-rate units. The city will also partner with developers and nonprofit organizations to reduce the obstacles faced by persons with limited English proficiency, persons with disabilities, and elderly people in submitting applications for below market-rate units. The city continues to partner with nonprofit organizations and developers to provide access to below market-rate units for low- and very low-income families.

3. **The city should maintain a list of partner lenders.** The City of Corpus Christi maintains a list of partner lenders including Nations Reliable Lending, Wells Fargo Mortgage, First Community Bank, New American Funding, Caliber Home Loans, Kleberg Bank, American Bank, Extraco Mortgage, First Community Mortgage, and Prosperity Bank. Through these partner lenders, buyers can access below market-rate loans and locally sponsored down payment and mortgage assistance programs.
4. **The city should identify and seek additional sources of funds for affordable housing.** The City of Corpus Christi maintains a Type A Fund, financed by a one-eighth cent sales tax and designated for economic development and job growth. This fund helps affordable housing programs provide low- to moderate-income residents with down payment and closing costs assistance.
5. **The city should encourage private sector support for affordable housing initiatives.** Through its AI remedial goals, the city encourages major employers and lenders to consider Employer-Assisted Housing (EAH) programs to provide greater access to fair housing for their employees. Benefits such as grants, forgivable loans, deferred or repayable loans, matched savings, and home buyer education help encourage affordable housing development and homeownership.
6. **The city should increase fair housing education and outreach.** The City of Corpus Christi, through the Human Relations Division, assists residents with fair housing education and outreach. The Human Relations Division holds several annual training functions to address issues related to fair housing and access for people with disabilities. In addition, the department conducts fair housing outreach through community-based events.
7. **The city should target outreach and training toward housing industry organizations and general public.** The City of Corpus Christi, through the Human Relations Division, carries out its mission to conduct and enforce a positive program of non-discrimination within the City of Corpus Christi. The department provides regular reports and recommendations to the City Council and others for the improvement of relationships within and among the diverse communities of Corpus Christi. As shown in Table III-2 in the Community Participation section of this report, in the last year the Human Relations Department has attended eight events for outreach to the general public and has led trainings for employees of the Corpus Christi Apartment Association and Prospera, a nonprofit developer of affordable housing.
8. **The city should encourage fair housing enforcement agencies to target increase fair housing testing for multi-family properties.** The City of Corpus Christi and Human Relations Department do not conduct fair housing testing.

9. **The city should apply for competitive and Non-Entitlement State and Federal funding and assistance from nonprofit intermediaries.** The City of Corpus Christi continues to fund the Homebuyer Down Payment Assistance Program through its Type A Fund. The city also continues to search for additional funding resources to advance fair housing objectives.
10. **The city should encourage bank and traditional lenders to offer products addressing the needs of households currently utilizing predatory lenders.** The City of Corpus Christi encourages lending institutions to provide greater outreach to low-income and minority households through the use of “fresh start programs”. These programs enable residents with past financial deficiencies to reestablish their checking, saving, and credit accounts. The city also encourages appraisal industry representatives to perform comparability studies that reflect realistic values of homes built in low-income areas.
11. **The city should provide language assistance to persons with limited English proficiency.** The City of Corpus Christi continues to provide language assistance to persons with limited English proficiency. All city brochures and documents are available in Spanish and other languages upon request.
12. **The city should continue to implement an Affirmative Fair Housing Marketing Plan (AFHMP) to create fair and open access to affordable housing.** The City of Corpus Christi has not implemented an Affirmative Fair Housing Marketing Plan. Implementing an AMFMP would help create fair and open access to affordable housing and a centralized program for self-help initiatives
13. **The city should continue to encourage recruitment of industry and job creation.** The City of Corpus Christi continues to participate in plans that support economic development. *Plan CC*, Corpus Christi’s Comprehensive Plan is one such plan that creates a 20-year policy and strategic framework for the city. A new Downtown Revitalization Plan is scheduled for review by the City Council for approval.
14. **The city should design and implement a centralized program of self-help initiatives.** The City of Corpus Christi chose not to pursue this program due to funding cuts.

V. Fair Housing Analysis

V.A. DEMOGRAPHIC SUMMARY

a) Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

U.S. Department of Housing and Urban Development (HUD) Table 1 shows the demographics of Corpus Christi based on the most recent data for the city. A majority (59.7 percent) of the Corpus Christi population is Hispanic, although Non-Hispanic White residents make up approximately one-third of the population. Black residents make up 3.9 percent of the population, Asian or Pacific Islander residents make up 1.8 percent of the population, and Native American, multi-racial, or other residents make up 1.3 percent of the population. The City of Corpus Christi has a higher proportion of Hispanic residents compared with the larger Corpus Christi region (Nueces and San Patricio counties).

Corpus Christi residents from outside the United States are predominately from Mexico, and Mexican-American residents make up approximately 5.3 percent of the total Corpus Christi population. Other residents from outside the United States are from Asian countries such as the Philippines, India, Korea, Vietnam, and China; Latin American countries such as El Salvador and Honduras; and European countries such as Germany and England. This is comparable to the national origin of residents in the larger Corpus Christi region, although the city has a higher concentration of foreign-born residents. The most commonly spoken language of Corpus Christi residents with limited English proficiency is Spanish, with 28,859 Spanish-speaking residents representing 10.0 percent of the population. Corpus Christi has more females than males, and residents in the City of Corpus Christi are less likely to have a disability than in the broader Corpus Christi region. The city also has a higher proportion of families with children (44.9 percent) and residents aged 18-64 years (62.3 percent) than the region as a whole.

Each of the HUD tables and maps in this report are numbered according to the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

HUD Table 1. Demographics

Race/Ethnicity	Corpus Christi, Texas		Corpus Christi, Texas Region	
	Number	Percent ¹	Number	Percent
White, Non-Hispanic	101,655	33.31%	155,550	36.33%
Black, Non-Hispanic	11,892	3.90%	13,338	3.12%
Hispanic	182,183	59.69%	247,231	57.74%
Asian or Pacific Islander, Non-Hispanic	5,562	1.82%	6,704	1.57%
Native American, Non-Hispanic	799	0.26%	1,169	0.27%
Two or More Races, Non-Hispanic	2,758	0.90%	3,720	0.87%

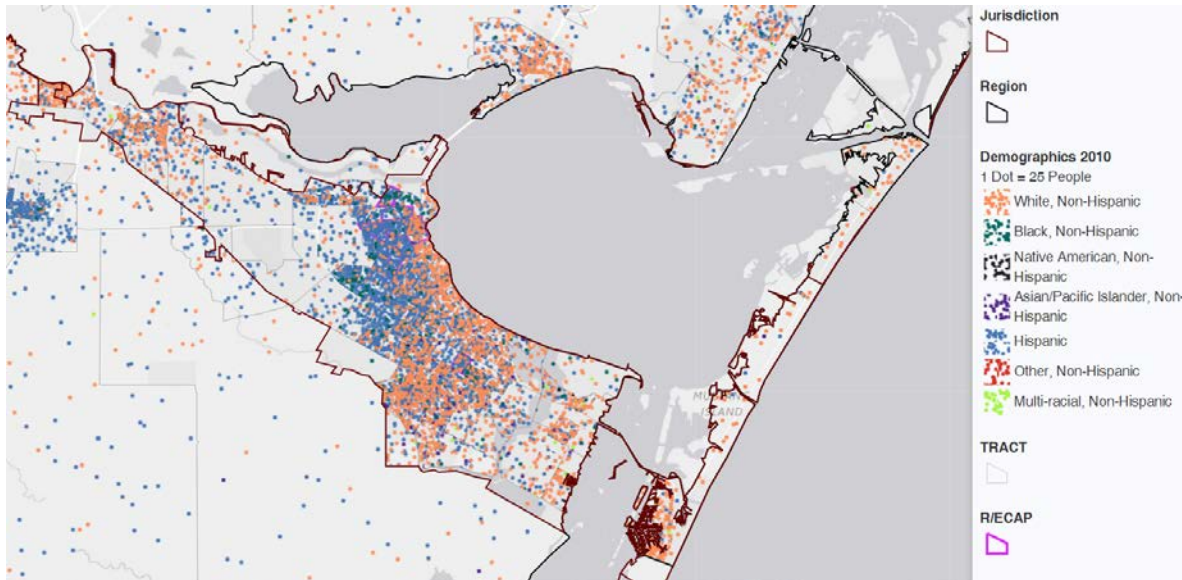
Corpus Christi, Texas				Corpus Christi, Texas Region		
Other, Non-Hispanic		366	0.12%		473	0.11%
National Origin						
#1 country of origin	Mexico	15,247	5.30%	Mexico	19,473	4.83%
#2 country of origin	Philippines	1,499	0.52%	Philippines	1,625	0.40%
#3 country of origin	India	731	0.25%	India	849	0.21%
#4 country of origin	Germany	589	0.20%	Germany	725	0.18%
#5 country of origin	Korea	537	0.19%	Vietnam	582	0.14%
#6 country of origin	El Salvador	460	0.16%	Korea	563	0.14%
#7 country of origin	Vietnam	441	0.15%	Canada	494	0.12%
#8 country of origin	China excl. Hong Kong & Taiwan	315	0.11%	El Salvador	480	0.12%
#9 country of origin	Honduras	311	0.11%	Honduras	383	0.10%
#10 country of origin	England	264	0.09%	China excl. Hong Kong & Taiwan	325	0.08%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Spanish	28,859	10.03%	Spanish	40,449	10.03%
#2 LEP Language	Korean	365	0.13%	Tagalog	389	0.10%
#3 LEP Language	Tagalog	344	0.12%	Vietnamese	387	0.10%
#4 LEP Language	Chinese	302	0.11%	Korean	377	0.09%
#5 LEP Language	Vietnamese	298	0.10%	Chinese	313	0.08%
#6 LEP Language	German	179	0.06%	German	195	0.05%
#7 LEP Language	Gujarati	90	0.03%	Japanese	154	0.04%
#8 LEP Language	Other Asian Language	86	0.03%	Arabic	120	0.03%
#9 LEP Language	Japanese	72	0.03%	Laotian	120	0.03%
#10 LEP Language	Greek	68	0.02%	Thai	106	0.03%
Disability Type						
Hearing difficulty		13,899	4.92%		20,912	5.27%
Vision difficulty		10,222	3.62%		15,370	3.87%
Cognitive difficulty		19,171	6.78%		27,216	6.86%
Ambulatory difficulty		25,883	9.16%		39,062	9.85%
Self-care difficulty		11,913	4.21%		17,408	4.39%
Independent living difficulty		17,164	6.07%		25,457	6.42%
Sex						
Male		149,679	49.04%		210,686	49.20%
Female		155,536	50.96%		217,499	50.80%
Age						
Under 18		78,695	25.78%		111,053	25.94%
18-64		190,165	62.31%		262,256	61.25%
65+		36,354	11.91%		54,876	12.82%
Family Type						
Families with children		34,261	44.89%		47,666	43.83%

Source: U.S. Census Bureau, 2010, as retrieved from the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

¹ All percentages represent the share of the total population within the jurisdiction or region, except family type, which represents the share of total families.

HUD Map 1 displays the location of Corpus Christi residents by race and ethnicity. Most Hispanic residents live on the western half of the city, predominately in the north-central area, and most Non-Hispanic White residents live on the eastern half of the city, predominately in the northeast bay area.

HUD Map 1 Race/Ethnicity



HUD Table 2 shows demographic trends in Corpus Christi and the region from 1990 to 2010. The data indicate that, although the total Corpus Christi population increased only slightly over this period, the city experienced considerable in-migration. This can be seen in HUD Table 2 by an increase in the foreign-born population from 13,617 residents in 1990 to 24,668 residents currently. This has corresponded with an increase in the Hispanic population from 130,213 residents to 182,183 residents. Since 1990, the representation of Hispanic residents in the Corpus Christi population has increased from 50.2 percent to 59.7 percent, partly because the Non-Hispanic White population decreased over the same period.

HUD Table 2. Demographic Trends

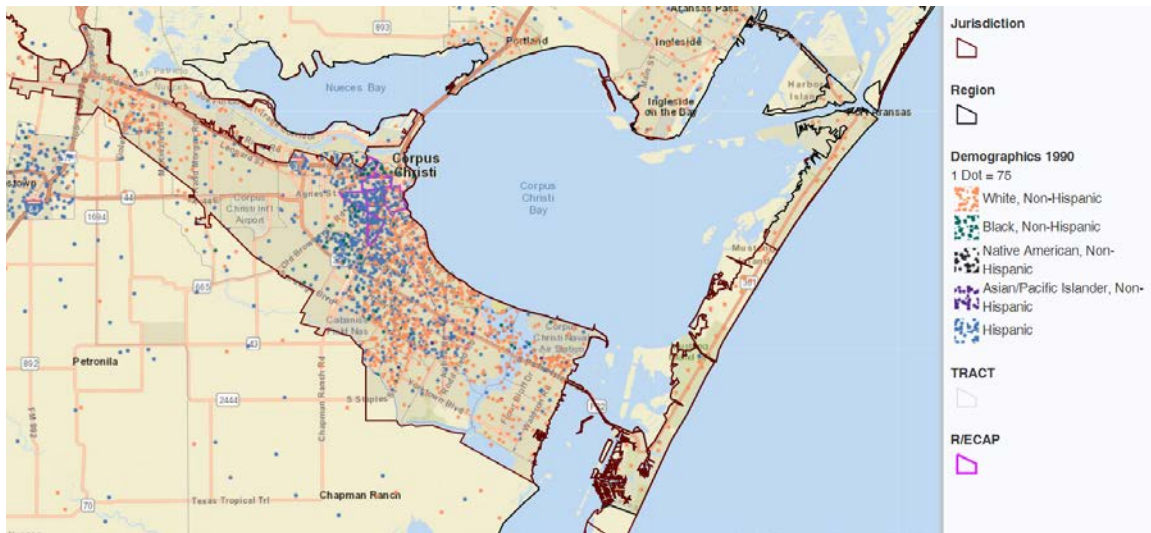
Race/Ethnicity	Corpus Christi, Texas						Corpus Christi, Texas Region					
	1990		2000		2010		1990		2000		2010	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
White, Non-Hispanic	114,355	44.05%	107,631	38.62%	101,655	33.31%	164,631	44.76%	165,492	41.03%	155,550	36.33%
Black, Non-Hispanic	11,619	4.48%	13,031	4.68%	12,858	4.21%	13,047	3.55%	15,637	3.88%	14,581	3.41%
Hispanic	130,213	50.16%	151,150	54.24%	182,183	59.69%	185,394	50.40%	212,674	52.73%	247,231	57.74%
Asian or Pacific Islander, Non-Hispanic	1,970	0.76%	4,190	1.50%	6,499	2.13%	2,695	0.73%	5,557	1.38%	7,876	1.84%
Native American, Non-Hispanic	733	0.28%	1,610	0.58%	1,523	0.50%	999	0.27%	2,480	0.61%	2,300	0.54%
National Origin												
Foreign-born	13,617	5.25%	18,701	6.71%	22,728	7.45%	17,361	4.72%	23,996	5.95%	29,513	6.89%
LEP												
Limited English Proficiency	35,789	13.79%	33,010	11.85%	31,646	10.37%	56,838	15.45%	48,651	12.06%	46,619	10.89%
Sex												
Male	126,637	48.80%	136,346	48.93%	149,679	49.04%	180,255	49.01%	198,300	49.17%	210,686	49.20%
Female	132,886	51.20%	142,311	51.07%	155,536	50.96%	187,512	50.99%	204,980	50.83%	217,499	50.80%
Age												
Under 18	78,126	30.10%	80,688	28.96%	78,695	25.78%	112,064	30.47%	118,748	29.45%	111,053	25.94%
18-64	155,570	59.94%	166,990	59.93%	190,165	62.31%	217,339	59.10%	238,086	59.04%	262,256	61.25%
65+	25,828	9.95%	30,978	11.12%	36,354	11.91%	38,364	10.43%	46,446	11.52%	54,876	12.82%
Family Type												
Families with children	36,251	54.41%	22,307	49.92%	34,261	44.89%	50,925	53.71%	34,600	50.10%	47,666	43.83%

Source: U.S. Census Bureau, 1990-2010, as retrieved from the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

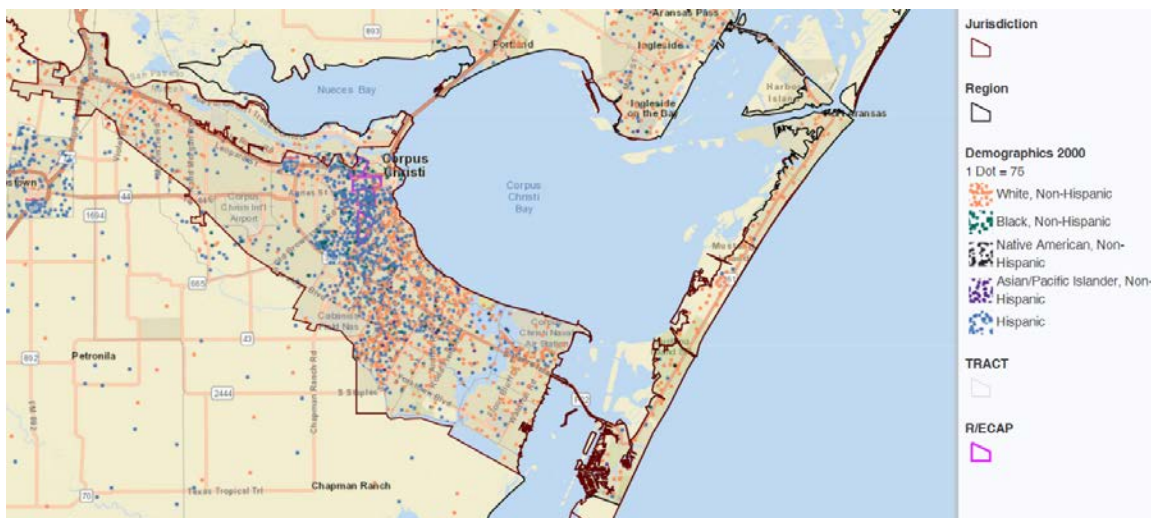
The overall population of Corpus Christi also became older over this period. Families with children decreased from 54.4 percent of the population in 1990 to 44.9 percent of the population in 2010. This corresponded with a decrease in the number of residents under age 18 from 30.1 percent of the population in 1990 to 25.8 percent of the population currently. The change in age group proportions in Corpus Christi over this period corresponded to similar changes in the larger region.

HUD Maps 2.1, 2.2, and 2.3 show the residential patterns of Corpus Christi residents from 1990 to 2010. Located on the Gulf of Mexico, Corpus Christi has a population that lives mostly in the coastal areas. In 1990, most of the population of Corpus Christi lived in the north-central area of the city. By 2000, more residents had begun to live on the outskirts of the city, particularly in the southeast and northwest areas. By 2010, the population had become more dispersed across the city, with a higher concentration of residents living on the portion of North Padre Island located within City Council District 4.

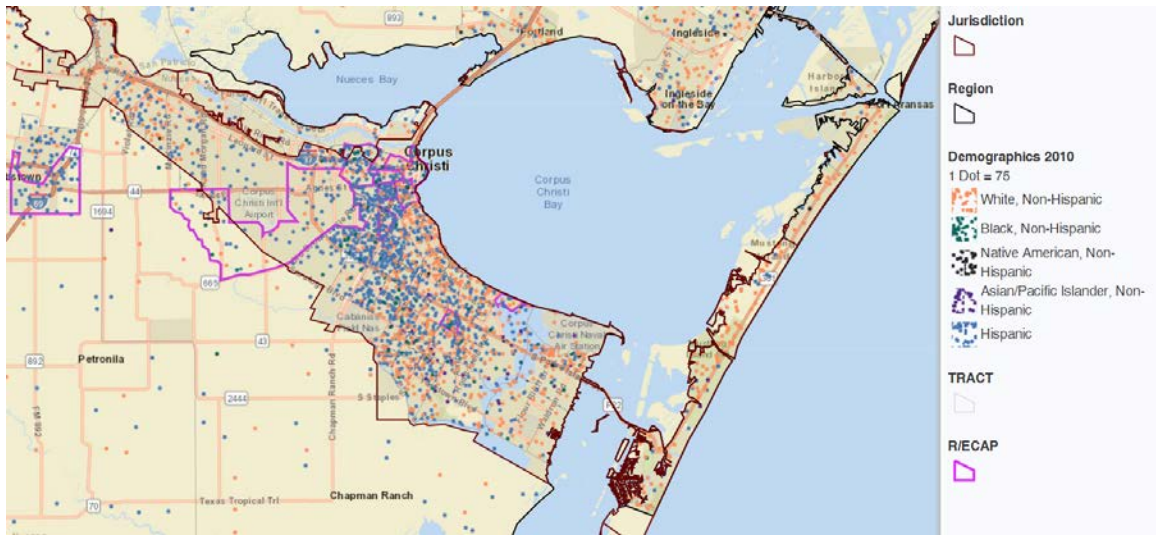
HUD Map 2.1 Race/Ethnicity Trends, 1990



HUD Map 2.2 Race/Ethnicity Trends, 2000



HUD Map 2.3 Race/Ethnicity Trends, 2010



V.B.I. SEGREGATION/INTEGRATION

ANALYSIS

a) Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

According to the U.S. Department of Housing and Urban Development (HUD), the dissimilarity index is calculated by comparing the population differences of racial or ethnic groups across individual census tracts with the population differences of racial or ethnic groups in the jurisdiction.³ HUD Table 3 shows the dissimilarity index across different racial and ethnic groups in Corpus Christi. Values on the index below 40.0 indicate low segregation, values between 40.0 and 54.0 indicate moderate segregation, and values above 55.0 indicate a high level of segregation.

The most recent data in HUD Table 3 indicate that in Corpus Christi, the highest level of segregation is between Black and Non-Hispanic White residents, followed by segregation between Hispanic and Non-Hispanic White residents. Both of these comparisons meet the threshold for moderate segregation. The lowest level of segregation in Corpus Christi is between Asian or Pacific Islander residents and Non-Hispanic White residents. Compared with the larger Corpus Christi region (Nueces and San Patricio counties), the Corpus Christi jurisdiction is currently less segregated across all racial and ethnic groups.

Each of the HUD tables and maps in this report are numbered according to the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

HUD Table 3. Racial/Ethnic Dissimilarity Trends

Racial/Ethnic Dissimilarity Index	Corpus Christi, Texas				Corpus Christi, Texas Region			
	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	44.27	40.75	37.49	39.18	47.09	43.98	40.35	42.31
Black/White	57.92	46.54	42.81	44.08	55.74	43.97	43.29	48.80
Hispanic/White	44.75	42.42	39.25	40.66	47.93	46.11	42.21	43.76
Asian or Pacific Islander/White	33.60	30.23	33.70	38.30	38.82	32.14	33.64	40.65

Source: U.S. Census Bureau, 1990-2010, as retrieved from the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

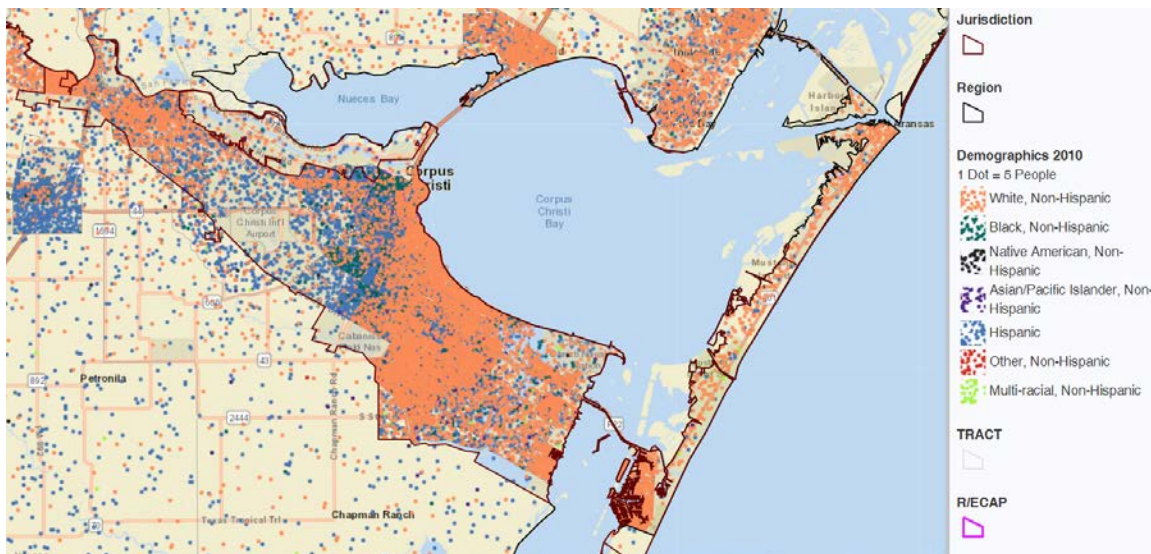
³ *Affirmatively Furthering Fair Housing (AFFH) Data Documentation*. U.S. Department of Housing and Urban Development, July 2016. p. 13. PDF File. Web. <https://www.hudexchange.info/resources/documents/AFFH-Data-Documentation.pdf>. Accessed January 2017.

b) Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

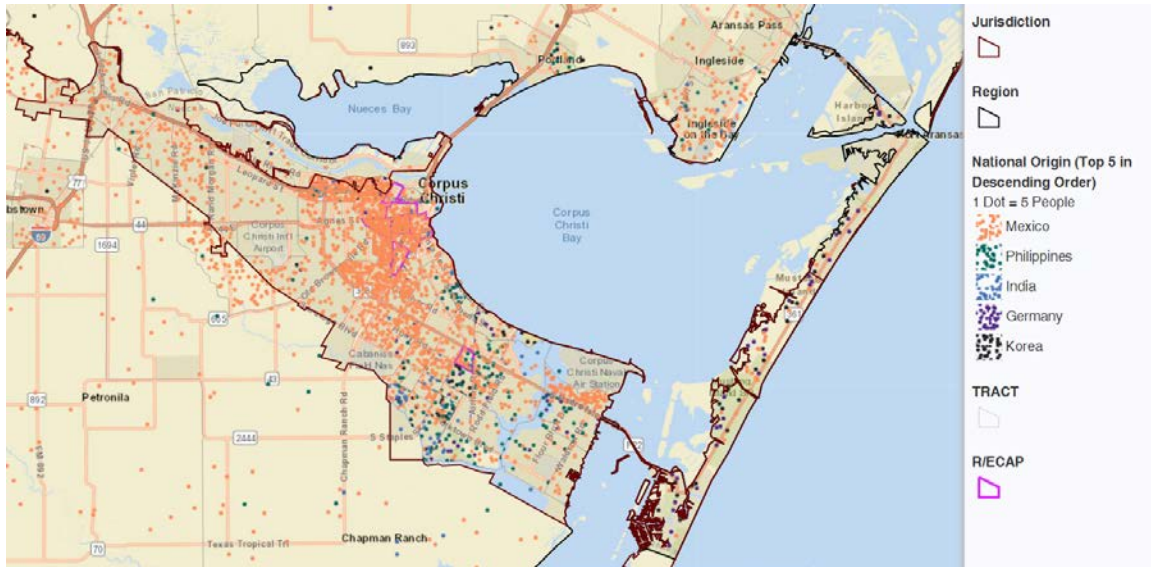
The areas in Corpus Christi with relatively high segregation are the west-central area, the northeast bay, and on the portion of North Padre Island located within City Council District 4. The west-central area (around Corpus Christi International Airport) is predominately Hispanic and includes many residents from Mexico and many Spanish-speaking residents, as shown in HUD Maps 3 and 4. The northeast bay and the portion of North Padre Island located within City Council District 4 are predominately Non-Hispanic White and include some residents from Germany, as shown in HUD Map 3.

The areas in Corpus Christi with relatively high integration are the northwest and southeast areas of the city. These areas have a diverse mix of Non-Hispanic White, Hispanic, and Black residents. HUD Map 3 shows that these areas include residents from the Philippines, living mostly in the southeast of the city, residents from India, living mostly south of the center of the city, and residents from Korea, also living south of the center of the city. Residents in these areas who have limited English proficiency speak Spanish or Asian language such as Korean, Tagalog, Chinese, and Vietnamese, and they live mostly in the southeast area.

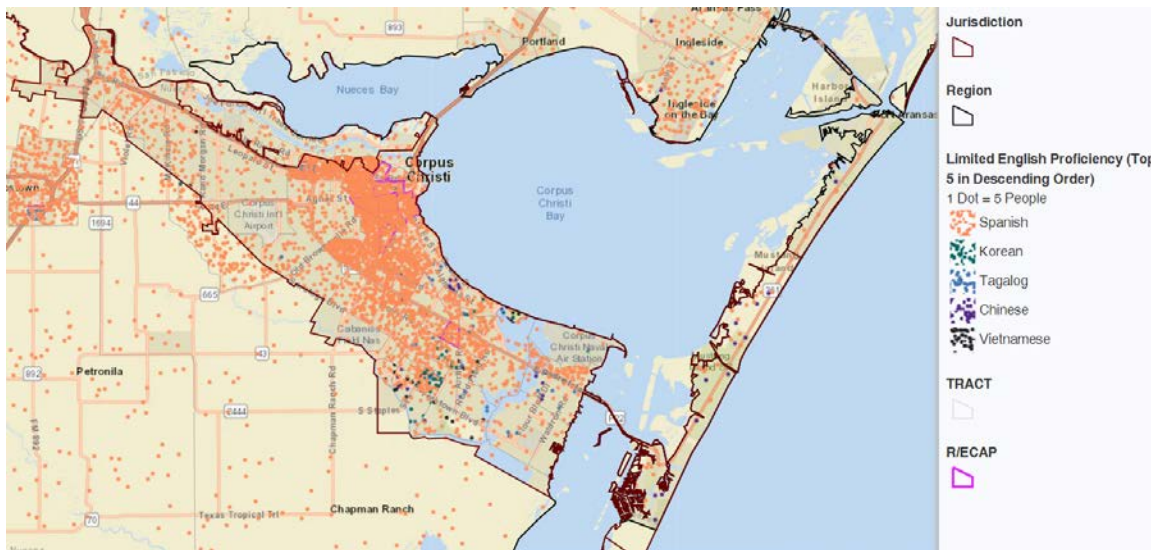
HUD Map 1 Race/Ethnicity



HUD Map 3 National Origin



HUD Map 4 Limited English Proficiency



c) Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

As shown in HUD Table 3 above, segregation between Black and Non-Hispanic White residents was high in 1990 in Corpus Christi, with a dissimilarity index near the threshold for high segregation in both the city and the larger region. Although the dissimilarity index between these groups has decreased considerably since 1990, it remains above the threshold for moderate segregation.

Segregation between Hispanic and Non-Hispanic White residents decreased from 1990 to 2010 in the city and region. In the city, the dissimilarity index met the threshold of moderate segregation in 1990 and 2000 but decreased to low segregation in 2010. It has since increased back to moderate segregation.

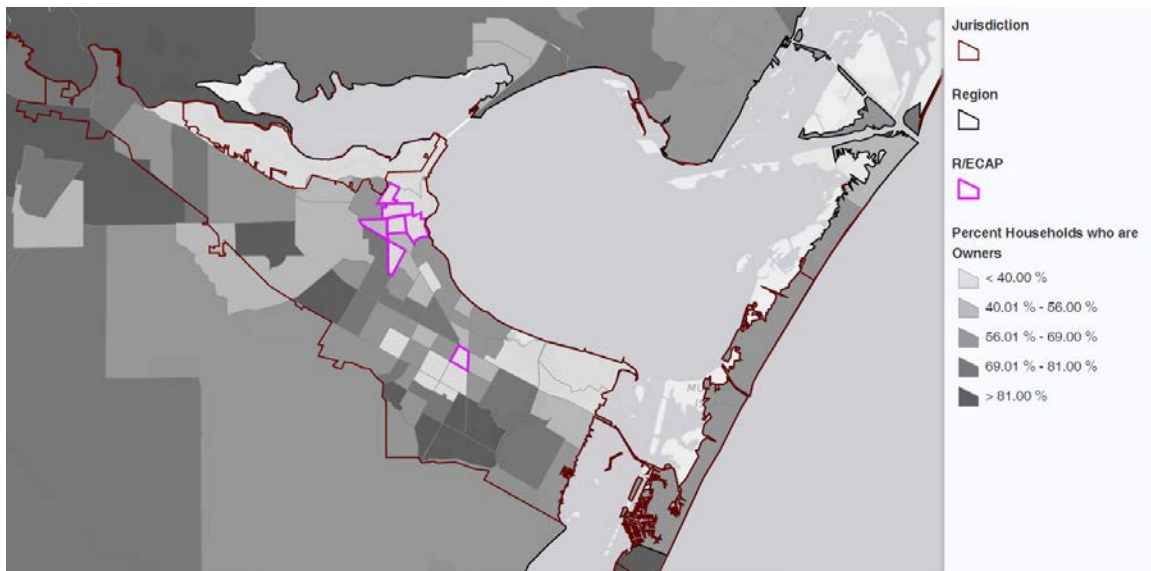
Segregation between Asian or Pacific Islander and Non-Hispanic White residents decreased from 1990 to 2000 but increased after 2000 in both Corpus Christi and the larger Corpus Christi region.

d) Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

HUD Map 16 shows the percentage of homeowners in each area of Corpus Christi. The highest concentrations of homeowners are in the west-central, central, and southeast areas of the city. The west-central and central areas are relatively segregated and include mostly Hispanic residents, while the southeast part of the city is relatively integrated, including Non-Hispanic White, Hispanic, and Black residents.

The areas with the highest concentration of renters (the lowest percentage of homeowners) are the north-central area and the northeast corner of the city, both of which are relatively segregated. The north-central area, which includes several neighborhoods designated as racially or ethnically concentrated areas of poverty (R/ECAPs) on HUD maps, has mostly Hispanic residents, while the northeast corner of the city has mostly Non-Hispanic White residents.

HUD Map 16 Housing Tenure by Owners



- e) Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

In-migration into Corpus Christi has increased since 1990. This can be seen in HUD Table 2 by an increase in the foreign-born population from 13,617 residents in 1990 to 22,728 residents in 2010. This corresponds with an increase in the Hispanic population from 130,213 residents to 182,183 residents. Since 1990, Hispanic residents as a percentage of the Corpus Christi population has increased from 50.2 to 59.7 percent, partly because the Non-Hispanic White population decreased over the same period.

HUD Table 2. Demographic Trends

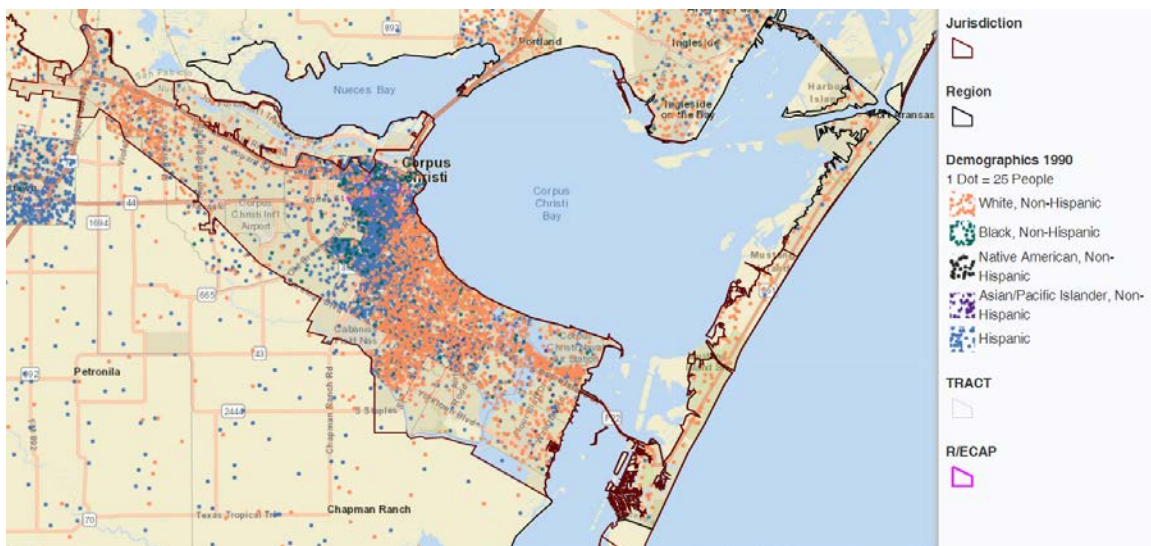
Race/Ethnicity	Corpus Christi, Texas						Corpus Christi, Texas Region					
	1990		2000		2010		1990		2000		2010	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
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Black, Non-Hispanic	11,619	4.48%	13,031	4.68%	12,858	4.21%	13,047	3.55%	15,637	3.88%	14,581	3.41%
Hispanic	130,213	50.16%	151,150	54.24%	182,183	59.69%	185,394	50.40%	212,674	52.73%	247,231	57.74%
Asian or Pacific Islander, Non-Hispanic	1,970	0.76%	4,190	1.50%	6,499	2.13%	2,695	0.73%	5,557	1.38%	7,876	1.84%
American, Non-Hispanic Native	733	0.28%	1,610	0.58%	1,523	0.50%	999	0.27%	2,480	0.61%	2,300	0.54%
National Origin												
Foreign-born	13,617	5.25%	18,701	6.71%	22,728	7.45%	17,361	4.72%	23,996	5.95%	29,513	6.89%
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Limited English Proficiency	35,789	13.79%	33,010	11.85%	31,646	10.37%	56,838	15.45%	48,651	12.06%	46,619	10.89%
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Male	126,637	48.80%	136,346	48.93%	149,679	49.04%	180,255	49.01%	198,300	49.17%	210,686	49.20%
Female	132,886	51.20%	142,311	51.07%	155,536	50.96%	187,512	50.99%	204,980	50.83%	217,499	50.80%
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65+	25,828	9.95%	30,978	11.12%	36,354	11.91%	38,364	10.43%	46,446	11.52%	54,876	12.82%
Family Type												
Families with children	36,251	54.41%	22,307	49.92%	34,261	44.89%	50,925	53.71%	34,600	50.10%	47,666	43.83%

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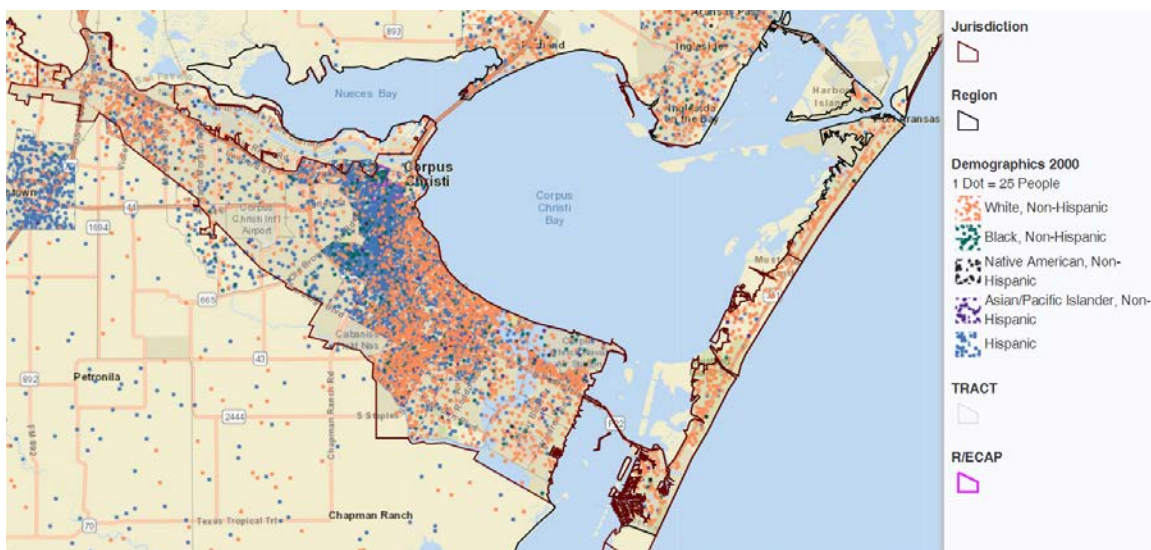
HUD Maps 2.1, 2.2, and 2.3 below show the residential patterns of racial and ethnic groups over this time period. In 1990, most Hispanic residents lived in the center of the city (between State Highway 358 and 286), and most Non-Hispanic White residents lived in the northeast of the city

(east of State Highway 286 and north of Saratoga Boulevard). By 2000, more Hispanic residents were living in the northwest and eastern areas of the city, and more Non-Hispanic White residents were living on the portion of North Padre Island located in City Council District 4. By 2010, the population was relatively integrated, although Hispanic residents continued to live mostly in the center of the city, and Non-Hispanic White residents continued to live mostly along the coast. As shown in HUD Table 2 above, the total population of Hispanic residents in Corpus Christi increased over this period while the total population of Non-Hispanic White residents decreased, suggesting that the gradual integration of these groups was driven by net in-migration of Hispanic residents into the city rather than changes in where residents live.

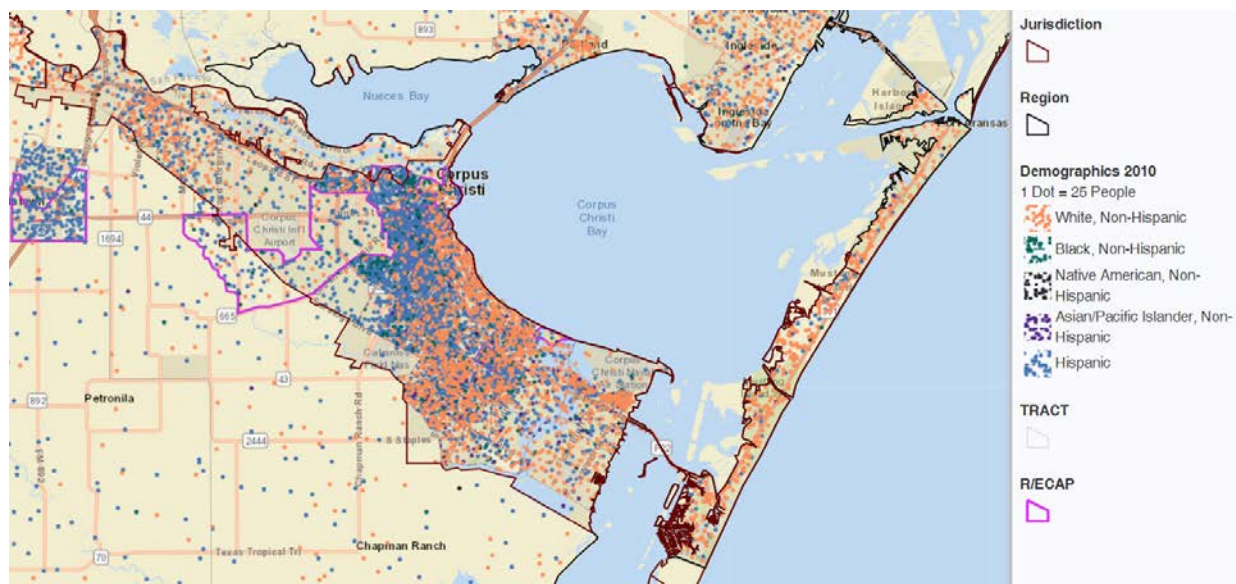
HUD Map 2.1 Race/Ethnicity Trends, 1990



HUD Map 2.2 Race/Ethnicity Trends, 2000



HUD Map 2.3 Race/Ethnicity Trends, 2010



ADDITIONAL INFORMATION

- a) **Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.**
- b) **The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and geographic mobility options for protected class groups.**

Segregation in Corpus Christi has its roots in housing and education policies from the Jim Crow era. In 1970, the U.S. Supreme Court case *Cisneros v. Corpus Christi Independent School District* became the first case to extend the ruling of *Brown v. Board of Education* to Mexican Americans.⁴ Plaintiffs in the case asserted that the dual school system in Corpus Christi represent *de jure* segregation for Mexican American and African American students.⁵ Following this case, the Corpus Christi Independent School District implemented a court-mandated busing program to integrate its schools. Due to the controversial nature of the busing, the district later ended this program.⁶

⁴ "Cisneros v. Corpus Christi ISD." *TSHAOnline.org*. Texas State Historical Association, 2017. Web. <https://tshaonline.org/handbook/online/articles/jrc02>. Accessed September 19, 2017.

⁵ "Cisneros v. Corpus Christi Independent School District." *Law.justia.com*. Justia, n.d. Web. <http://law.justia.com/cases/federal/district-courts/FSupp/330/1377/2126406/>. Accessed September 19, 2017.

⁶ Trevino, John Albert. "Cisneros v. CCISD." *Eric.ed.gov*. Education Resources Information Center, n.d. Web. <https://eric.ed.gov/?id=ED519727>. Accessed September 19, 2017.

The Hillcrest and Washington-Coles neighborhood, located in north-central Corpus Christi, also have a “deep history of segregation, isolation and decline” according to the Texas Low Income Housing Information Service. These neighborhoods were designated for Black residents during Jim Crow segregation and have since experienced environmental and economic neglect from both the city and nearby industry, according to stakeholders.

Geographic mobility in Corpus Christi can be limited due to source of income discrimination. To help address this, the Corpus Christi Housing Authority (CCHA) is working to implement monthly classes on financial literacy and other topics in order to prepare residents receiving housing choice vouchers to enter the rental market. Once implemented, this program will provide residents with the opportunity to obtain a certification of their financial literacy that they can present to potential landlords. This may allow residents in segregated areas to find housing in other parts of the city.

CONTRIBUTING FACTORS OF SEGREGATION

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- **Community opposition**
- **Displacement of residents due to economic pressures**
- **Lack of community revitalization strategies**
- **Lack of private investments in specific neighborhoods**
- **Lack of public investments in specific neighborhoods, including services or amenities**
- **Lack of regional cooperation**
- **Land use and zoning laws**
- **Lending discrimination**
- **Location and type of affordable housing**
- **Loss of Affordable Housing**
- **Occupancy codes and restrictions**
- **Private discrimination**
- **Source of income discrimination**
- **Other**

The following are contributing factors to segregation in Corpus Christi listed in priority order.

LOCATION AND TYPE OF AFFORDABLE HOUSING

Affordable housing in Corpus Christi is not evenly distributed throughout the city, and one stakeholder notes that half of all public housing units are concentrated in Census tract 15. Stakeholders also note that the affordable housing that is being built is not available at a full range of prices, with most units around \$160,000 and few in the \$100,000 to \$120,000 range.

Because affordable units are not available in the northwestern Calallen area and the south side, these areas are unable to offer a diverse range of housing options, which can contribute to segregation.

LACK OF PUBLIC INVESTMENTS IN SPECIFIC NEIGHBORHOODS, INCLUDING SERVICES OR AMENITIES

Stakeholders say that services and amenities, including proficient public schools, are often concentrated on the south side of Corpus Christi, while many jobs are concentrated near refineries in the north and northwest. Although the city has some public transportation, stakeholders say it would be difficult for residents who work these jobs to live on the south side and commute north. As a result, many residents are compelled to live close to their place of employment in the north and northwest, with few services and amenities. These areas are mostly home to Hispanic and African American residents.

LACK OF COMMUNITY REVITALIZATION STRATEGIES

Stakeholders note that most development in Corpus Christi is occurring on the south side and the west side, rather than in areas with dilapidated homes like the north side and southeast. Some stakeholders also believe that lax enforcement of housing codes leads to a deteriorating housing stock, although they do note that stricter regulations would likely place a disproportionate burden on low-income households. Despite these problems, the city has few strategies for revitalization in R/ECAPs and other areas in the north of the city. Stakeholders believe the previous Analysis of Impediments (AI) for Corpus Christi and CCHA both downplayed the existence of racial and ethnic housing segregation.

DISPLACEMENT OF RESIDENTS DUE TO ECONOMIC PRESSURES

Corpus Christi is located near many oil refineries, several of which are along the northern coast. Although the refineries are an important part of the city's economy, they also create an industrial environment that can make nearby residential areas undesirable. Over time, this has made residents with the means to move elsewhere unwilling to live in these industrialized areas on the northern coast. Because these areas are near historically segregated neighborhoods such as the Hillcrest/Washington-Coles community, this displacement has further contributed to patterns of segregation.

PRIVATE DISCRIMINATION

While not statistically significant, the number of comments received from stakeholders during interviews, focus groups, and survey responses, suggest that private discrimination based on protected class occurs in the City of Corpus Christi. Nine individuals indicated that private discrimination based on protected class were priority fair housing issues in an exercise conducted during focus groups and the public meeting. In the resident survey, seven respondents believe

that they were turned down for a mortgage based on familial status, religion, race, or sex. Fifteen residents say their real estate agent did not show them all of the places they were interested in when looking for a house or condo to buy.

Twelve survey respondents believe their rental applications were turned down for discriminatory reasons, on the basis of familial status, disability, race, or color. Others believe it was because of ethnicity. One respondent writes, “When I called and used my Spanish surname I was told there were no units, 5 minutes later, using my Anglo maiden name, I was offered the apartment.” Nine respondents explicitly stated that they have been discriminated against regarding access to housing, based on familial status, disability, race/ethnicity, or color.

SOURCE OF INCOME DISCRIMINATION

Texas bill S.B. 267 was signed by Governor Greg Abbott on June 19, 2015 and became effective September 1, 2015. The bill states:

“[A] municipality or county may not adopt or enforce an ordinance or regulation that prohibits an owner, lessee, sublessee, assignee, managing agent, or other person having the right to lease, sublease, or rent a housing accommodation from refusing to lease or rent the housing accommodation to a person because the person’s lawful source of income to pay rent includes funding from a federal housing assistance program.”

The passage of this bill means that Texas property owners can turn down potential applicants for a lease if the applicants are using Section 8 vouchers. According to the 2013-2017 Corpus Christi Consolidated Plan, 75 percent of voucher holders in Corpus Christi are Hispanic, suggesting that this form of discrimination creates a disparate impact on individuals who are Hispanic. This law was shown to have an influence on segregation in Corpus Christi after the demolition of the D.N. Leathers public housing complex. Residents who were given vouchers after the demolition of D.N. Leathers were told that they could move to other apartment complexes, but they reported trouble in actually finding landlords who would accept these vouchers. According to stakeholders, the list they were provided was also not updated. Residents incur application fees at every complex where they submit an application before they know if the landlord will accept the vouchers.

COMMUNITY OPPOSITION

According to stakeholders, community opposition is a major factor in continuing trends of segregation in Corpus Christi. Stakeholders believe that because members of the community are not knowledgeable about affordable housing, they do not understand the benefits to the city of having a variety of housing options, and assume affordable units are low quality. According to stakeholders, this leads many residents in areas such as the south side and northwest to adopt a “Not in My Backyard” (NIMBY) attitude that deters developers from building affordable units in

new, more integrated locations. As a result, most affordable housing remains in the north-central area of the city, a relatively segregated area with mostly Hispanic residents. Community opposition can further perpetuate this segregation, as the inability to develop new affordable housing in all areas of the city limits the geographic mobility of residents in segregated areas.

V.B.II. RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAPS)

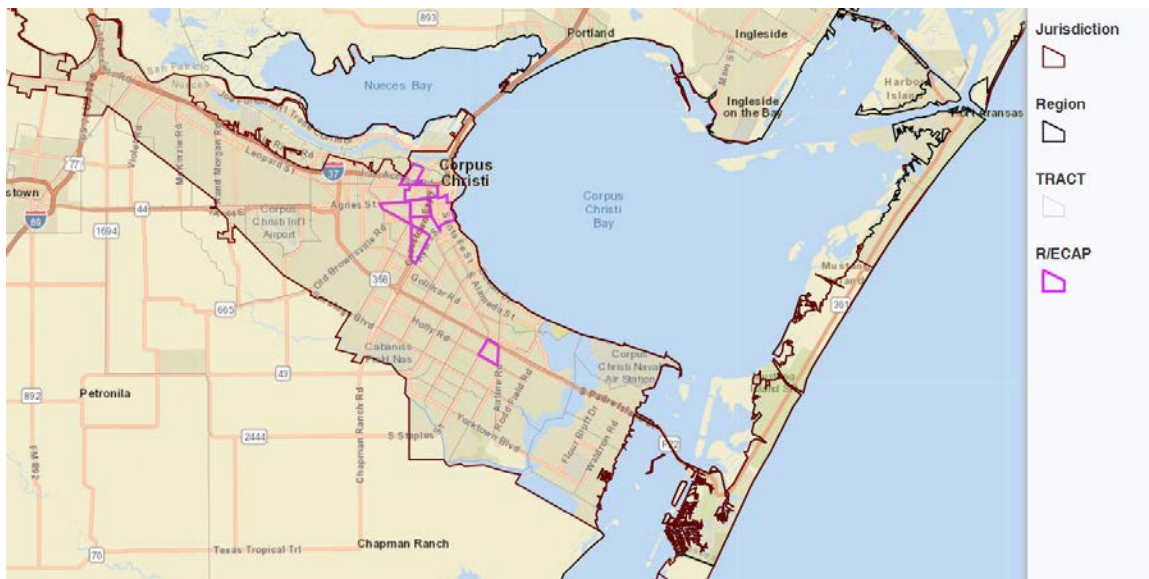
ANALYSIS

a) Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

The U.S. Department of Housing and Urban Development (HUD) defines a racially or ethnically concentrated area of poverty (R/ECAP) as an area that has a majority Non-White population and a poverty rate that is either above 40 percent or three times the regional average.⁷ HUD Map 1, provided below, shows the location of the seven census tracts that are R/ECAPs in the City of Corpus Christi, which are the only R/ECAPs in the Corpus Christi region (Nueces and San Patricio counties). These are tracts 5, 9, 10, 11, 12, and 15 (located in the center of the city north of Horne Road and east of Airport Road) and tract 33.05 (located around Glen Arbor Park between Holly Road, Padre Island Drive, Staples Street, and Airline Road).

Each of the HUD tables and maps in this report are numbered according to the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

HUD Map 1 Race/Ethnicity



⁷ *Affirmatively Furthering Fair Housing (AFFH) Data Documentation*. U.S. Department of Housing and Urban Development, July 2016. p. 10. PDF File. Web. <https://www.hudexchange.info/resources/documents/AFFH-Data-Documentation.pdf>. Accessed February 2017.

b) Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?

HUD Table 1 shows the demographics of the City of Corpus Christi and the region, and HUD Table 4 shows the demographics of the seven R/ECAPs. These data indicate that the R/ECAPs have a much higher proportion of Hispanic residents (80.0 percent) than in the City of Corpus Christi (59.7 percent) and the region as a whole (57.7 percent). The R/ECAPs also have a higher percentage of Black residents (6.1 percent) than in the city (3.9 percent) and the region (3.1 percent). On the basis of national origin, HUD Table 4 also shows that many residents in the R/ECAPs are from Mexico, with smaller percentages from India, Italy, and Canada. The percentage of families with children in the R/ECAPs (50.3 percent) is higher than the percentage in the City of Corpus Christi (44.9 percent) and in the region as a whole (43.8 percent).

HUD Table 1. Demographics

Race/Ethnicity	Corpus Christi, Texas		Corpus Christi, Texas Region			
	Number	Percent	Number	Percent		
White, Non-Hispanic	101,655	33.31%	155,550	36.33%		
Black, Non-Hispanic	11,892	3.90%	13,338	3.12%		
Hispanic	182,183	59.69%	247,231	57.74%		
Asian or Pacific Islander, Non-Hispanic	5,562	1.82%	6,704	1.57%		
Native American, Non-Hispanic	799	0.26%	1,169	0.27%		
Two or More Races, Non-Hispanic	2,758	0.90%	3,720	0.87%		
Other, Non-Hispanic	366	0.12%	473	0.11%		
National Origin						
#1 country of origin	Mexico	15,247	5.30%	Mexico	19,473	4.83%
#2 country of origin	Philippines	1,499	0.52%	Philippines	1,625	0.40%
#3 country of origin	India	731	0.25%	India	849	0.21%
#4 country of origin	Germany	589	0.20%	Germany	725	0.18%
#5 country of origin	Korea	537	0.19%	Vietnam	582	0.14%
#6 country of origin	El Salvador	460	0.16%	Korea	563	0.14%
#7 country of origin	Vietnam	441	0.15%	Canada	494	0.12%
#8 country of origin	China excl. Hong Kong & Taiwan	315	0.11%	El Salvador	480	0.12%
#9 country of origin	Honduras	311	0.11%	Honduras	383	0.10%
#10 country of origin	England	264	0.09%	China excl. Hong Kong & Taiwan	325	0.08%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Spanish	28,859	10.03%	Spanish	40,449	10.03%
#2 LEP Language	Korean	365	0.13%	Tagalog	389	0.10%
#3 LEP Language	Tagalog	344	0.12%	Vietnamese	387	0.10%
#4 LEP Language	Chinese	302	0.11%	Korean	377	0.09%

Corpus Christi, Texas				Corpus Christi, Texas Region		
#5 LEP Language	Vietnamese	298	0.10%	Chinese	313	0.08%
#6 LEP Language	German	179	0.06%	German	195	0.05%
#7 LEP Language	Gujarati	90	0.03%	Japanese	154	0.04%
#8 LEP Language	Other Asian Language	86	0.03%	Arabic	120	0.03%
#9 LEP Language	Japanese	72	0.03%	Laotian	120	0.03%
#10 LEP Language	Greek	68	0.02%	Thai	106	0.03%
Disability Type						
Hearing difficulty		13,899	4.92%		20,912	5.27%
Vision difficulty		10,222	3.62%		15,370	3.87%
Cognitive difficulty		19,171	6.78%		27,216	6.86%
Ambulatory difficulty		25,883	9.16%		39,062	9.85%
Self-care difficulty		11,913	4.21%		17,408	4.39%
Independent living difficulty		17,164	6.07%		25,457	6.42%
Sex						
Male		149,679	49.04%		210,686	49.20%
Female		155,536	50.96%		217,499	50.80%
Age						
Under 18		78,695	25.78%		111,053	25.94%
18-64		190,165	62.31%		262,256	61.25%
65+		36,354	11.91%		54,876	12.82%
Family Type						
Families with children		34,261	44.89%		47,666	43.83%

Source: U.S Census Bureau, 2010, as retrieved from the HUD AFFH Data and Mapping Tool.

HUD Table 4. R/ECAP Demographics

R/ECAP Race/Ethnicity	Corpus Christi, Texas		Corpus Christi, Texas Region	
	Number	Percent	Number	Percent
Total Population in R/ECAPs	24,973	-	24,973	-
White, Non-Hispanic	3,135	12.55%	3,135	12.55%
Black, Non-Hispanic	1,510	6.05%	1,510	6.05%
Hispanic	19,982	80.01%	19,982	80.01%
Asian or Pacific Islander, Non-Hispanic	127	0.51%	127	0.51%
Native American, Non-Hispanic	78	0.31%	78	0.31%
Other, Non-Hispanic	17	0.07%	17	0.07%
R/ECAP Family Type				
Total Families in R/ECAPs	5,650	-	5,650	-
Families with children	2,841	50.28%	2,841	50.28%

Corpus Christi, Texas				Corpus Christi, Texas Region			
R/ECAP National Origin							
Total Population in R/ECAPs		24,973	-			24,973	-
#1 country of origin	Mexico	2,414	9.67%	Mexico	2,414	9.67%	
#2 country of origin	India	107	0.43%	India	107	0.43%	
#3 country of origin	Italy	45	0.18%	Italy	45	0.18%	
#4 country of origin	Canada	30	0.12%	Canada	30	0.12%	
#5 country of origin	Germany	23	0.09%	Germany	23	0.09%	
#6 country of origin	Japan	20	0.08%	Japan	20	0.08%	
#7 country of origin	Honduras	18	0.07%	Honduras	18	0.07%	
#8 country of origin	El Salvador	16	0.06%	El Salvador	16	0.06%	
#9 country of origin	Pakistan	13	0.05%	Pakistan	13	0.05%	
#10 country of origin	Philippines	11	0.04%	Philippines	11	0.04%	

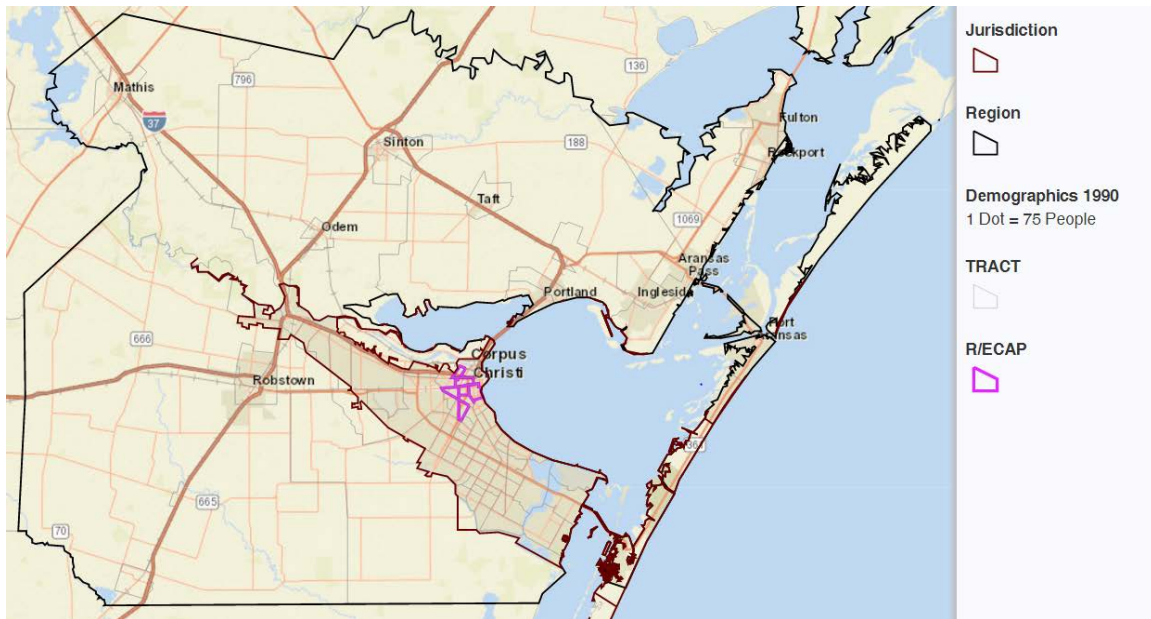
Sources: U.S Census Bureau 2010 Census and American Community Survey, as retrieved from the HUD AFFH Data and Mapping Tool.

c) Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

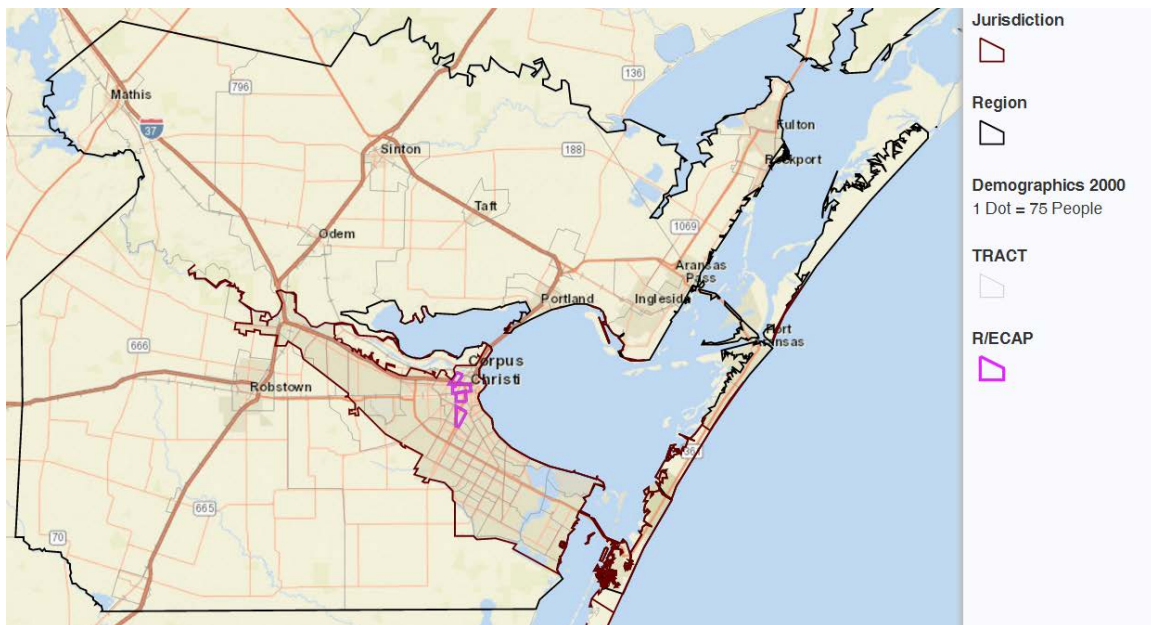
HUD Maps 2.1, 2.2, and 2.3 show the location of R/ECAPs in the City of Corpus Christi and the Corpus Christi region from 1990 to 2010. As seen in HUD Map 2.1, the region had six R/ECAPs in 1990 (tracts 5, 9, 10, 11, 12, and 15), all in central Corpus Christi. By 2000, only four of these areas (tracts 5, 10, 11, and 15) were R/ECAPs, as shown in HUD Map 2.2. In 2010, as shown in Map 2.3, not only did the region again have six R/ECAPs in central Corpus Christi (tracts 6, 10, 11, 12, 15, and 64), but it also had four more R/ECAPs: One on the eastern coast of Corpus Christi near the Texas A&M University–Corpus Christi campus (tract 27.06), one in east-central Corpus Christi around Glen Arbor Park (tract 33.05), one in south-central Corpus Christi stretching outside of city limits (tract 8), and one in the nearby city of Robstown (tract 56.02). HUD data indicate that all of these areas have high concentrations of Hispanic residents, and areas in north-central Corpus Christi have disproportionately high concentrations of Black residents.

According to HUD data, the R/ECAPs that have persisted since 1990 are tracts 10, 11, and 15, all of which are located in north-central Corpus Christi. Tracts 10 and 15, located along State Highway 286 between Horne Road and Laredo Street, both have populations that are more than 89.0 percent Hispanic. Tract 11, located near Interstate 37 just south of the Hillcrest and Washington Coles neighborhoods, has a population that is 77.3 percent Hispanic and 9.0 percent Black.

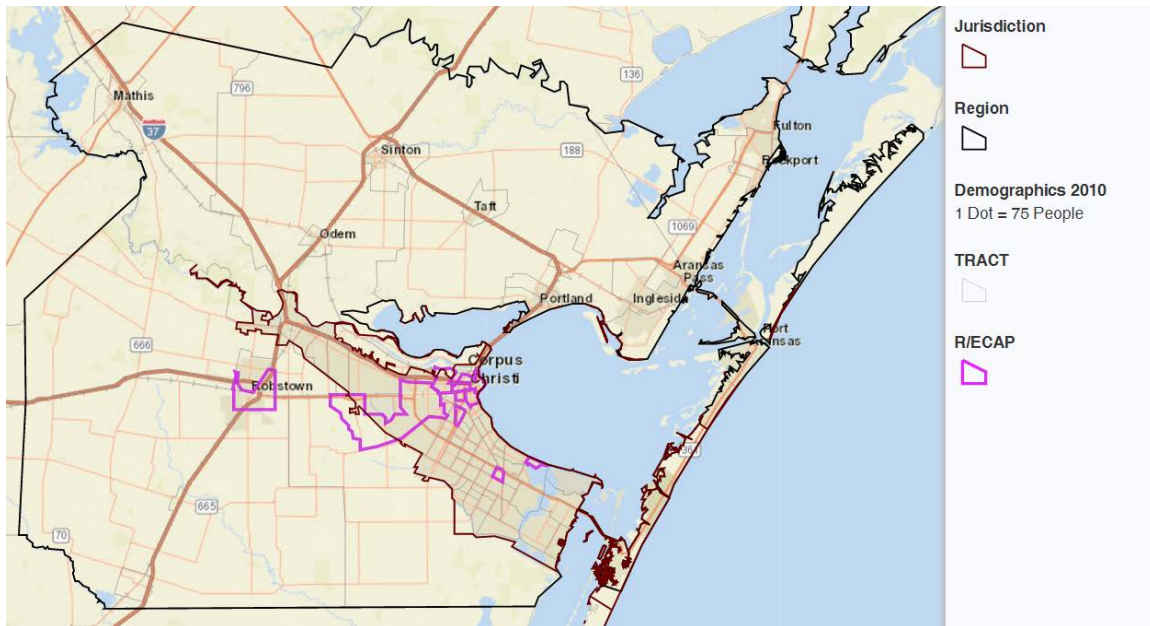
HUD Map 2.1 Race/Ethnicity Trends in the Region, 1990



HUD Map 2.2 Race/Ethnicity Trends in the Region, 2000



HUD Map 2.3 Race/Ethnicity Trends in the Region, 2010



ADDITIONAL INFORMATION

- Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.**
- The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and geographic mobility options for protected class groups.**

In 2015, residents of the Hillcrest and Washington-Coles neighborhoods filed a Title VI civil rights complaint with the Federal Highway Administration over the disparate racial impact of a proposed state highway project. Located in north-central Corpus Christi, these neighborhoods align with current R/ECAPs on HUD maps and have been the home of Black residents since the segregation of the Jim Crow era. The plaintiffs complained that the new highway proposal would create a barrier to the east that would isolate residents and increase the already-dangerous levels of pollution in the area.⁸ As a result, the Texas Department of Transportation, City of Corpus Christi, the Port Authority, and the Corpus Christi Housing Authority agreed to implement mitigation efforts, including voluntary relocation for more than 500 households, moving cost assistance, financial assistance for neighborhood churches and small businesses, improvements to the Dr. H.J. Williams Memorial Park in Hillcrest, and a new historic park in Washington-Coles.

⁸Livesley-O'Neill, Will. "Justice in Corpus Christi: Residents of segregated neighborhood win historic civil rights agreement." *Texashousers.net*. Texas Low Income Housing Information Service, 2015. Web. <https://texashousers.net/2015/12/28/justice-in-corpus-christi-residents-of-segregated-neighborhood-win-historic-civil-rights-agreement/>. Accessed September 19, 2017.

CONTRIBUTING FACTORS OF R/ECAPS

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- **Community opposition**
- **Deteriorated and abandoned properties**
- **Displacement of residents due to economic pressures**
- **Lack of community revitalization strategies**
- **Lack of local or regional cooperation**
- **Lack of private investments in specific neighborhoods**
- **Lack of public investments in specific neighborhoods, including services or amenities**
- **Land use and zoning laws**
- **Location and type of affordable housing**
- **Loss of Affordable Housing**
- **Occupancy codes and restrictions**
- **Private discrimination**
- **Source of income discrimination**
- **Other**

The following are contributing factors to R/ECAPs in Corpus Christi listed in priority order.

LACK OF PUBLIC INVESTMENTS IN SPECIFIC NEIGHBORHOODS, INCLUDING SERVICES OR AMENITIES

Stakeholders mention that the city does not provide sufficient attention to the Washington-Coles and Hillcrest neighborhoods, designed as R/ECAPs on HUD maps. For example, during the initial proposal for the Harbor Bridge, no residents from Washington-Coles and Hillcrest were consulted, despite the fact that the proposed bridge would have cut through their neighborhoods. Residents in these neighborhoods also have limited access to good schools, as shown in the Disparities in Access to Opportunity chapter, and stakeholders say the city does not make a deliberate effort to counteract this disparity. The mitigation agreement in place between the Texas Department of Transportation (TxDOT) and the Federal Highway Administration (FHWA) attempts to address the impact of the Harbor Bridge project through a voluntary relocation program.

LACK OF PRIVATE INVESTMENTS IN SPECIFIC NEIGHBORHOODS

Since many R/ECAPs are near industrial areas of the city, residents in R/ECAPs can be influenced by the operations of private companies. For example, when an asphalt leak from the company Ergon Asphalt & Emulsions triggered a ban on the Corpus Christi water supply, residents near

industrial areas were told to refrain from using tap water for a longer period than other residents.⁹ Stakeholders believe that these companies could be more responsible in taking accountability for their actions, both in terms of environmental and economic consequences.

SOURCE OF INCOME DISCRIMINATION

Residents who were given vouchers after the demolition of the D.N. Leathers public housing complex in the Hillcrest neighborhood reported difficulty finding landlords who would accept their vouchers, often because of source of income discrimination. Moreover, even at developments that did accept vouchers, residents faced other financial restrictions, such as requirements that the tenant earn 2.5 times the market rent.¹⁰ Because of this, many must remain in the Washington-Coles and Hillcrest neighborhoods, which are noted as R/ECAPs on HUD maps.

PRIVATE DISCRIMINATION

While not statistically significant, comments received from stakeholders during interviews, focus groups, and survey responses, suggest that private discrimination based on protected class occurs in the City of Corpus Christi. Nine individuals indicated that private discrimination based on protected class were priority fair housing issues in an exercise conducted during focus groups and the public meeting. In the resident survey, seven respondents believe that they were turned down for a mortgage based on familial status, religion, race, or sex. Fifteen residents say their real estate agent did not show them all of the places they were interested in when looking for a house or condo to buy.

Twelve survey respondents believe their rental applications were turned down for discriminatory reasons, on the basis of familial status, disability, race, or color. Others believe it was because of ethnicity. One respondent writes, “When I called and used my Spanish surname I was told there were no units, 5 minutes later, using my Anglo maiden name, I was offered the apartment.” Nine respondents explicitly stated that they have been discriminated against regarding access to housing, based on familial status, disability, race/ethnicity, or color.

DETERIORATED OR ABANDONED PROPERTIES

According to stakeholders, neighborhoods in the north and the southeast areas of the city that represent R/ECAPs are often home to low-quality, dilapidated properties. These include the Hillcrest and Washington-Coles neighborhoods, which are the historical homes of African American residents and are falling into disrepair. This is only exacerbated by the nearby industries and oil refineries on the north shore, which can produce air pollution that make the areas undesirable.

⁹ “Corpus Christi Water Backflow Announcement and Map.” *Tceq.texas.gov*. Texas Commission on Environmental Quality, 2016. Web. <https://www.tceq.texas.gov/assets/public/response/corpus-christi-water-backflow-announcement-and-map-121616.pdf>. Accessed September 12, 2017.

¹⁰ Gaines, Erin and Peter McGraw. “Re: Comments regarding D.N. Leathers I Demolition/Disposition Application.” Email message to Darryl McGee and Gustavo Velasquez. May 6, 2016.

V.B.III. DISPARITIES IN ACCESS TO OPPORTUNITY

INTRODUCTION

The disparities in access to opportunity section of the Assessment of Fair Housing (AFH) expands the fair housing analysis beyond housing to examine conditions that affect economic opportunity more broadly. This section of the AFH examines access to opportunity in education, employment, transportation, low poverty environments, and environmentally healthy neighborhoods based on race and ethnicity, national origin, and family status. U.S. Department of Housing and Urban Development (HUD) maps and tables are available through the Affirmatively Furthering Fair Housing (AFFH) data and mapping tool and are based on data from the Decennial U.S. Census, American Community Survey (ACS), Great Schools, Common Core of Data, School Attendance Boundary Information System (SABINS), Location Affordability Index (LAI), Longitudinal Employer-Household Dynamics (LEHD), and National Air Toxics Assessment (NATA). Additional data sources include Census Transportation Planning Products data from the Federal Highway Administration, local governments, and transit authorities.

INDICES DEFINITIONS

HUD has developed a series of indices to help inform communities about segregation in their jurisdiction and region, as well as about disparities in access to opportunity. In general, higher values of each index can be interpreted as greater access to opportunity. A description of the methodology for each of the indices may be found below:

LOW POVERTY INDEX. The low poverty index captures poverty in a given neighborhood. The index is based on the poverty rate. Values are inverted and ranked nationally to obtain percentiles. The resulting values range from 0 to 100, the higher the value, the less exposure to poverty in a neighborhood.

Data Source: American Community Survey, 2009-2013

Related Template Tables/Maps: Table 12; Map 12

SCHOOL PROFICIENCY INDEX. The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. Values are ranked nationally to obtain percentiles and range from 0 to 100. The higher the value, the higher the school system quality is in a neighborhood.

Data Source: Great Schools (proficiency data, 2013-14 or more recent); Common Core of Data (school addresses and enrollment, 2013-14); SABINS (attendance boundaries, 2016).

Related Template Tables/Maps: Table 12; Map 7

LABOR MARKET ENGAGEMENT INDEX. The labor market engagement index provides a summary description of the relative intensity of labor market engagement in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. Values are ranked as national percentiles and range from 0 to 100. The higher the value of this index, the higher the labor force participation in a neighborhood.

Data Source: American Community Survey, 2008-2012

Related Template Tables/Maps: Table 12; Map 9

TRANSIT TRIPS INDEX. The transit trips index is based on estimates of transit trips taken by a family that meets the following description: a three-person single-parent family with income at 50 percent of the median income for renters for the region, where region is defined as the Core-Based Statistical Area (CBSA). The estimates come from the LAI. Values are ranked nationally to obtain percentiles, with values ranging from 0 to 100. The higher the transit trips index, the more likely residents in that neighborhood utilize public transit. The index controls for income, so a higher value will often reflect better access to public transit.

Data Source: Location Affordability Index (LAI) data, 2008-2012

Related Template Tables/Maps: Table 12; Map 10

LOW TRANSPORTATION COST INDEX. The low transportation cost index is based on estimates of transportation costs for a three-person single-parent family with income at 50 percent of the median income for renters for the region (the CBSA). The estimates come from the LAI. Values are inverted and ranked nationally to obtain percentiles, with values ranging from 0 to 100. The higher the index score, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a range of reasons, including greater access to public transportation and higher density of homes, services, and jobs in the neighborhood and surrounding community.

Data Source: Location Affordability Index (LAI) data, 2008-2012

Related Template Tables/Maps: Table 12; Map 11

JOBS PROXIMITY INDEX. The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily. Values are ranked nationally to obtain percentiles with values ranging from 0 to 100. The higher the value, the better the access to employment opportunities for residents in a neighborhood.

Data Source: Longitudinal Employer-Household Dynamics (LEHD) data, 2014

Related Template Tables/Maps: Table 12; Map 8

ENVIRONMENTAL HEALTH INDEX. The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The index is a linear combination of standardized EPA estimates of air quality carcinogenic, respiratory, and neurological hazards. Values are inverted and ranked nationally to obtain percentiles, with values ranging from 0 to 100. The higher the index value, the less exposure to toxins harmful to human health and the better the environmental quality of a neighborhood, where a neighborhood is defined as a census block-group.

Data Source: National Air Toxics Assessment (NATA) data, 2011

Related Template Tables/Maps: Table 12; Map 13

MISSING DATA. Index scores for some census tracts are not computed. In some cases, missing data prohibits drawing firm conclusions about disparities in access.

SUPPLEMENTARY DATA. In addition to the HUD access to opportunity indices and associated maps, supplementary data and maps are included from a number of sources. A major source of supplementary data is the 2011-2015 ACS.

ANALYSIS

HUD Table 12, provided below, displays the aforementioned opportunity indices across various racial or ethnic groups and for households below and above the federal poverty line, in the city of Corpus Christi and the region as whole. The Corpus Christi region consists of Nueces and San Patricio counties. Frequent reference to this table is made in the analysis that follows.

Each of the HUD tables and maps in this report are numbered according to the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

HUD Table 12. Opportunity Indicators, by Race/Ethnicity

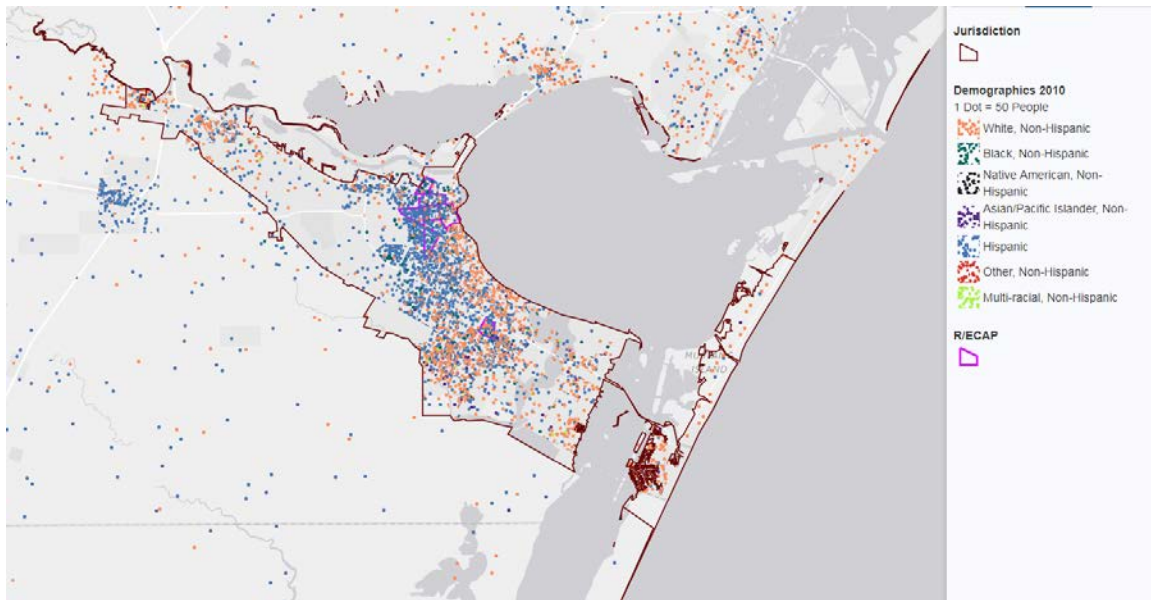
Corpus Christi, Texas	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	51.51	61.05	57.34	50.32	33.55	47.02	85.70
Black, Non-Hispanic	35.68	43.36	37.99	56.81	41.22	50.32	75.65
Hispanic	36.26	41.82	39.97	54.95	38.78	49.36	80.09
Asian or Pacific Islander, Non-Hispanic	61.55	70.60	64.98	51.28	33.31	42.33	90.40
Native American, Non-Hispanic	42.44	53.19	48.76	53.49	36.93	47.69	83.67
Population below federal poverty line							
White, Non-Hispanic	36.37	54.52	46.52	51.50	36.42	50.55	82.39
Black, Non-Hispanic	21.33	33.23	29.23	58.63	43.57	53.73	73.25
Hispanic	24.98	34.04	32.64	57.72	41.50	52.59	77.86
Asian or Pacific Islander, Non-Hispanic	44.34	60.24	61.68	58.12	45.21	53.54	89.40

Corpus Christi, Texas	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Native American, Non-Hispanic	23.38	46.30	36.88	62.27	47.92	46.82	88.02
Corpus Christi, Texas Region							
Total Population							
White, Non-Hispanic	47.92	61.00	53.79	42.73	27.57	47.39	89.84
Black, Non-Hispanic	35.45	43.27	38.02	53.93	38.57	50.40	78.09
Hispanic	35.08	41.72	37.98	48.33	32.41	49.09	83.66
Asian or Pacific Islander, Non-Hispanic	57.55	70.78	62.01	47.48	30.61	42.24	92.05
Native American, Non-Hispanic	41.35	52.87	48.33	45.92	30.81	47.64	88.41
Population below federal poverty line							
White, Non-Hispanic	35.89	52.52	45.71	44.71	30.55	52.01	87.53
Black, Non-Hispanic	23.59	34.95	30.84	55.19	40.16	52.90	76.23
Hispanic	25.15	33.04	31.32	49.98	34.11	50.84	82.35
Asian or Pacific Islander, Non-Hispanic	42.06	58.34	59.64	55.58	42.07	53.26	89.72
Native American, Non-Hispanic	26.46	38.09	30.84	49.64	36.16	48.58	87.75

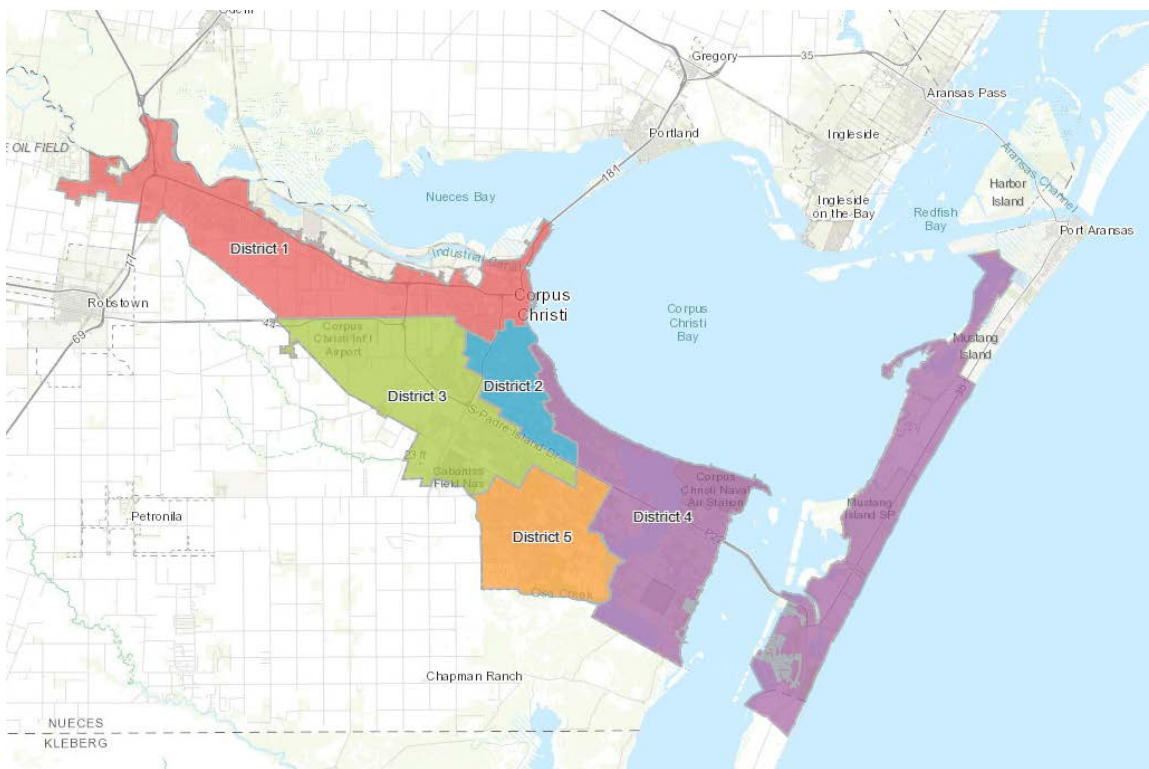
Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Refer to the Data Documentation for details (www.hudexchange.info).

HUD Map 1 Race and Ethnicity and R/ECAPS



Map V-1 Corpus Christi City Council



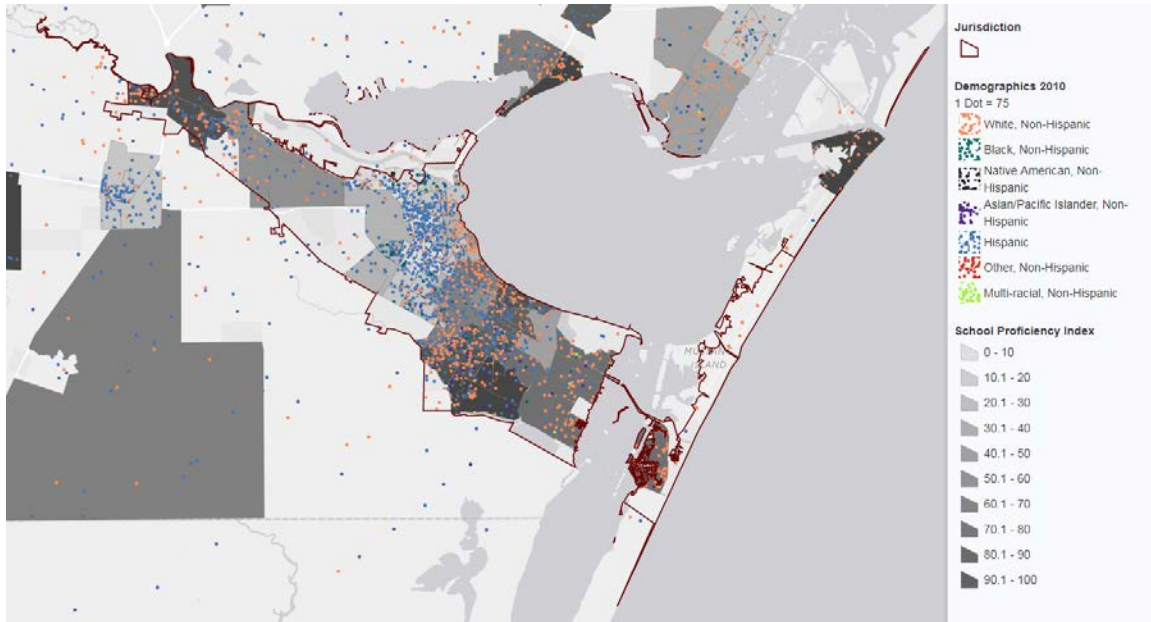
The City of Corpus Christi is divided into five city council districts as indicated in Map V-1 above. Each district is represented by one city council member. The boundaries of these districts are used as references for the identification of geographic disparities in access to opportunities throughout this section.

EDUCATIONAL OPPORTUNITIES

a. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

HUD Table 12 shows that of all racial and ethnic groups, Asian and Pacific Islander residents have the greatest access to proficient schools among both the general population and the population below the federal poverty line. Black and Hispanic residents experience low access to proficient schools compared with other racial and ethnic groups among both the general population and the population below the federal poverty line. The map of school proficiency by race and ethnicity (HUD Map 7.1) demonstrates this disparity clearly.

HUD Map 7.1 School Proficiency by Race and Ethnicity



Five-year estimates from the American Community Survey ACS (2011-15), available in Table V-1 below, indicate that residents who identify as being of “some other race alone” have the lowest educational attainment of any group, followed by Hispanic or Latino residents. Hispanic or Latino residents are much less likely to have graduated high school than Non-Hispanic White residents and Black and Hispanic or Latino residents are much less likely to hold a bachelor’s degree or higher than Non-Hispanic Whites. While a smaller percentage of Asian residents have completed at least high school than Non-Hispanic Whites, they are more likely than any other racial or ethnic group to hold a bachelor’s degree or higher.

Table V-1. Educational Attainment by Race/Ethnicity

	Total	Percent
White alone	175,870	
High school graduate or higher	143,697	81.7%
Bachelor's degree or higher	37,465	21.3%
White alone, not Hispanic or Latino	73,596	
High school graduate or higher	69,117	93.9%
Bachelor's degree or higher	24,707	33.6%
Black alone	8,658	
High school graduate or higher	7,193	83.1%
Bachelor's degree or higher	1,139	13.2%
American Indian or Alaska Native alone	1,109	
High school graduate or higher	941	84.9%
Bachelor's degree or higher	216	19.5%
Asian alone	4,228	

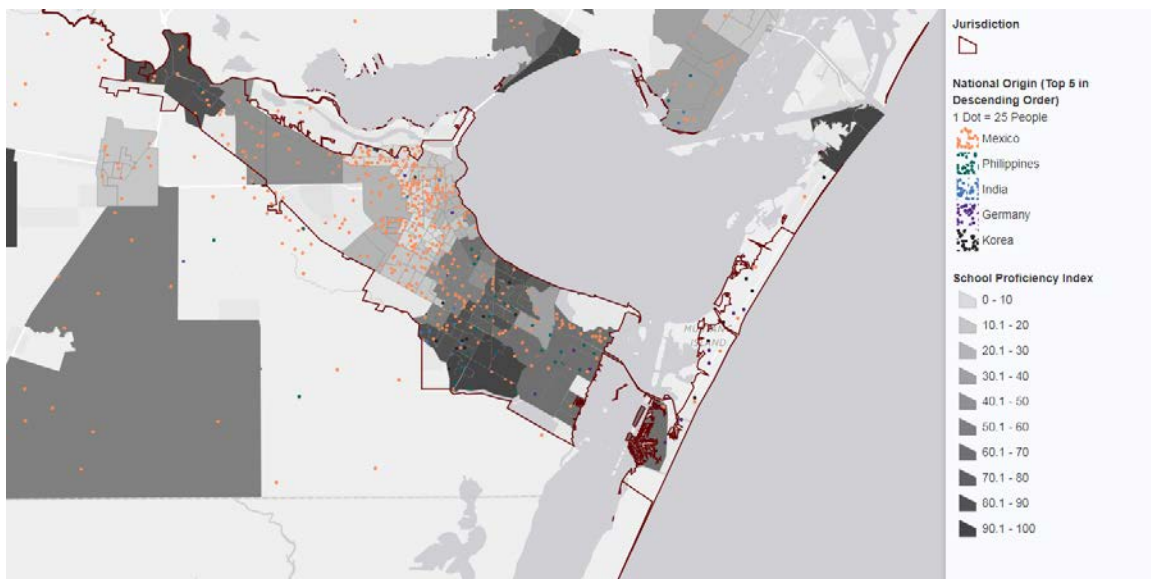
	Total	Percent
High school graduate or higher	3,702	87.6%
Bachelor's degree or higher	2,032	48.1%
Native Hawaiian and Other Pacific Islander alone	118	
High school graduate or higher	116	98.3%
Bachelor's degree or higher	39	33.1%
Some other race alone	10,367	
High school graduate or higher	7,500	72.3%
Bachelor's degree or higher	1,013	9.8%
Two or more races	2,848	
High school graduate or higher	2,354	82.7%
Bachelor's degree or higher	564	19.8%
Hispanic or Latino Origin	114,972	
High school graduate or higher	83,742	72.8%
Bachelor's degree or higher	13,967	12.1%

Data Sources: ACS five-year estimates 2011-2015

b. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

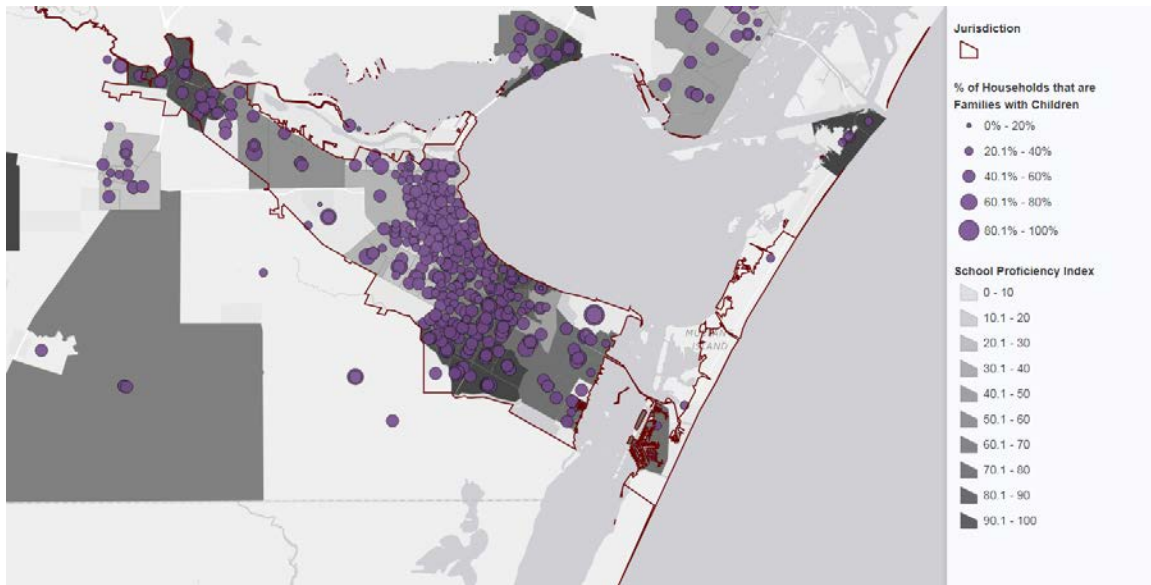
The map of school proficiency by national origin (HUD Map 7.2) shows that residents of Mexican origin are concentrated in census tracts with less access to proficient schools. Residents from the Philippines, India, Germany and Korea appear to live in census tracts with more access to proficient schools.

HUD Map 7.2 School Proficiency by National Origin



It is not immediately clear from the map of school proficiency by family status (HUD Map 7.3) that families with children as a group experience a disparity in access to proficient schools. Several census tracts have large percentages of families with children where school proficiency indices are very low, especially in predominantly Hispanic areas; however, other census tracts with large percentages of families with children have better access to proficient schools.

HUD Map 7.3 School Proficiency by Family Status



c. Describe how school-related policies, such as school enrollment policies, affect a student’s ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

The state of Texas has adopted the following school enrollment policy that affects districts throughout the region and impacts the ability of protected class groups to access proficient schools.

Texas Education Code Section 29.202 indicates that:

A student is eligible to receive a public education grant or to attend another public school in the district in which the student resides under this subchapter if the student is assigned to attend a public school campus:

- (1) at which 50 percent or more of the students did not perform satisfactorily on an assessment instrument administered under Section 39.023(a) or (c) in any two of the preceding three years; or*
- (2) that, at any time in the preceding three years, failed to satisfy any standard under Section 39.054(e)*

Section 29.203 indicates that:

A school district chosen by a student's parent under Section 29.201 is entitled to accept or reject the application for the student to attend school in that district but may not use criteria that discriminate on the basis of a student's race, ethnicity, academic achievement, athletic abilities, language proficiency, sex, or socioeconomic status. A school district that has more acceptable applicants for attendance under this subchapter than available positions must give priority to students at risk of dropping out of school as defined by Section 29.081 and must fill the available positions by lottery. However, to achieve continuity in education, a school district may give preference over at-risk students to enrolled students and to the siblings of enrolled students residing in the same household or other children residing in the same household as enrolled students for the convenience of parents, guardians, or custodians of those children.

This policy, which is mirrored in the policies of local school districts serving Corpus Christi, prohibits schools throughout Texas from denying a request from a student to transfer from a non-performing school to another school in the district on the basis of race, ethnicity, academic achievement, athletic abilities, language proficiency, sex, or socioeconomic status. Proficient schools may deny transfers if the school has insufficient space for additional students. This policy allows parents some choice in which school their child attends and protects students seeking transfers from discrimination, but it does not guarantee access to proficient schools.

According to stakeholders consulted during the public participation activities, many people want to live on the south side of Corpus Christi for the good schools, but many jobs are concentrated where the refineries are, north and northwest. Although public transportation is available in the city, it would be difficult for someone who relied on public transportation to live on the south side and travel to the refineries for work due to the amount of time it would take.

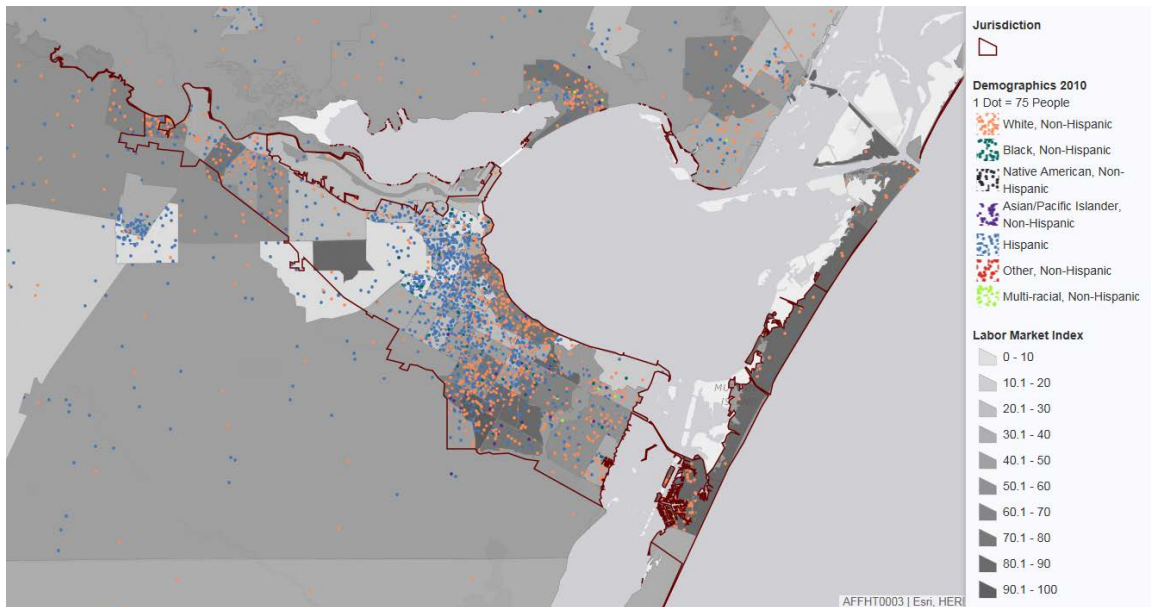
Based on the data discussed earlier in this chapter, residents of Mexican origin appear to be least successful of the protected classes in accessing proficient schools.

EMPLOYMENT OPPORTUNITIES

a) Describe any disparities in access to jobs and labor markets by protected class groups.

As shown in HUD Map 9.1, Black and Hispanic residents live in areas with substantially lower labor market engagement compared with other groups. Regardless of poverty status, Asian and Pacific Islander residents have the best access to neighborhoods with high labor market engagement.

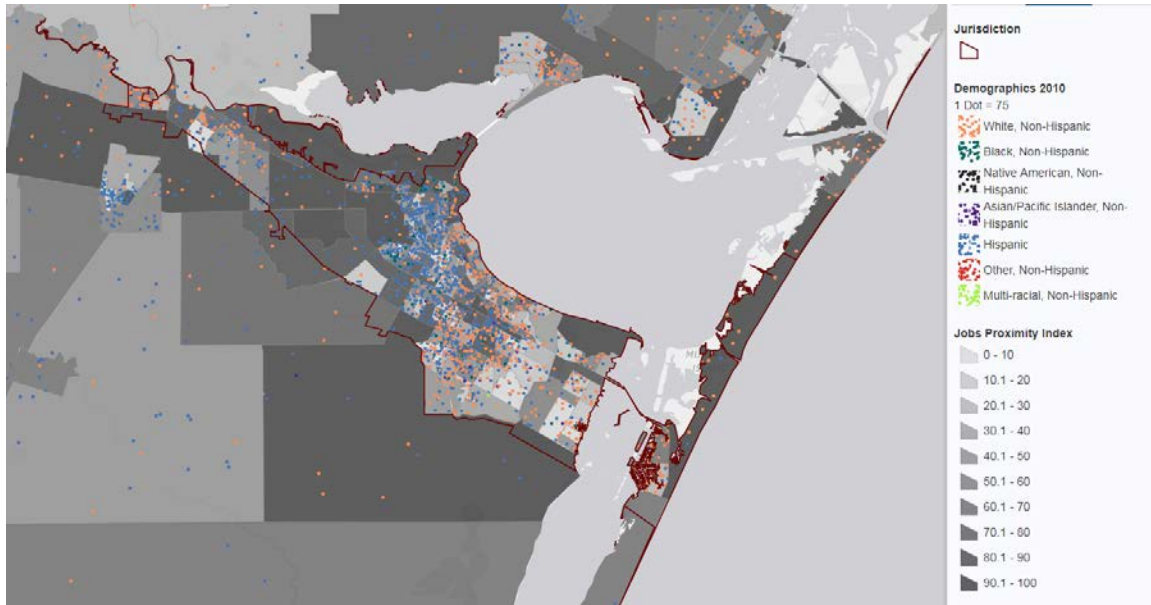
HUD Map 9.1 Labor Market by Race and Ethnicity



b) How does a person's place of residence affect their ability to obtain a job?

HUD Table 12 and HUD Map 8.1 below indicate that Black and Hispanic residents live closest to job opportunities regardless of poverty status. Among the general population, Asian and Pacific Islander residents live the farthest from job opportunities. Among the population below the federal poverty line, Native American residents live farthest from job opportunities. The difference among all groups in job proximity is relatively small compared with other disparities in access to opportunities.

HUD Map 8.1 Job Proximity by Race and Ethnicity



Five-year estimates from the ACS (2011-15), available in Table V-2 below, indicate that the unemployment rate is highest in City Council District 1 followed by City Council Districts 2 and 3. City Council District 5 has the lowest rate of unemployment. Black and Hispanic residents are concentrated near the city center in Districts 1, 2, and 3, while Non-Hispanic white residents and Asian or Pacific Islander Residents are concentrated in Districts 4 and 5, to the southeast of the city center.

Table V-2 Unemployment by City Council District

City Council District	Population	Unemployed Population	Unemployment Rate
1	35,600	3,986	11.20%
2	36,050	3,586	9.95%
3	50,060	4,896	9.78%
4	45,877	3,543	7.72%
5	46,085	1,956	4.25%

Data Sources: ACS five-year estimates 2011-2015

c) Which racial/ethnic, national origin or family status groups are least successful in accessing employment?

Five-year estimates from the ACS (2011-15), available in Table V-3 below, indicate that unemployment in Corpus Christi is highest among Native Hawaiian and Pacific Islander residents and Black residents, although only 123 residents from Hawaii or other Pacific Islands reside in

Corpus Christi. Asian residents experience the lowest rate of unemployment, followed by Non-Hispanic White residents.

Table V-3 Unemployment by Race/Ethnicity

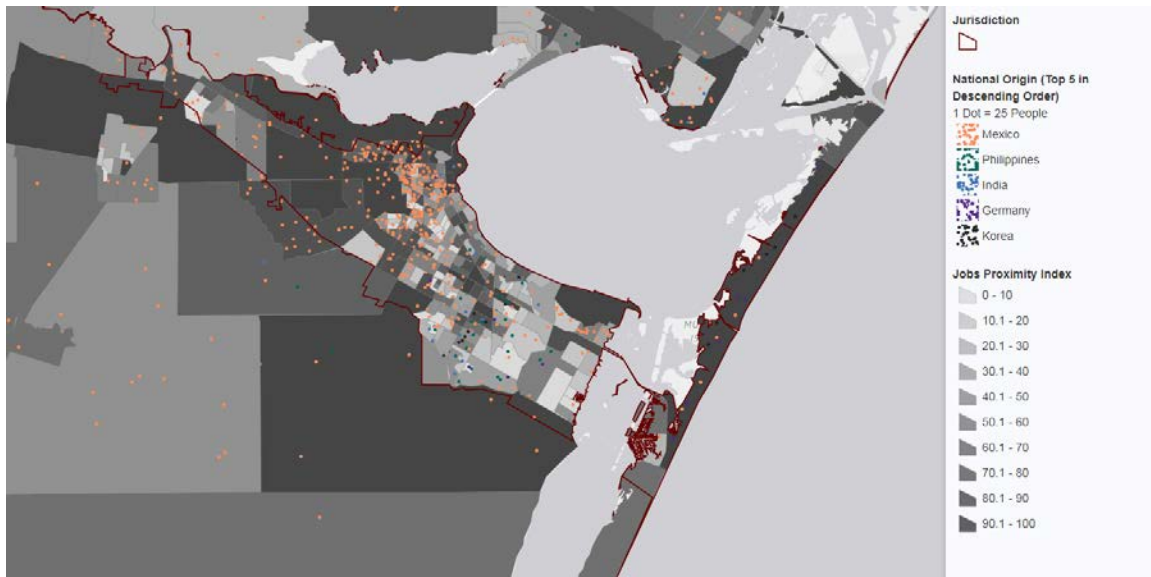
	Total	Labor Force Participation Rate	Employment/Population Ratio	Unemployment Rate
Population 16 years and over	245,452	65.0%	60.3%	6.4%
White alone	211,837	64.8%	60.0%	6.4%
Black or African American alone	10,748	63.2%	56.7%	8.8%
American Indian and Alaska Native alone	1,242	57.4%	52.9%	7.1%
Asian alone	5,016	68.5%	65.6%	3.5%
Native Hawaiian and Other Pacific Islander alone	123	83.7%	62.6%	10.5%
Some other race alone	12,673	70.2%	67.0%	4.4%
Two or more races	3,813	64.8%	58.0%	7.7%
Hispanic or Latino origin (of any race)	143,138	66.0%	61.1%	7.3%
White alone, not Hispanic or Latino	84,469	63.3%	58.9%	4.8%

Data Sources: ACS five-year estimates 2011-2015

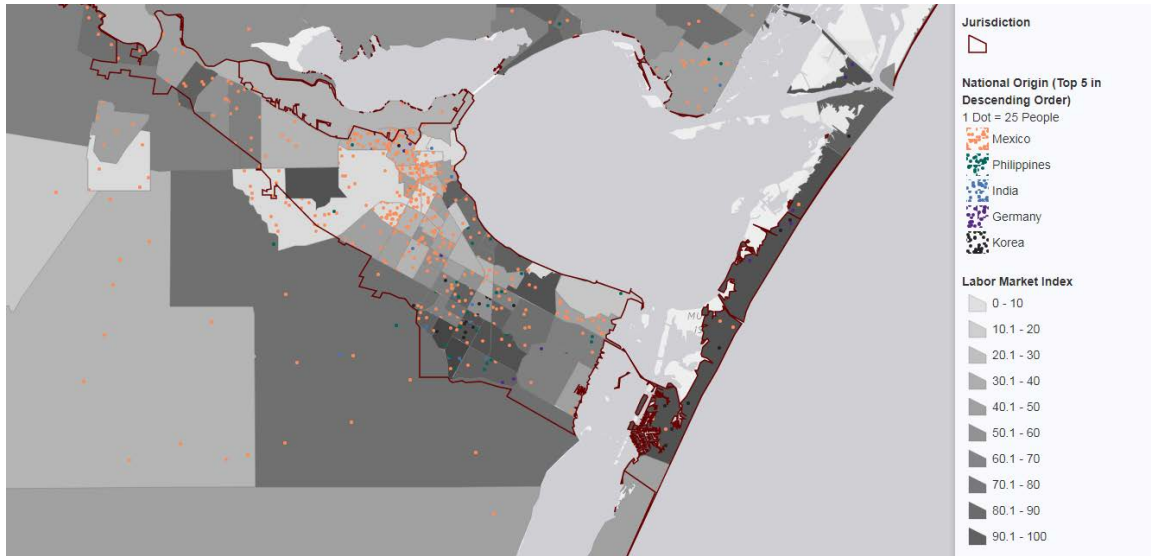
HUD Map 8.2 shows a concentration of residents from the Philippines, India and Korea in District 5, farther from job opportunities. HUD Map 8.3 of job proximity and family status does not show any clear disparity in proximity to job opportunities for families with children.

HUD Map 9.2 of labor market engagement and national origin shows that residents from Mexico are concentrated in District 2 and the east end of District 1, where labor market engagement is relatively low. HUD Map 9.3 suggests that census tracts with a higher percentage of families with children tend to have lower labor market engagement.

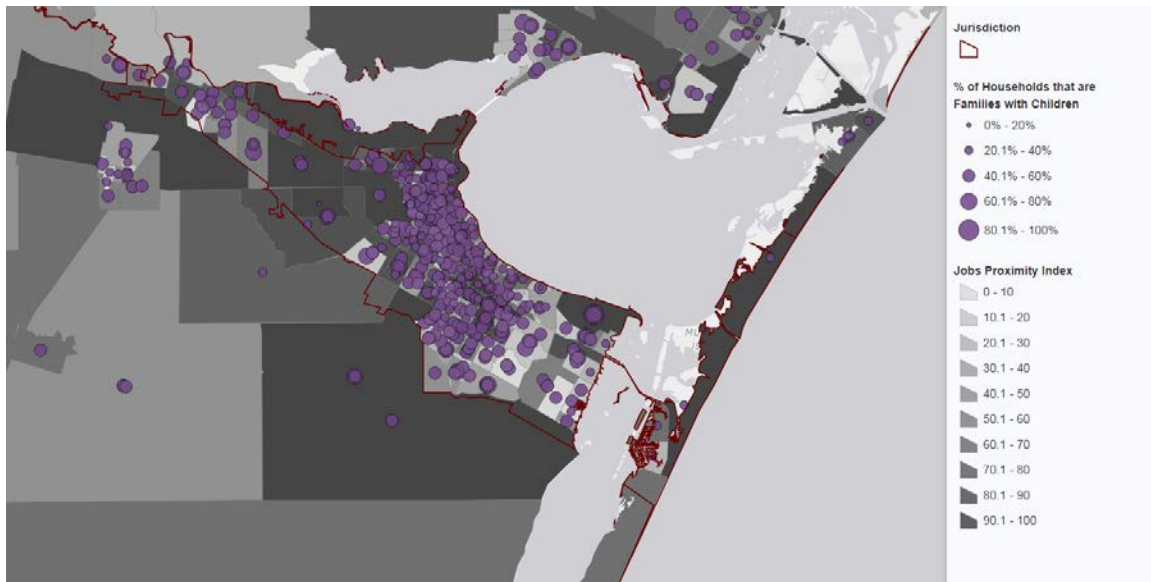
HUD Map 8.2 Job Proximity by National Origin



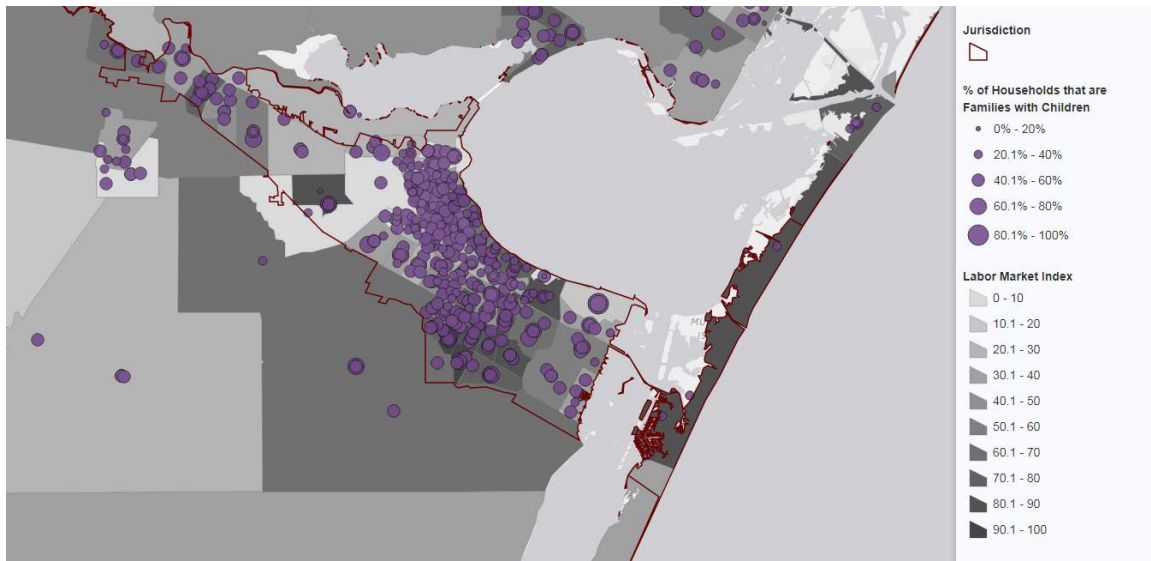
HUD Map 9.2 Labor Market by National Origin



HUD Map 8.3 Job Proximity by Family Status



HUD Map 9.3 Labor Market by Family Status

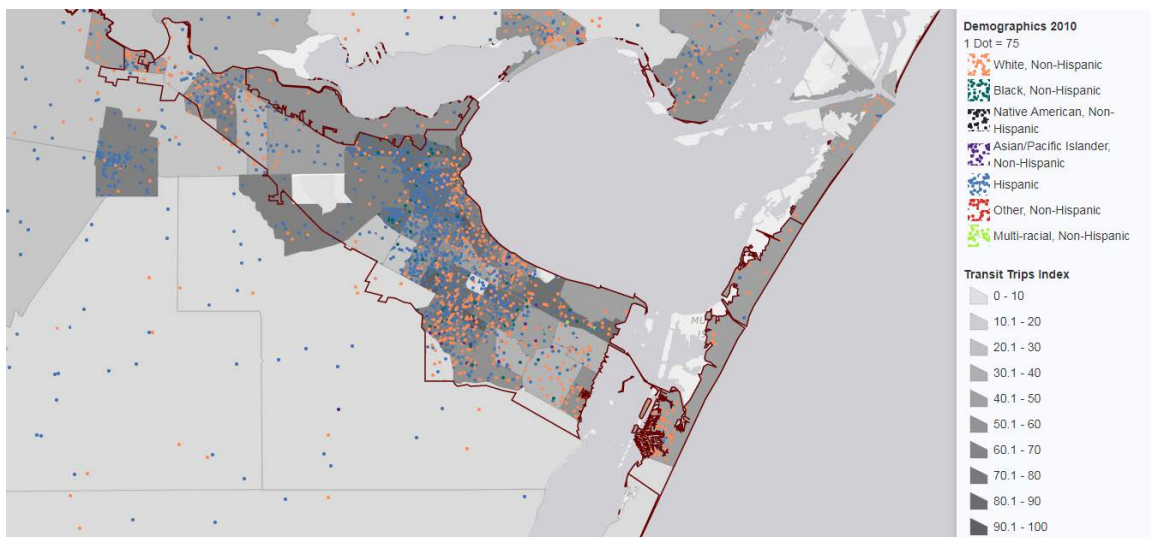


TRANSPORTATION OPPORTUNITIES

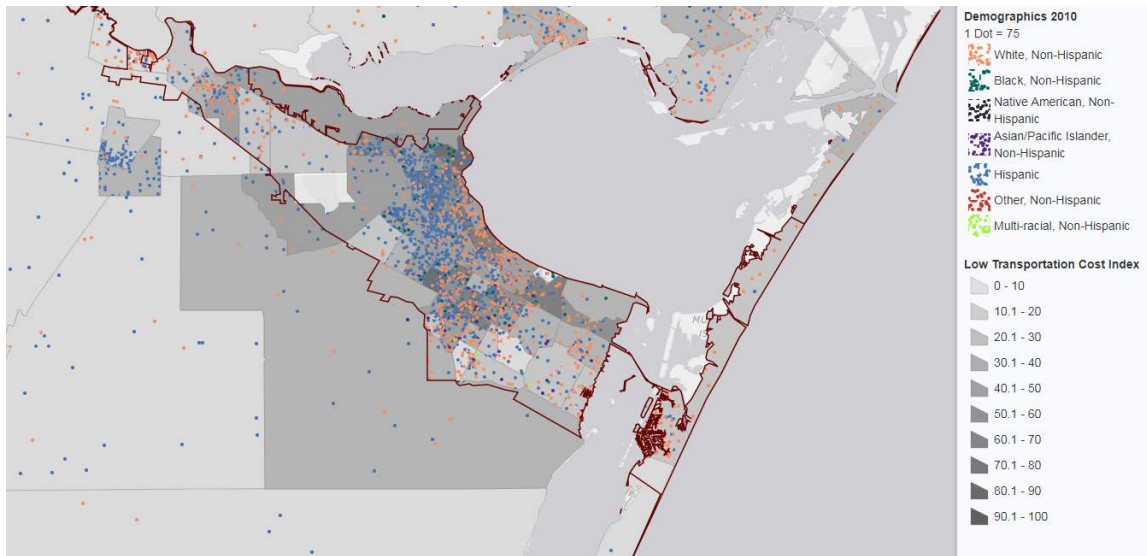
a) Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

HUD Map 11.1 indicates that transportation costs are highest in City Council Districts 4, in portions of District 5 (southeast of the city center), and in portions of District 1 (near the west end of the city). HUD Map 10.1 indicates that residents in these areas are also the least likely to use public transportation.

HUD Map 10.1 Transit Trips by Race and Ethnicity



HUD Map 11.1 Transportation Cost by Race and Ethnicity



b) Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

Five-year estimates from the ACS (2011-15), available in Table V-4 below, indicate that most workers in Corpus Christi commute to work in a private vehicle (92.3 percent), with 11.5 percent of these commuters carpooling with others. Public transportation is used by very few workers. Most resident workers work within the city of Corpus Christi. The mean travel time to work is 19.5 minutes, with less than 20 percent of workers commuting more than 30 minutes to work.

HUD Table 12 at the beginning of this chapter indicates that among the general population, Asian and Pacific Islander residents and Non-Hispanic White residents live in areas with the highest transportation costs. Black residents have the greatest access to neighborhoods with low transportation costs. Among the population living below the federal poverty line, Non-Hispanic White residents have the least access to neighborhoods with low transportation costs. Within this population, Native American and Asian or Pacific Islander residents have the greatest access to neighborhoods with low transportation costs.

HUD Table 12 also indicates that among the general population, Asian or Pacific Islander residents and Non-Hispanic White residents are least likely to use public transportation. Black residents are most likely to use public transportation, followed by Hispanic and Native American residents. Among the population living below the federal poverty line, Native American residents are the most likely to use public transportation, and Non-Hispanic White residents are the least likely to

use public transportation. Asian and Pacific Islander residents in this income bracket are much more likely to use public transportation than in the general population.

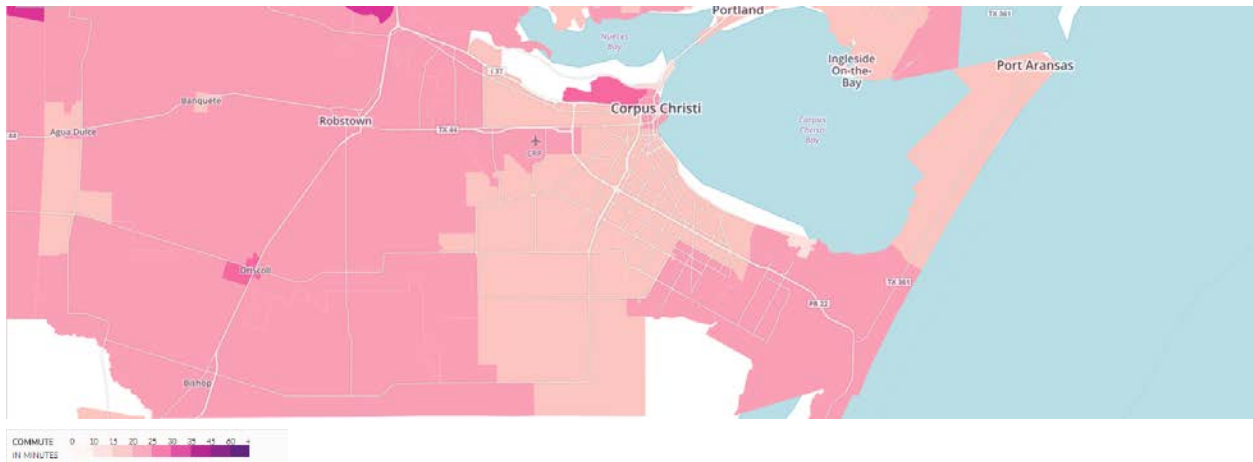
Table V-4 Commuting Patterns

Corpus Christi city, Texas	Estimate
Workers 16 years and over	145,643
Workers 16 years and over who did not work at home	142,676
MEANS OF TRANSPORTATION TO WORK	
Car, truck, or van	92.3%
In 2-person carpool	9.0%
In 3-person carpool	1.5%
In 4-or-more person carpool	1.0%
Workers per car, truck, or van	1.1%
Public transportation (excluding taxicab)	1.7%
Walked	1.8%
Bicycle	0.3%
Taxicab, motorcycle, or other means	1.9%
Worked at home	2.0%
PLACE OF WORK	
Worked in place of residence	89.2%
Worked outside place of residence	10.8%
TRAVEL TIME TO WORK	
Less than 10 minutes	14.5%
10 to 14 minutes	20.5%
15 to 19 minutes	24.0%
20 to 24 minutes	18.4%
25 to 29 minutes	4.9%
30 to 34 minutes	9.0%
35 to 44 minutes	2.2%
45 to 59 minutes	3.0%
60 or more minutes	3.4%
Mean travel time to work (minutes)	19.5

Data Sources: ACS five-year estimates 2011-2015

Calculations to determine which neighborhoods have low transportation costs may be driven by a number of factors, including availability of public transit, housing density, and proximity to employment and services. The correlation between the availability of public transportation and transportation costs in Corpus Christi suggest that access to public transit may play a substantial role in driving down the cost calculation. Considering that only 1.7 percent of workers in Corpus Christi commute using public transportation, relatively greater access to neighborhoods with low transportation costs may not represent a significant advantage. Additionally, ACS (2006-11) estimates (see Map V-2) indicate that the difference in average commute times between workers near the city center and those in the southeast of the city is less than five minutes.

Map V-2 WNYC Commute Time Heat-map

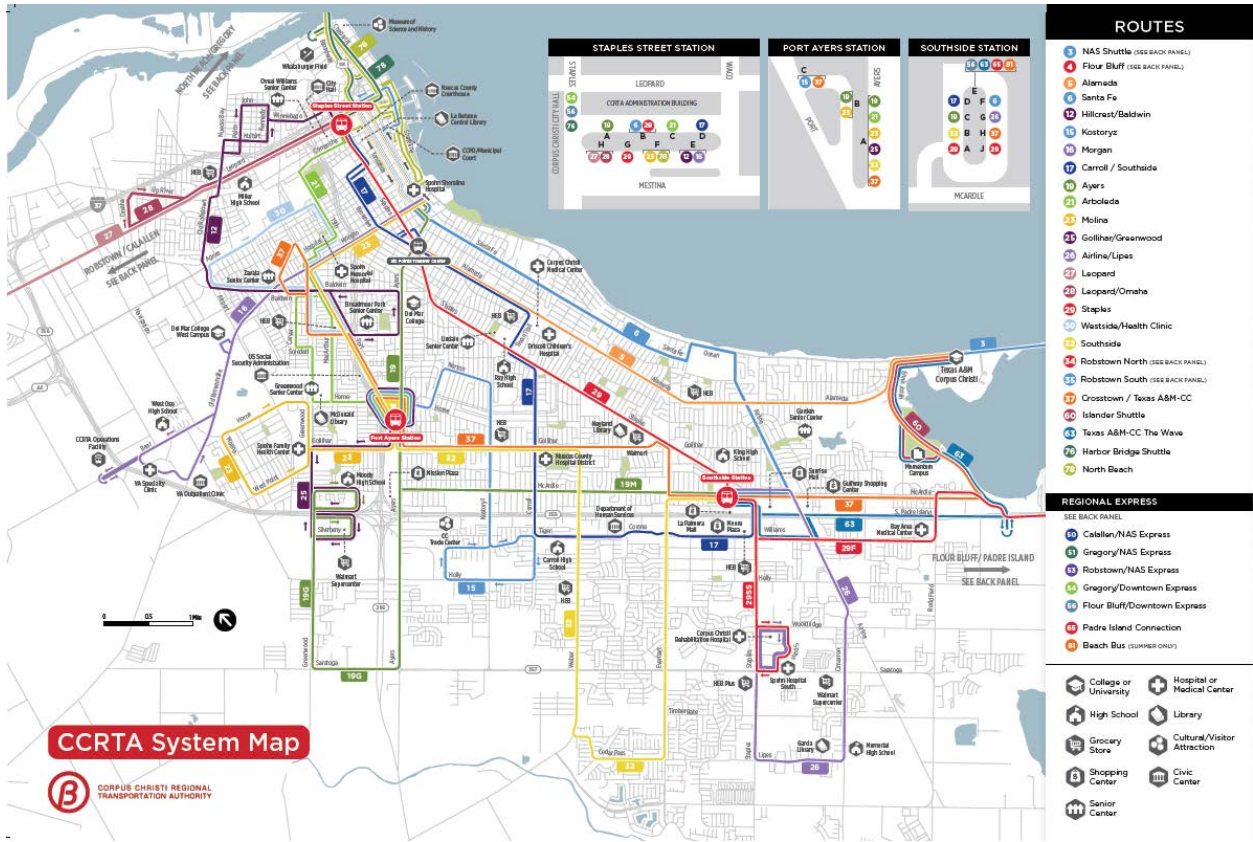


Source: WNYC using 2006-11 ACS five-year estimates.

c) Describe how the jurisdiction’s and region’s policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

Map V-3 of the Corpus Christi Regional Transportation Authority (CCRTA) system shows that the 25 available local bus routes primarily serve the central area of the city, including the east end of District 1 and District 2. Seven routes serve the east side of District 3, seven routes serve the northeast portion of District 4, and three routes serve District 5. In addition, CCRTA offers seven regional routes with service to some outlying areas of Districts 1, 3, and 4. Large parts of Districts 4 and 5 have no public transportation coverage. The availability of public transportation is consistent with the distribution of transportation cost and transit use described above.

Map V-3 CCRTA Service

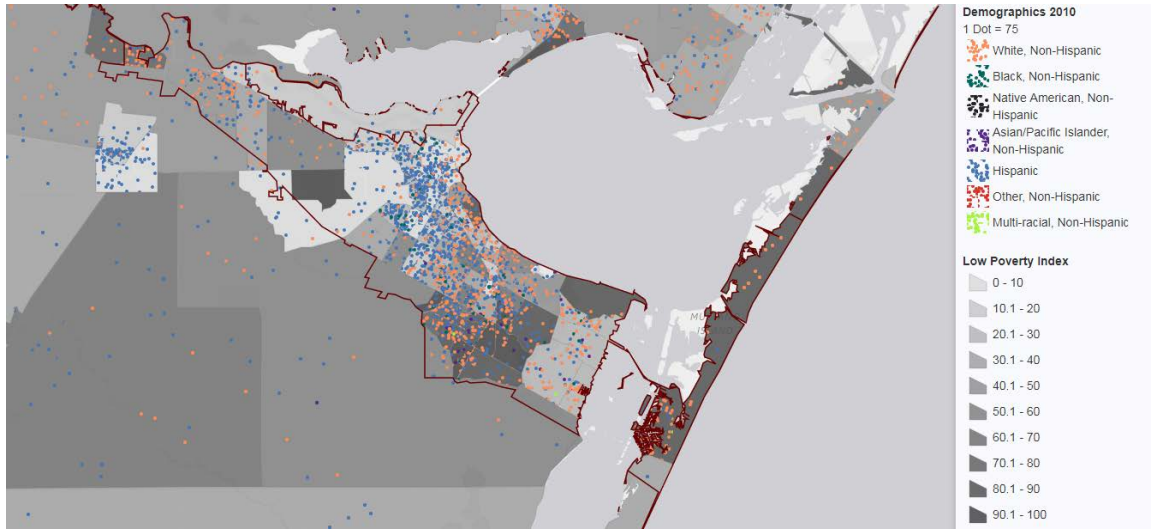


LOW POVERTY EXPOSURE OPPORTUNITIES

a) Describe any disparities in exposure to poverty by protected class groups.

HUD Table 12 at the beginning of the chapter and HUD Map 12.1 below show that among the general population, Black and Hispanic residents of Corpus Christi have the highest exposure to poverty. Regardless of poverty status, Asian and Pacific Islander residents have the greatest access to low poverty neighborhoods of any racial or ethnic group. Among the population living below the federal poverty line, Native American, Black, and Hispanic residents experience similarly high exposure to poverty.

HUD Map 12.1 Low Poverty Exposure by Race and Ethnicity



According to five-year estimates from the 2011-15 ACS, available in Table V-5 below, Black residents are more likely than the general population to experience all levels of poverty. American Indian or Alaska Native residents and Hispanic residents are also more likely than the general population to experience poverty.

Table V-5 Poverty by Race/Ethnicity

Subject	Total	<50% Poverty Level	<100% Poverty Level	<125% Poverty Level
Population for whom poverty status is determined	293,478	7.5%	17.5%	23.2%
One race	287,423	7.3%	17.4%	23.0%
White	240,504	7.0%	16.6%	22.3%
Black or African American	12,430	10.3%	24.5%	32.0%
American Indian and Alaska Native	1,058	15.5%	26.4%	31.5%
Asian	4,962	9.5%	16.9%	18.4%
Native Hawaiian and Other Pacific Islander	55	0.00%	0.00%	0.0%
Some other race	28,414	9.0%	22.8%	28.6%
Two or more races	6,055	15.8%	24.9%	35.0%
Hispanic or Latino origin (of any race)	173,337	8.8%	21.0%	27.6%
White alone, not Hispanic or Latino	100,210	4.6%	10.0%	14.0%

Data Sources: ACS five-year estimates 2011-2015

b) What role does a person’s place of residence play in their exposure to poverty?

Data from the U.S. Census 2011-2015 five-year estimates, shown in Table V-6 below, show that residents of District 1 experience the highest poverty of other districts. The data show that residents of Districts 2 and 3 also experience much higher poverty rates than residents of Districts 4 and 5. Black and Hispanic residents are concentrated near the city center in Districts 1, 2, and 3, while Non-Hispanic white residents and Asian or Pacific Islander Residents are concentrated in Districts 4 and 5, to the southeast of the city center.

Table V-6 Poverty by City Council District

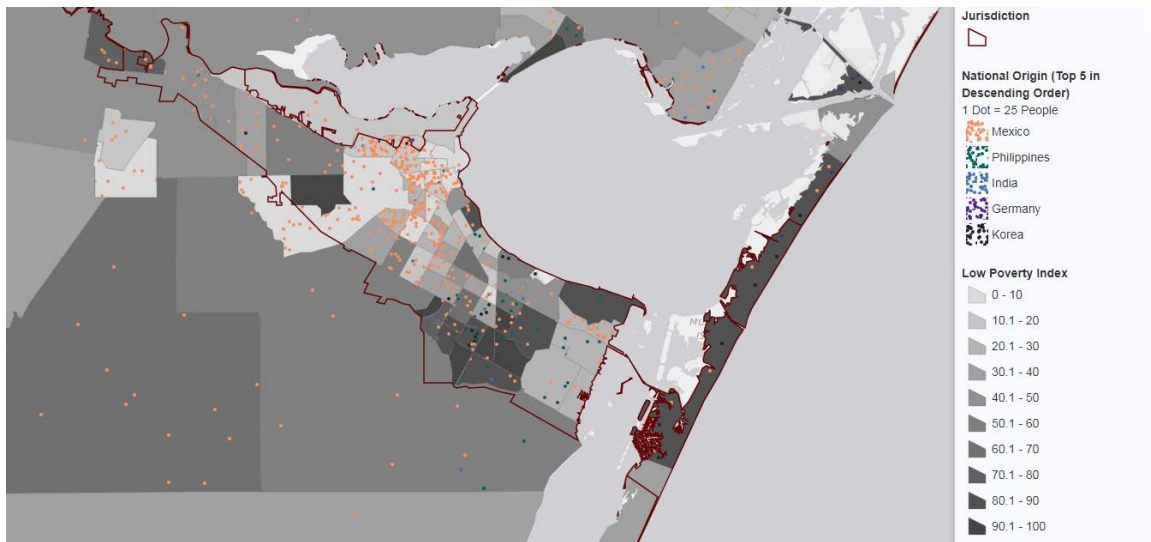
Council District	Total families	Families below poverty level	Poverty Rate
1	11,196	2,596	23.19%
2	11,864	2,142	18.05%
3	16,388	3,510	21.42%
4	13,614	1,637	12.02%
5	15,675	765	4.88%

Data Source: 2011-2015 ACS

c) Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

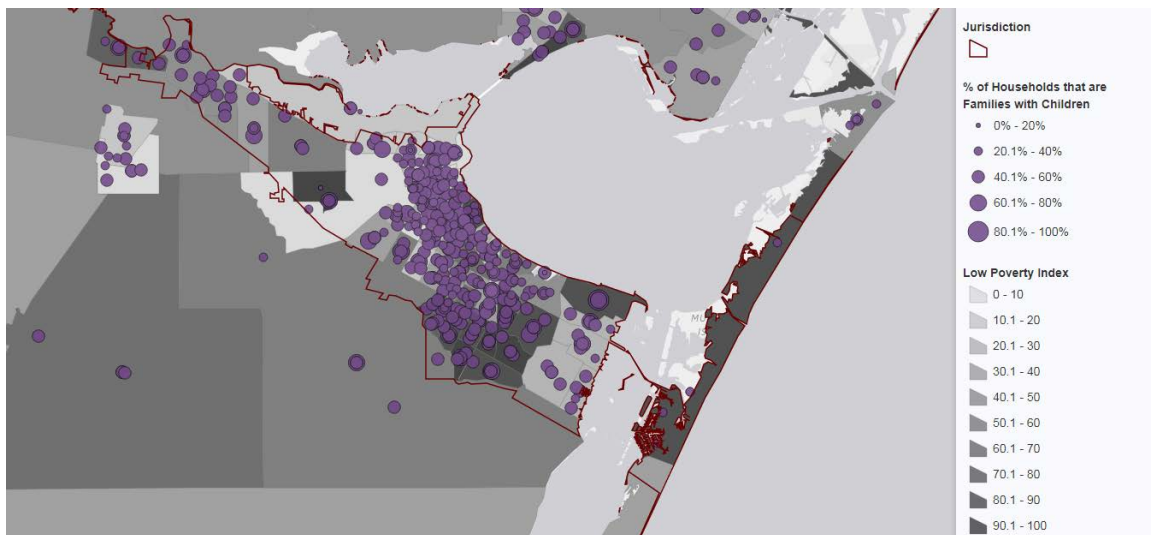
HUD Map 12.2 of access to low-poverty neighborhoods and national origin indicates that residents from Mexico are concentrated in neighborhoods with greater exposure to poverty, while residents from the Philippines, India and Korea are concentrated in neighborhoods with lower exposure to poverty.

HUD Map 12.2 Low Poverty Exposure by National Origin



HUD Map 12.3 below, showing poverty exposure and family status, does not clearly indicate that families with children as a group experience a disparity in access to low-poverty neighborhoods.

HUD Map 12.3 Low Poverty Exposure by Family Status



d) Describe how the jurisdiction’s and region’s policies affect the ability of protected class groups to access low poverty areas.

The City of Corpus Christi has adopted language in the City Code of Ordinances that promotes the ability of protected class residents to access low poverty areas by prohibiting discriminatory housing practices and requiring the adoption of procedures that promote access to housing. The City Code of Corpus Christi declares that it is “the inalienable right of each individual to provide

for himself and his/her family a dwelling according to his/her choosing”, that it is “within the power and proper responsibility of government to prevent” the denial of this right and that it is “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/her race, color, sex, religion, disability, familial status, or national origin.” These policies enable the City of Corpus Christi to enforce fair housing violations at the local level.

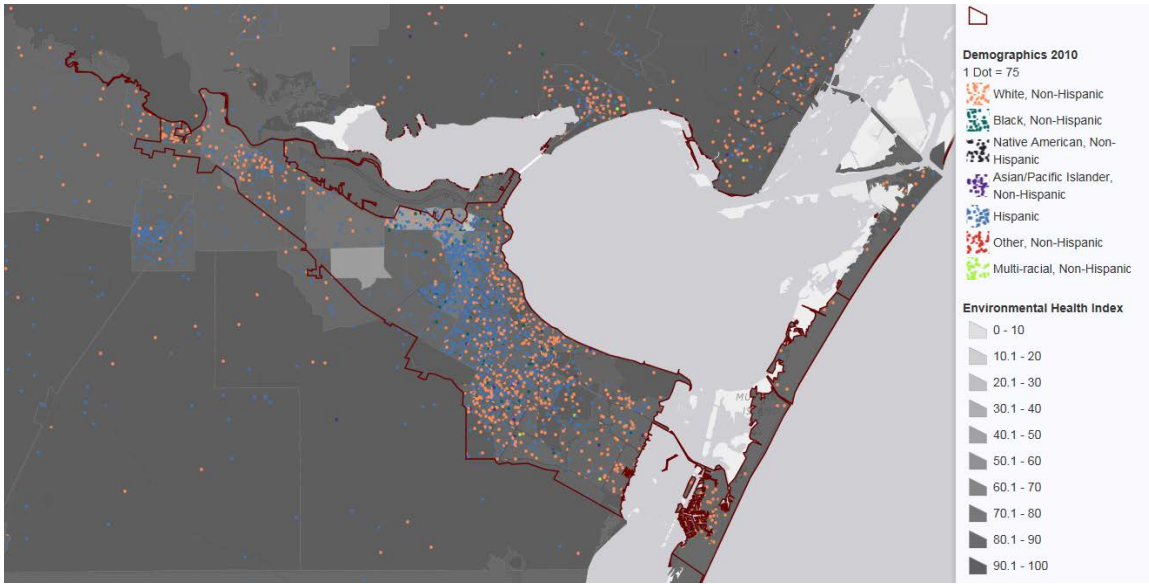
In 2015, the Texas state legislature passed Texas Senate Bill 267 barring cities from instituting laws banning landlords from discrimination based on source of income. According to a 2017 article in the Houston Chronicle, housing policy experts widely view such legislation as a barrier to integration and de-concentration of poverty. The law is currently being challenged in the U.S. District Court for the Northern District of Texas for possible violation of the Fair Housing Act by blocking predominantly Black public housing voucher holders from securing housing in predominately Non-Hispanic White neighborhoods. According to the 2013-2017 Corpus Christi Consolidated Plan, 75 percent of voucher holders in Corpus Christi are Hispanic, suggesting that this law prevents Hispanics from securing housing in predominately Non-Hispanic White neighborhoods in Corpus Christi.

ENVIRONMENTALLY HEALTHY NEIGHBORHOOD OPPORTUNITIES

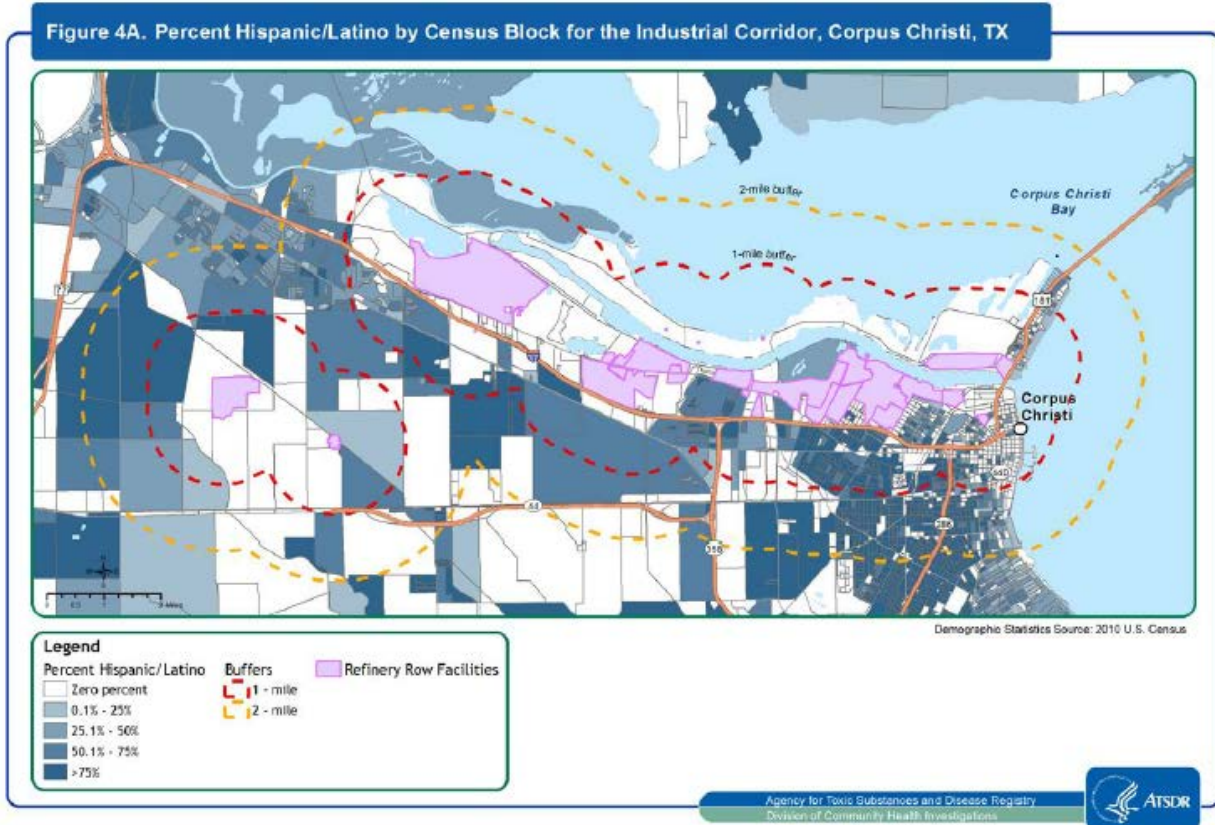
a) Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

HUD Map 13.1 of the environmental health index shows that environmental quality is lower in neighborhoods near the industrial zone called “refinery row”, south of Nueces Bay and outside the city limits north of City Council District 1 and in the vicinity of the airport. Additional data found in a 2016 public health assessment conducted by the Agency for Toxic Substances and Disease Registry (ATSDR) on the refinery row area confirms this (see Map V-4). The report found that 21,684 individuals reside within one mile of the refinery row industrial corridor, 68 percent of whom are Hispanic or Latino. The report concludes that benzene, hydrogen sulfide, particulate matter, and sulfur dioxide rarely reach levels associated with harmful acute health effects. On these occasions, breathing the maximum levels detected could result in adverse health effects, especially for children, older adults, and those with preexisting health conditions. The report also concludes that long-term exposure to the average levels of benzene, cadmium, chromium, 1,2-dibromoethane, and naphthalene together would result in increased risk of cancer. Affected neighborhoods include the historically Black neighborhoods of Hillcrest and Washington-Coles.

HUD Map 13.1 Environmental Health by Race and Ethnicity



Map V-4 ASTDR Refinery Row Industrial Corridor



b) Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

Among the general population, Black residents have the least access to environmentally healthy neighborhoods, followed by Hispanic residents. Asian or Pacific Islander residents have the greatest access to environmentally healthy neighborhoods. The pattern of access to environmentally healthy neighborhoods among racial and ethnic groups is the same for the population living below the federal poverty line.

PATTERNS IN DISPARITIES IN ACCESS TO OPPORTUNITY

c) Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

According to HUD Table 12, among the general population, Black and Hispanic residents of Corpus Christi have the least access to opportunity in four of the seven categories, experiencing high exposure to poverty, less access to proficient schools, lower labor market engagement, and less access to environmentally healthy neighborhoods. Non-Hispanic White residents and Asian or Pacific Islander residents are least likely to use public transportation and have the least access to neighborhoods with low transportation costs and nearby job opportunities. This pattern is consistent with the pattern of racial and ethnic segregation visible in HUD Map 1 at the beginning of the chapter. Black and Hispanic residents are concentrated near the city center in Districts 1, 2, and 3, while Non-Hispanic White residents and Asian or Pacific Islander residents are concentrated in Districts 4 and 5, to the southeast of the city center. Districts 1, 2, and 3 have lower school proficiency and labor market engagement and higher exposure to poverty. These districts are also closer to the industrial corridor along the Nueces Bay, providing closer proximity to job opportunities but also lower environmental health. CCRTA service has low penetration in Districts 4 and 5. Differences among racial and ethnic groups in exposure to poverty, proficient schools, and areas of high labor market engagement are much greater in magnitude than are the differences in transit use, job proximity, and transportation cost. The comparatively small differences in transit use, job proximity, and transportation cost are consistent with ACS data on the low utilization of public transportation overall and a difference in average commute times of less than five minutes between workers in the city center and those in Districts 4 and 5.

Table V-7 Disparities in Opportunity Indicators

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
Most disadvantaged group	Black, Non-Hispanic	Hispanic	Black, Non-Hispanic	White, Non-Hispanic	Asian or Pacific Islander	Asian or Pacific Islander	Black, Non-Hispanic
Disparity as compared with most advantaged group	-25.87	-28.78	-26.99	-6.49	-7.91	-7.99	-14.75
Second most disadvantaged group	Hispanic	Black, Non-Hispanic	Hispanic	Asian or Pacific Islander	White, Non-Hispanic	White, Non-Hispanic	Hispanic
Disparity as compared with most advantaged group	-25.29	-27.24	-25.01	-5.53	-7.67	-3.30	-10.31
Population below federal poverty line							
Most disadvantaged group	Black, Non-Hispanic	Black, Non-Hispanic	Black, Non-Hispanic	White, Non-Hispanic	White, Non-Hispanic	Native American	Black, Non-Hispanic
Disparity as compared with most advantaged group	-23.01	-27.01	-32.45	-10.77	-11.50	-6.91	-16.15
Second most disadvantaged group	Native American	Hispanic	Hispanic	Hispanic	Hispanic	White, Non-Hispanic	Hispanic
Disparity as compared with most advantaged group	-20.96	-26.20	-29.04	-4.55	-6.42	-3.18	-11.54

Data Source: Morningside Research and Consulting calculations computed from HUD Table 12.

As shown on HUD Map 1, the City of Corpus Christi has seven census tracts designated as racially or ethnically concentrated areas of poverty (R/ECAPS). These are census tracts 5, 9, 10, 11, 12, 15, and 33.05. Six of these are located near the city center in Districts 1 and 2 (5, 9, 10, 11, 12 and 15); the seventh is at the southeast end of District 3 (tract 33.05). Five-year estimates from the ACS (2011-15) show that much higher percentages of families in Districts 1, 2 and 3 live below the federal poverty line (18 percent to 23 percent) compared with Districts 4 (12 percent) and 5 (5 percent). ACS estimates also indicate that Black, Hispanic, and American Indian residents are more likely than the general population to live below the federal poverty line. According to HUD Table 12, among residents living below the federal poverty line, Black residents have the least access to neighborhoods with low levels of poverty, proficient schools, areas with high labor market engagement, and environmentally healthy neighborhoods. Within this income group,

Hispanic residents experience substantial disparities in access to proficient schools, areas with high labor market engagement, and environmental health.

ADDITIONAL INFORMATION

a) Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

The Hillcrest and Washington-Coles neighborhoods are located on the north side of Corpus Christi in City Council District 1. The neighborhoods are located in census tracts 5 and 64, respectively. Census tract 5 is a HUD-designated R/ECAP. According to the Texas Low Income Housing Information Service, these neighborhoods “have a deep history of segregation, isolation and decline.” Washington Coles was the first neighborhood designated for Black residents in the city under Jim Crow segregation, and neighboring Hillcrest was opened to Black residents in 1944. Historic segregation of these neighborhoods was further reinforced in the 1950s by the routing of Interstate Highway 37, which isolated these neighborhoods from the rest of the city. In 2007, the major oil company CITGO was criminally indicted for violating the Clean Air Act by storing oil in uncovered tanks and exposing Hillcrest residents to benzene and other chemicals. After this incident, Hillcrest residents became the first group designated as victims of an air pollution crime under the Crime Victims’ Rights Act.

The proposed path for the new Harbor Bridge (see Map V-5) cuts through the Washington-Coles neighborhood. Hillcrest and Washington-Coles residents filed a Title VI civil rights complaint to the Federal Highway Administration, alleging that the “Texas transportation agency is perpetuating discrimination against the minority neighborhoods, has selected a route that has a disparate impact on people of color, and has denied residents adequate participation.”¹¹ The complaint resulted in a multi-million dollar settlement focused on enhanced mitigation options for affected residents.

¹¹ Texas Rio Grande Legal Aid, INC. Complaint under Title VI of the Civil Rights Act of 1964. Austin, Texas: March 5, 2015

Map V-5 Proposed Harbor Bridge Alignment Path



- b) The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).**

The City of Corpus Christi has a fund, called the Type A Fund, which receives one-eighth of a cent of sales tax designated for economic and job growth. This fund includes the Homebuyer Assistance Program, which provides eligible homebuyers up to \$10,000 for down payment assistance. For the past two years a portion of the Type A Fund was given to the Corpus Christi Housing Authority (CCHA) to rehabilitate one of their public housing complexes and bring seven previously unusable units back into the market.

The city enforces and encourages participation in the Section 3 program on all HUD funded projects. The Section 3 program requires that recipients of HUD financial assistance provide job training, employment, and contracting opportunities for residents in low- and very-low income neighborhoods.

The city awards CDBG funds to organizations such as Coastal Bend Center for Independent Living (CBCIL) to assist people with disabilities with ramps and accessible bathrooms and the Corpus Christi Area Council for The Deaf and Hard of Hearing Center to increase their building space by 50 percent. The additional space will help the agency provide enhanced programs and services to their residents. The city also plans to provide CDBG funding for accessible routes in residential

areas that do not have sidewalks but have heavy pedestrian traffic. This project will build approximately 2,300 linear feet of five-foot-wide sidewalk and 15 Americans with Disabilities Act (ADA) compliant curb ramps. This will allow pedestrians with and without disabilities to travel this area safely without architectural barriers.

CONTRIBUTING FACTORS

Discussing any contributing factors of disparities in access to opportunity:

- **Access to financial services**
- **The availability, type, frequency, and reliability of public transportation**
- **Lack of private investments in specific neighborhoods**
- **Lack of public investments in specific neighborhoods, including services or amenities**
- **Lack of regional cooperation**
- **Land use and zoning laws**
- **Lending Discrimination**
- **Location of employers**
- **Location of environmental health hazards**
- **Location of proficient schools and school assignment policies**
- **Location and type of affordable housing**
- **Occupancy codes and restrictions**
- **Private discrimination**
- **Other**

The following are contributing factors to disparities in access to opportunity in Corpus Christi listed in priority order.

LOCATION AND TYPE OF AFFORDABLE HOUSING

Stakeholders agree that Corpus Christi has a shortage of affordable housing for both renters and homebuyers, and the public housing authority in Corpus Christi has a waiting list of over 1,000 people. Stakeholders say that currently, most affordable housing in Corpus Christi is concentrated on the north side, an area with a higher concentration of African American residents than the rest of the city, and on the west side, an area with a higher concentration of low-income Latino/Hispanic residents who are likely to be first or second-generation Americans or speak primarily Spanish. Affordable housing is not thought to be available on the south side or on the portion of North Padre Island located within Council District 4.

LOCATION OF EMPLOYERS

Employers are mostly located on the north and northwest side of the city along Interstate 37. Neighborhoods in this area are predominately home to Black and Latino/Hispanic residents,

giving these groups the highest job proximity indices of any race or ethnicity (50.3 and 49.4, respectively). Asian and Pacific Islander residents, including residents from the Philippines, India, and Korea, predominately live in City Council District 5, an area with lower job proximity. According to HUD data, areas of Corpus Christi with high job proximity are generally associated with lower school proficiency.

LOCATION OF ENVIRONMENTAL HEALTH HAZARDS

Corpus Christi is an area with heavy industry including refineries and chemical plants. Stakeholders say that neighborhoods on the north and west side in close proximity to industry have issues with decreased property value and health concerns related to air and soil quality. A public health assessment conducted by the Agency for Toxic Substances and Disease Registry (ATDSR) found that 21,684 individuals (68 percent of whom are Hispanic) reside within one mile of the “refinery row”, south of Nueces Bay and north of City Council District 1. The report concludes that long term exposure to average levels of benzene, cadmium, chromium, 1,2-dibromoethane, and naphthalene together would result in increased risk of cancer. Affected neighborhoods include the historically African American neighborhoods of Hillcrest and Washington-Coles.

LOCATION OF PROFICIENT SCHOOLS AND SCHOOL ASSIGNMENT POLICIES

According to stakeholders, most Corpus Christi residents would like to live close to the good school districts on the south side of Corpus Christi, but many jobs are concentrated in the north and northwest parts. The most recent enrollment data indicate that Calallen High School, located in the northwest District 1, a more diverse area, has a 58 percent minority enrollment (majority Hispanic), and Flour Bluff High School, located in the southeast District 4, has a 46 percent minority enrollment (majority Hispanic). HUD data shows that residents of Mexican origin are concentrated in census tracts with lower school proficiency. Moreover, large percentages of Hispanic families with children live in these census tracts.

LACK OF REGIONAL COOPERATION

Community opposition to affordable housing exists in certain areas of Corpus Christi, such as Calallen in the northwest and on the south side. Stakeholders say that public officials have not made adequate efforts to educate communities on the benefits of affordable housing before launching a project. In addition, community engagement and communication relating to the Harbor Bridge project was considered inadequate by some stakeholders. Stakeholders believe the city continues to neglect the needs of effected north side residents who plan to stay in the neighborhood rather than relocating. The resettlement assistance from TxDOT is voluntary and stakeholders believe the city has not made sufficient efforts to collaborate with residents who will stay in the neighborhood to improve conditions in the neighborhood. Stakeholders also observe a gap in communication with public housing residents. For example, after the demolition

of D.N. Leathers, a public housing complex in the Hillcrest neighborhood in north Corpus Christi, stakeholders believe CCHA provided inadequate mobility counseling for residents who were displaced. Residents in the complex received tenant-based vouchers for relocation but experienced issues using the vouchers, such as receiving an outdated list of apartments accepting vouchers. Access to environmentally healthy neighborhoods is significantly impacted by industrial activity that takes place just outside the city limits. Collaboration between the city, the private sector, the state, and the county is necessary to ensure that residents near the industrial corridor have access to environmentally healthy neighborhoods.

PRIVATE DISCRIMINATION

While not statistically significant, comments received from stakeholders during interviews, focus groups, and survey responses, suggest that private discrimination based on protected class occurs in the City of Corpus Christi. Nine individuals indicated that private discrimination based on protected class were priority fair housing issues in an exercise conducted during focus groups and the public meeting. In the resident survey, seven respondents believe that they were turned down for a mortgage based on familial status, religion, race, or sex. Fifteen residents say their real estate agent did not show them all of the places they were interested in when looking for a house or condo to buy.

Twelve survey respondents believe their rental applications were turned down for discriminatory reasons, on the basis of familial status, disability, race, or color. Others believe it was because of ethnicity. One respondent writes, “When I called and used my Spanish surname I was told there were no units, 5 minutes later, using my Anglo maiden name, I was offered the apartment.” Nine respondents explicitly stated that they have been discriminated against regarding access to housing, based on familial status, disability, race/ethnicity, or color.

SOURCE OF INCOME DISCRIMINATION

Texas Senate Bill 267, passed May 23, 2015 and signed into law on June 19, 2015, prevents municipalities from passing ordinances which prohibit source of income discrimination in rental housing. Stakeholders report that tenant-based vouchers are frequently turned down because landlords do not accept vouchers as a form of payment. According to the 2013-2017 Corpus Christi Consolidated Plan, 75 percent of voucher holders in Corpus Christi are Hispanic, suggesting that this form of discrimination creates a disparate impact on individuals who are Hispanic. In a specific example, when D.N. Leathers, a public housing project, was recently demolished in a predominately African American community, residents faced difficulty in finding apartments that would accept vouchers, especially on the south side. Because of this, many are still forced to live in areas with low access to proficient schools and other public services.

LOSS OF AFFORDABLE HOUSING

The proposed Harbor Bridge project has led to displacement of residents from the 122-unit D.N. Leathers public housing project. Despite financial efforts made by state officials to help these residents relocate, a shortage of public housing and the reluctance of private landlords to accept tenant-based vouchers has led to loss of public housing for many residents. Moreover, disputed state laws protect landlords from refusing to rent to voucher households, which limits the supply of available units in the housing choice voucher program.

AVAILABILITY, TYPE, FREQUENCY, AND RELIABILITY OF PUBLIC TRANSPORTATION

The Corpus Christi Regional Transportation Authority operates 25 local bus routes which offer services to most districts in the central, east, and northeast portions of the city. Although most surveyed residents (71 percent of 184 respondents) believe that they have adequate access to transportation in Corpus Christi, stakeholders say that higher travel times exist for people who live on the south side and travel to the refineries (on the north side) for work. Large areas of City Council Districts 4 and 5 are not connected to public transit networks; these areas also correspond with higher transportation costs, and most residents commute alone in their private vehicles.

V.B.IV. DISPROPORTIONATE HOUSING NEEDS

- a. **Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?**

HUD Tables 9 and 10 show the rate of housing burden for households in Corpus Christi by race/ethnicity and family status. According to the U.S. Department of Housing and Urban Development (HUD), housing burden occurs when a living unit has any one of the following conditions: Incomplete kitchen facilities, incomplete plumbing, overcrowding (more than one person housed per bedroom), or a housing cost burden in which monthly housing costs, including utilities, exceed 30 percent of monthly household income.¹² Severe housing burden is defined the same as above, but with a housing cost burden in which monthly housing costs, including utilities, exceed 50 percent of monthly household income.¹³

Black residents are most likely to experience housing burden in Corpus Christi, followed by households in the “Other, Non-Hispanic” category. Asian/Pacific Islander and Hispanic residents experience housing burden at slightly lower rates. Native American residents are the only racial or ethnic group that experiences a lower rate of housing burden in Corpus Christi than in the region as a whole. These racial and ethnic differences are the same for households with severe housing burden.

In terms of household type and size, households that have five or more family members are much more likely to experience housing burden than smaller families. Both family and non-family households, regardless of size or familial status, experience more housing burden in the City of Corpus Christi than in the larger region (Nueces and San Patricio counties).

HUD Table 10 shows the demographics of households experiencing severe housing cost burden. These data follow the same general trends as HUD Table 9, with Black residents experiencing the highest rate of severe cost burden. Comparing HUD Tables 9 and 10 shows that of the 20,405 households who experience severe housing burden, 15,905 households experience severe cost burden, while the other 4,500 experience some combination of the other problems: Incomplete kitchen facilities, incomplete plumbing, or more than one person per bedroom. For family households with five or more people, the rate of severe cost burden is notably low as compared with the rate of housing burden in general; large family households are less likely to be severely cost burdened than non-family households and only slightly more likely to be severely cost

¹² *Affirmatively Furthering Fair Housing (AFFH) Data Documentation*. U.S. Department of Housing and Urban Development, July 2016. p. 11. PDF File. Web. <https://www.hudexchange.info/resources/documents/AFFH-Data-Documentation.pdf>. Accessed September 2017.

¹³ *Affirmatively Furthering Fair Housing (AFFH) Data Documentation*. U.S. Department of Housing and Urban Development, July 2016. p. 11. PDF File. Web. <https://www.hudexchange.info/resources/documents/AFFH-Data-Documentation.pdf>. Accessed September 2017.

burdened than small family households. This suggests that many large family households experience housing burden not because of severe cost but because they have more than one person per bedroom.

Each of the HUD tables and maps in this report are numbered according to the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

HUD Table 9 Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	Corpus Christi, Texas			Corpus Christi, Texas Region		
Households Experiencing any of Four Housing Problems	Number with Problems	Number of Households	Percent with Problems ¹	Number with Problems	Number of Households	Percent with Problems
Race/Ethnicity						
White, Non-Hispanic	13,590	44,940	30.24%	20,335	68,239	29.80%
Black, Non-Hispanic	2,295	4,915	46.69%	2,527	5,450	46.37%
Hispanic	22,200	58,760	37.78%	28,760	78,115	36.82%
Asian or Pacific Islander, Non-Hispanic	744	1,944	38.27%	853	2,262	37.71%
Native American, Non-Hispanic	29	249	11.65%	44	342	12.87%
Other, Non-Hispanic	434	947	45.83%	588	1,470	40.00%
<i>Total</i>	39,280	111,750	35.15%	53,105	155,900	34.06%
Household Type and Size						
Family households, <5 people	17,970	62,160	28.91%	25,040	89,499	27.98%
Family households, 5+ people	6,165	13,085	47.12%	8,420	18,245	46.15%
Non-family households	15,145	36,490	41.50%	19,655	48,145	40.82%
Households Experiencing any of Four Severe Housing Problems	Number with Severe Problems	Number of Households	Percent with Severe Problems	Number with Severe Problems	Number of Households	Percent with Severe Problems
Race/Ethnicity						
White, Non-Hispanic	6,555	44,940	14.59%	9,954	68,239	14.59%
Black, Non-Hispanic	1,140	4,915	23.19%	1,288	5,450	23.63%
Hispanic	12,080	58,760	20.56%	16,140	78,115	20.66%
Asian or Pacific Islander, Non-Hispanic	419	1,944	21.55%	484	2,262	21.40%
Native American, Non-Hispanic	0	249	0.00%	15	342	4.39%
Other, Non-Hispanic	209	947	22.07%	308	1,470	20.95%
<i>Total</i>	20,405	111,750	18.26%	28,170	155,900	18.07%

Source: Comprehensive Housing Affordability Strategy (CHAS), 2008-2012, as retrieved from the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

¹ All percentages represent a share of the total population with the jurisdiction or region, except household type and size, which is compared with total households.

HUD Table 10 Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden	Corpus Christi, Texas			Corpus Christi, Texas Region		
	Number with Severe Cost Burden	Number of Households ¹	Percent with Severe Cost Burden ²	Number with Severe Cost Burden	Number of Households	Percent with Severe Cost Burden
Race/Ethnicity						
White, Non-Hispanic	5,425	44,940	12.07%	7,965	68,239	11.67%
Black, Non-Hispanic	995	4,915	20.24%	1,074	5,450	19.71%
Hispanic	8,980	58,760	15.28%	11,210	78,115	14.35%
Asian or Pacific Islander, Non-Hispanic	330	1,944	16.98%	365	2,262	16.14%
Native American, Non-Hispanic	0	249	0.00%	15	342	4.39%
Other, Non-Hispanic	175	947	18.48%	199	1,470	13.54%
Total	15,905	111,750	14.23%	20,828	155,900	13.36%
Household Type and Size						
Family households, <5 people	7,199	62,160	11.58%	9,644	89,499	10.78%
Family households, 5+ people	1,675	13,085	12.80%	2,025	18,245	11.10%
Non-family households	7,029	36,490	19.26%	9,142	48,145	18.99%

Source: Comprehensive Housing Affordability Strategy (CHAS), 2008-2012, as retrieved from the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

¹The number of households is the denominator for the percent with problems, and may differ from the number of households for the table on severe housing problems.

²All percentages represent a share of the total population with the jurisdiction or region, except household type and size, which is compared with total households.

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

As shown in HUD Map 6.1, the areas with the highest concentration of housing burden in Corpus Christi are the north-central, west-central, and northeast areas of the city. The north-central area includes several neighborhoods designated as racially or ethnically concentrated areas of poverty (R/ECAPs) due to their high concentrations of Hispanic and Black residents and the fact that at least 40 percent of residents are below the federal poverty line. According to HUD Map 6.2, this includes many residents from Mexico.

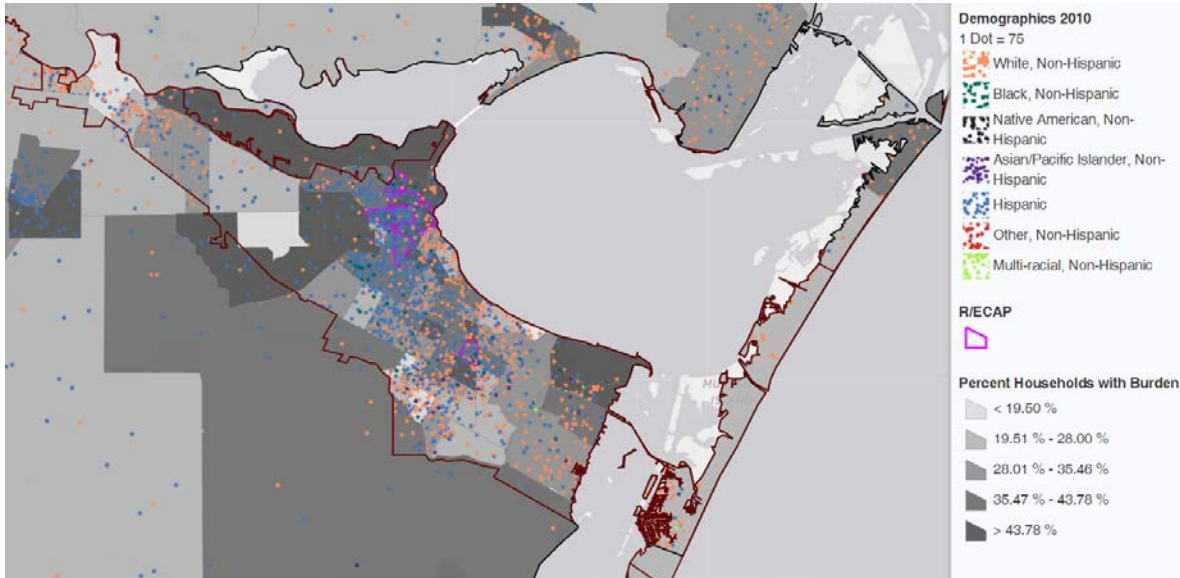
The west-central area, around Corpus Christi International Airport, has a high concentration of Hispanic residents. HUD Map 6.2 shows that this area has some residents from Mexico, but not as many as the north-central area.

The northeast area has a relatively diverse mix of Hispanic and Non-Hispanic White residents. HUD Map 6.2 shows that this area includes some residents from Mexico as well as some residents from Germany and the Philippines.

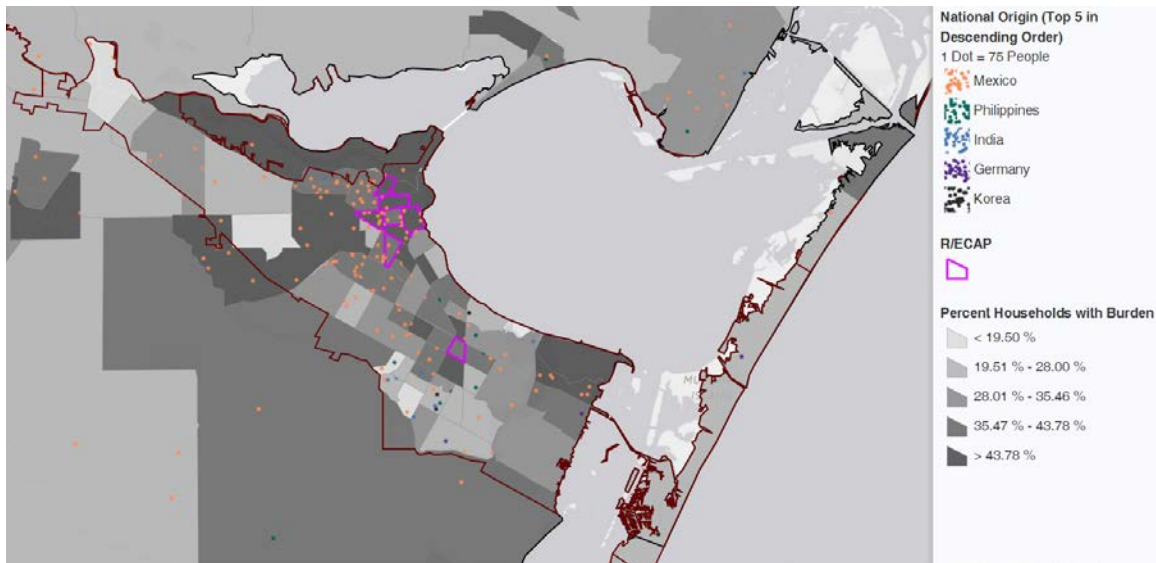
Outside of the City of Corpus Christi, the highest rates of housing burden in the region are in the western suburb of Robstown and the northeastern suburb of Portland. HUD Maps 6.1 and 6.2

show that Robstown has a high concentration of Hispanic residents and some residents from Mexico, while Portland has a relatively diverse population, including Hispanic, Non-Hispanic White, and Multi-racial (Non-Hispanic) residents, and some residents from Mexico and the Philippines.

HUD Map 6.1 Housing Burden and Race/Ethnicity



HUD Map 6.2 Housing Burden and National Origin



c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

HUD Table 11 shows the number of bedrooms and number of children for different categories of publicly supported housing in Corpus Christi. According to the table, the most common type of unit in project-based Section 8 and other multifamily housing is a unit with one or fewer bedrooms. The most common type of unit in public housing and the housing choice voucher program has two bedrooms.

Although households with children represent 60.5 percent of the households in public housing, units with three or more bedrooms make up just over one-fourth of the public housing inventory. By comparison, in the housing choice voucher program, households with children represent approximately half of all households, and units with three or more bedrooms make up about one-third of the inventory. Assuming that households with children require larger housing units, this suggests that the city does not have enough public housing units to meet the needs of large families.

**HUD Table 11 Publicly Supported Housing by Program Category:
Units by Number of Bedrooms and Number of Children**

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Public Housing	476	31.09%	644	42.06%	400	26.13%	926	60.48%
Project-Based Section 8	772	43.69%	596	33.73%	341	19.30%	799	45.22%
Other Multifamily	19	44.19%	14	32.56%	0	0.00%	0	0.00%
HCV Program	310	25.43%	440	36.10%	435	35.68%	615	50.45%

Sources: Inventory Management System (IMS)/ PIH Information Center (PIC), 2013; Tenant Rental Assistance Certification System (TRACS), 2013; as retrieved from the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

HUD Table 16 shows homeownership and rental rates by race and ethnicity in the City of Corpus Christi and the region. The table shows that Hispanic residents make up the largest cohort of homeowners in the jurisdiction. Although the table does not show homeownership rates for each group, rates can be calculated by comparing the number of owners and renters in each racial and ethnic group. These calculations indicate that the groups with the highest homeownership rates are Native American residents and Non-Hispanic White residents, and the groups with the lowest homeownership rates are Other Non-Hispanic residents and Black residents. The Corpus Christi

region has similar racial and ethnic trends, although homeownership rates in the jurisdiction are lower across all racial and ethnic groups.

HUD Table 16 Homeownership and Rental Rates by Race/Ethnicity

Race/Ethnicity	Corpus Christi, Texas				Corpus Christi, Texas Region			
	Homeowners		Renters		Homeowners		Renters	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
White, Non-Hispanic	28,130	43.94%	16,790	35.18%	45,515	47.90%	22,725	37.33%
Black, Non-Hispanic	2,020	3.16%	2,895	6.07%	2,290	2.41%	3,180	5.22%
Hispanic	32,295	50.44%	26,470	55.46%	44,930	47.28%	33,175	54.50%
Asian or Pacific Islander, Non-Hispanic	1,110	1.73%	835	1.75%	1,355	1.43%	920	1.51%
Native American, Non-Hispanic	180	0.28%	65	0.14%	264	0.28%	75	0.12%
Other, Non-Hispanic	285	0.45%	670	1.40%	670	0.71%	800	1.31%
Total Household Units	64,025	-	47,725	-	95,025	-	60,875	-

Source: U.S. Census Bureau American Community Survey, 2015.

ADDITIONAL INFORMATION

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.**
- b. **The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.**

A housing survey conducted for this AFH asked residents of Corpus Christi to report their experience with cost burden. Just over half of residents (55 percent) indicated they experience cost burden, and 31 percent indicate they are severely cost burdened. When asked about the features of their property, three respondents who are renters indicated they did not have indoor running water, which as an “incomplete plumbing facility” would qualify as a housing burden. These survey results, while not statistically significant, show higher rates of the four housing problems and severe cost burden than the rates shown in HUD Tables 9 and 10 (35 percent of all Corpus Christi residents experience one of the four housing problems and about 14 percent experience severe cost burden). According to a representative from the Texas Low Income Housing Information Service (TxLIHIS), households earning minimum wage would have to work 104 hours/week to afford the Fair Market Rent (estimated at \$19.06/hour) on a two-bedroom unit in Corpus Christi.

Victims of domestic violence often experience housing-related difficulty, with one survey of domestic violence survivors reporting that, in shelters across eight states, 84 percent of survivors needed help with finding affordable housing.¹⁴ One article in the Corpus Christi Caller Times claimed that domestic violence in Corpus Christi was “arguably worse than any other major Texas city” and noted that eight Corpus Christi residents died from domestic violence in 2015.¹⁵ The Corpus Christi Police Department Crime Victim’s Assistance Program provides housing support for victims of domestic violence. Through the program, victims of domestic violence may apply for up to \$3,800 in assistance to be used for rent, deposits, and relocation expenses. The program also conducts community outreach to apartment management and to the Corpus Christi Apartment Association.

Hurricane Harvey made landfall north of Corpus Christi in late August 2017 at the close of the AFH data collection process. The Corpus Christi Development Services Department conducted a commercial and residential damage assessment. The assessment focused on damage to structures and does not include damage to fences or downed trees. Four levels of impact were identified. One home was destroyed, 79 units received major damage, 728 units received minor damage, and an additional 1,652 units are classified as affected. No geographic patterns have been identified to date which demonstrate disparate impact from the hurricane on protected class groups.

The City of Corpus Christi Housing and Community Development Department, along with city staff from the Emergency Operations Center, have been attending ongoing meetings with regional, state, and federal officials since the arrival and departure of Hurricane Harvey. The meetings, to date, include:

- Recovery Coordination Webinar (8/28/17)
- Recovery Coordination Webinar (8/30/17)
- Recovery Coordination Meeting (9/13/17)
- Housing Recovery Call (9/14/17)
- Housing Recovery call (9/16/17)
- Functional Needs Support Team (9/18/17)
- Coastal Bend Disaster Recovery Group (9/19/17)

¹⁴ Lyon, Eleanor and Shannon Lane. *Meeting Survivors’ Needs: A Multi-State Study of Domestic Violence Shelter Experiences*. National Institute of Justice, 2008. PDF File. Web. <https://vawnet.org/sites/default/files/materials/files/2016-08/MeetingSurvivorsNeeds-FullReport.pdf>. Accessed September 22, 2017.

¹⁵ Torralva, Krista. “Corpus Christi struggles to overcome domestic violence.” *Archive.caller.com*. Corpus Christi Caller Times, December 5, 2015. Web. <http://archive.caller.com/news/behind-broken-doors/corpus-christi-struggles-to-overcome-domestic-violence-22b45aa4-dd63-30a0-e053-0100007f4e22-360597061.html>. Accessed September 27, 2017.

- Recovery Coordination Webinar (9/27/17, 9/29/17)
- Hurricane Housing Recovery (9/28/17)
- Housing /Hurricane Harvey (10/2/17)
- Recovery Coordination Webinar (10/2/17)
- Recovery Coordination Webinar (10/6/17)
- Functional Needs Support Team (10/9/17)
- Coastal Bend Disaster Recovery Group (10/10/17)
- Functional Needs Support Team (10/16/17)
- Congressional Staff Harvey Recovery Meeting (10/16/17)
- Functional Needs Support Team (10/23/17)
- Recovery Statewide Conference call (10/27/17)
- House Appropriations Committee Meeting (11/8/17)
- Disaster Housing Recovery call (11/16/17)
- Coastal Bend Disaster Recovery Group (11/28/17)
- Rebuild Texas Regional Meeting (11/30/17)
- Urban Affairs Committee (12/4/17)

Primary topics include changes in demand for affordable housing and the needs of individuals experiencing homelessness prior to the hurricane as well as after. Conversations and preliminary data continue to show that the Corpus Christi community received major wind damage as well as some infrastructure damage caused by Hurricane Harvey. Discussion on these topics is scheduled to continue onto the Spring and housing issues are being addressed by the various regional, state, and federal agencies involved in meetings and conference calls. Many of the conversations have focused on the needs of communities outside of Corpus Christi, which sustained significant damage.

The city is in continued conversations with the U.S. Department of Housing and Urban Development (HUD) regarding potential Community Development Block Grant – Disaster Recovery (CDBG-DR) funding. At this time, HUD is continuing to analyze the various assessments completed in Corpus Christi and the surrounding communities to determine if Corpus Christi will

receive an award of CDBG-DR funding. If Corpus Christi receives CDBG-DR funding, the city will engage key stakeholders, including the public housing authority, and the community about the planned use of the funds.

Impacts on the housing market, particularly the demand for affordable housing, will be evaluated during the Consolidated Plan effort which will begin in the Spring. The Corpus Christi five-year Consolidated Plan is due to HUD in August 2018.

CONTRIBUTING FACTORS OF DISPROPORTIONATE HOUSING NEEDS

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- **Availability of affordable units in a range of sizes**
- **Displacement of residents due to economic pressures**
- **Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking**
- **Lack of access to opportunity due to high housing costs**
- **Lack of private investments in specific neighborhoods**
- **Lack of public investments in specific neighborhoods, including services or amenities**
- **Land use and zoning laws**
- **Lending discrimination**
- **Loss of Affordable Housing**
- **Source of income discrimination**
- **Other**

The following are contributing factors to disproportionate housing needs in Corpus Christi listed in priority order.

DISPLACEMENT OF AND/OR LACK OF HOUSING SUPPORT FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, AND STALKING

As indicated earlier in this report, research for this AFH indicates that survivors of domestic violence need help finding affordable housing. An article in the Corpus Christi Caller Times claimed that domestic violence in Corpus Christi was “arguably worse than any other major Texas city” and noted that eight Corpus Christi residents died from domestic violence in 2015. Although the Corpus Christi Police Department Crime Victim’s Assistance Program provides up to \$3,800 in assistance for victims of domestic violence for rent, deposits, and relocation expenses, data and services are lacking in Corpus Christi for victims of domestic violence.

LACK OF PUBLIC INVESTMENTS IN SPECIFIC NEIGHBORHOODS

Corpus Christi has only recently re-established its planning department, and historically segregated neighborhoods believe they have not received sufficient attention to overcome their disparities. According to stakeholders, these areas have low access to proficient schools and other public services.

LACK OF PRIVATE INVESTMENTS IN SPECIFIC NEIGHBORHOODS

Challenges exist in developing affordable housing units in neighborhoods on the south side and northwest, primarily due to a “Not in My Backyard” (NIMBY) attitude in these areas. Perceptions of what constitutes affordable housing also varies among stakeholders, partly because large variations in incomes such as those of refinery workers contribute to an upward bias in understanding what housing is affordable. Because of these factors, most affordable housing remains concentrated in the western and northern areas of the city.

DISPLACEMENT OF RESIDENTS DUE TO ECONOMIC PRESSURES

According to stakeholders, the proposed Harbor Bridge project is evidence of displacement of residents due to economic pressures. Texas Department of Transportation’s (TxDOT) plans to upgrade the Harbor Bridge due to high costs of maintenance and low safety standards on the existing bridge have been a matter of much debate, with stakeholders noting that the proposed Harbor Bridge project would contribute to displacement of historically segregated African American communities residing in the Hillcrest and Washington-Coles neighborhoods. The residents have filed and won a Title VI civil rights complaint with the Federal Highway Administration (FHWA), leading to a mitigation agreement that includes a government-subsidized voluntary relocation program. However, the impact of relocation programs and details of how these residents will be compensated remains to be seen.

Any expansion of industries around “refinery row” will also cause displacement of historically segregated communities of Hillcrest/Washington-Coles neighborhoods, but the shortage of affordable housing options in the south and southeast areas, represented on city documents as City Council Districts 4 and 5, further limits the possibility of finding housing elsewhere.

SOURCE OF INCOME DISCRIMINATION

Most surveyed residents (55 percent of 190 respondents) believe that they are experiencing a cost burden exceeding 30 percent of their monthly household income. Most stakeholders believe they cannot live in a neighborhood of their choice. Individuals using vouchers are often turned down by private landlords who do not accept them. According to the 2013-2017 Corpus Christi Consolidated Plan, 75 percent of voucher holders in Corpus Christi are Hispanic, suggesting that this form of discrimination creates a disparate impact on individuals who are Hispanic. Stakeholders noted that when the D.N. Leathers public housing complex was demolished in a

predominately African American community, residents faced difficulty in finding apartments that would accept vouchers, especially on the south side. This forced them to live in areas with low access to proficient schools and other public services.

LOSS OF AFFORDABLE HOUSING

Residents who were displaced when the D.N. Leathers public housing complex was demolished received tenant-based vouchers and mobility counseling that allowed them to relocate to other housing units. However, the inventory of affordable housing did not increase, and finding a landlord who will accept vouchers remains challenging for former D.N. Leathers residents as well as other voucher holders.

V.C. PUBLICLY SUPPORTED HOUSING ANALYSIS

PUBLICLY SUPPORTED HOUSING DEMOGRAPHICS

a) Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?

The distribution of racial and ethnic groups in publicly supported housing in Corpus Christi can be seen in U.S. Department of Housing and Urban Development (HUD) Table 6. Units in the public housing category of this table are owned and managed by the Corpus Christi Housing Authority (CCHA), which was established in 1938 to operate public housing in the City of Corpus Christi. Other categories in the table include Section 8 funding through project-based rental assistance and through the housing choice voucher (HCV) program. The project-based Section 8 program works with property owners, allowing for designated units of affordable housing in certain areas, while the HCV program works with tenants, allowing residents to apply their rental assistance to a property of their choosing.

Hispanic residents make up the majority of households in all categories of publicly supported housing in Corpus Christi. In public housing units, Hispanic residents make up an overwhelming majority of all households. Hispanic residents also represent a majority of the population in project-based Section 8 housing and housing choice voucher program.

Non-Hispanic White households make up a disproportionately high concentration of the population in “Other Multifamily” housing, as compared with other categories. According to HUD, the “Other Multifamily” category includes “properties funded through the Supportive Housing for the Elderly (Section 202), Supportive Housing for Persons with Disabilities (Section 811), Rental Housing Assistance (Section 236), Rent Supplement (Rent Supp), Rental Assistance Payment, and Below Market Interest Rates (BMIR) programs.”¹⁶ HUD Table 6 shows that no Black or Asian/Pacific Islander households live in these units. However, as shown in HUD Table 5, comparisons among racial and ethnic groups are limited because “Other Multifamily” units represent only a small percentage of the total housing stock in Corpus Christi.

HUD Table 6 shows that in the larger Corpus Christi region (Nueces and San Patricio counties), the composition of the population in publicly supported housing is nearly identical. This is because no publicly supported housing units are located outside the City of Corpus Christi, although housing choice voucher holders do live outside the city.

¹⁶ *Affirmatively Furthering Fair Housing (AFFH) Data Documentation*. U.S. Department of Housing and Urban Development, July 2016. p. 7. PDF File. Web. <https://www.hudexchange.info/resources/documents/AFFH-Data-Documentation.pdf>. Accessed September 2017.

Each of the HUD tables and maps in this report are numbered according to the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

HUD Table 5. Publicly Supported Housing Units by Program Category

Corpus Christi, Texas		
Housing Units	Number	Percent
Total housing units	118,475	-
Public Housing	1,836	1.55%
Project-based Section 8	1,939	1.64%
Other Multifamily	56	0.05%
HCV Program	1,385	1.17%

Sources: U.S. Census, 2010; A Picture of Subsidized Households (APSH); as retrieved from the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

HUD Table 6. Publicly Supported Households by Race/Ethnicity

Housing Type	Race/Ethnicity									
	Corpus Christi, Texas		Non-Hispanic White		Black		Hispanic		Asian or Pacific Islander	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Public Housing	106	6.98%	159	10.47%	1,251	82.41%	1	0.07%		
Project-Based Section 8	320	18.81%	182	10.70%	1,178	69.25%	17	1.00%		
Other Multifamily	12	37.50%	0	0.00%	20	62.50%	0	0.00%		
HCV Program	141	11.97%	190	16.13%	844	71.65%	3	0.25%		
Total Households	44,940	40.21%	4,915	4.40%	58,760	52.58%	1,944	1.74%		
0-30% of AMI	3,745	27.34%	945	6.90%	8,560	62.48%	210	1.53%		
0-50% of AMI	6,230	23.79%	1,695	6.47%	16,410	62.66%	340	1.30%		
0-80% of AMI	12,455	27.42%	2,840	6.25%	27,905	61.43%	545	1.20%		
Corpus Christi, Texas Region	Non-Hispanic White		Black		Hispanic		Asian or Pacific Islander			
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Public Housing	106	6.98%	159	10.47%	1,251	82.41%	1	0.07%		
Project-Based Section 8	320	18.81%	182	10.70%	1,178	69.25%	17	1.00%		
Other Multifamily	12	37.50%	0	0.00%	20	62.50%	0	0.00%		
HCV Program	270	15.25%	213	12.03%	1,282	72.39%	6	0.34%		
Total Households	68,239	43.77%	5,450	3.50%	78,115	50.11%	2,262	1.45%		
0-30% of AMI	5,539	28.75%	1,025	5.32%	12,180	63.22%	245	1.27%		
0-50% of AMI	9,794	26.29%	1,879	5.04%	22,735	61.03%	389	1.04%		
0-80% of AMI	19,779	30.97%	3,127	4.90%	37,560	58.80%	629	0.98%		

Sources: U.S. Census, 2010; A Picture of Subsidized Households (APSH); Comprehensive Housing Affordability Strategy (CHAS), 2008-2012; as retrieved from the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

- b) Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.**

HUD Table 6 above shows the comparative demographics of public housing residents and the Corpus Christi population in general. Hispanic residents live in publicly supported housing at a disproportionately high rate; Hispanic households represent roughly half of the total Corpus Christi population but are an overwhelming majority in all categories of publicly supported housing. Black households also live in publicly supported housing at a high rate, especially through the HCV program.

Totaling the numbers in each category of HUD Table 6 reveals that in all publicly supported housing units, the population is 74.4 percent Hispanic, 13.1 percent Non-Hispanic White, 12.0 percent Black, and 0.5 percent Asian or Pacific Islander. Comparing these values to the percentage of households earning less than 30 percent of the area median income (AMI) gives an indication of how the population in publicly supported housing units reflects the population in need of housing assistance. This comparison suggests that Non-Hispanic White and Asian households are slightly underrepresented in publicly supported housing, and Hispanic and Black households are slightly overrepresented.

Comparing the numbers of residents earning less than 30 percent of the area median income (AMI) in the City of Corpus Christi and the larger region shows that approximately 1,794 Non-Hispanic White households, 80 Black households, 3,620 Hispanic households, and 35 Asian or Pacific Islander households live outside of Corpus Christi on less than 30 percent AMI. Because only 593 households outside the city limits receive public housing support (through the HCV program), at least 4,936 households in this income category are in need of public housing support.

According to HUD Table 14 in the Disability and Access Analysis chapter, residents with disabilities make up 9.2 percent of the Corpus Christi population aged 18 to 64 and 5.5 percent of the population aged 65 or over. Comparing these numbers with the data shown in HUD Table 15 below suggests that residents with disabilities live in publicly supported housing at a disproportionately high rate.

HUD Table 15. Disability by Publicly Supported Housing Program Category

Corpus Christi, Texas		People with a Disability	
	Number	Percent	
Public Housing	312	20.38%	
Project-Based Section 8	403	22.81%	
Other Multifamily	28	65.12%	
HCV Program	298	24.45%	
Corpus Christi, Texas Region			
Public Housing	312	20.38%	
Project-Based Section 8	403	22.81%	
Other Multifamily	28	65.12%	
HCV Program	447	24.47%	

Source: U.S. Census Bureau American Community Survey (ACS), as retrieved from the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

HUD data indicate that approximately 51.6 percent of all households in publicly supported housing are families with children. Comparing this with the rate of families with children in the total Corpus Christi population (44.9 percent) shown in HUD Table 1 in the Demographic Summary chapter suggests that families with children are slightly more likely to live in publicly supported housing than nonfamily households.

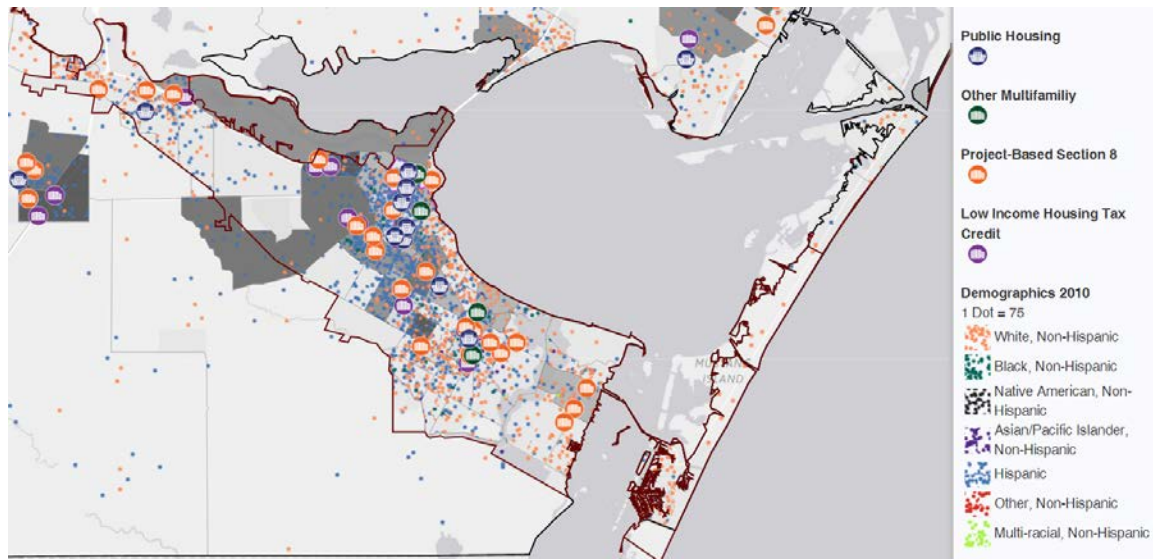
PUBLICLY SUPPORTED HOUSING LOCATION AND OCCUPANCY

a) Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

HUD Map 5 below shows the geographic location of publicly supported housing by program category. According to the map, most of the publicly supported housing in Corpus Christi is in the north-central area, north of Horne Road and east of Airport Road, and the eastern area, around Glen Arbor Park. This corresponds with the location of all seven racially or ethnically concentrated areas of poverty (R/ECAP) tracts in Corpus Christi. According to HUD Map 5, seven public housing developments, two “Other Multifamily” developments, four project-based Section 8 developments, and three Low-Income Housing Tax Credit (LIHTC) developments are located within R/ECAP tracts, while many more developments in all categories of public housing are located nearby.

One of the highest concentrations of voucher units is in the west-central area, shown in the Segregation/ Integration chapter to be predominately Hispanic. Another area with a high concentration of voucher units is in the southeast, around Schanen Estates Park. HUD data indicate that this area has a majority Hispanic population but is relatively diverse.

HUD Map 5. Publicly Supported Housing and Race/Ethnicity



b) Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs.

Patterns in the geographic location of publicly supported housing for families with children, elderly person, and persons with disabilities can be observed by comparing the demographic composition of publicly supported housing developments with the information displayed on HUD maps. HUD data indicate that the developments with the highest percentages of families with children are Treyway/Leward, La Armada III, Lantana Square, and Mckinzie/Andy Alaniz. Treyway/Leward is in the southeast area of the city, La Amarda III is north of the center of the city, Lantana Square is northwest of the center of the city, and McKinzie/Andy Alaniz is in the northwest corner of the city. Although two of these developments, Treyway/Leward and La Armada III, are located in R/ECAPs, the others are relatively dispersed across Corpus Christi. This makes it difficult to draw definitive conclusions about whether publicly supported housing for families with children is located in segregated areas.

As shown in HUD Table 15 above, the developments with the highest percentage of residents with a disability are those in the “Other Multifamily” category. This is likely because Section 811 housing, described by HUD as “Supportive Housing for Persons with Disabilities”, is included in this category. HUD data indicate that two of the largest developments of this kind are Jefferine

Lytle Estates, located in the north-central area of the city, and Henry Harbour Apartments, located in the southeast area of the city. Both of these developments are near R/ECAPs.

c) How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs?

HUD Table 7 below shows the demographic composition of occupants of publicly supported housing both inside and outside R/ECAPs. Of all publicly supported housing, 1,840 units (41.8 percent) are in R/ECAPS and 2,558 units (58.2 percent) are not in R/ECAPS. The data show that most units in the public housing category (units owned and managed by CCHA) are in R/ECAP tracts, while most units in project-based Section 8 vouchers, the “Other HUD Multifamily” category, and the HCV program are outside R/ECAP tracts.

For public housing developments, units in R/ECAP tracts have a high percentage of Hispanic residents and families with children and a relatively low percentage of elderly residents and residents with a disability.

For project-based Section 8 housing vouchers, units in R/ECAP tracts have a higher percentage of Hispanic and Black residents than in non-R/ECAP tracts. For housing in the “Other HUD Multifamily” category, no units are in R/ECAP tracts.

For the HCV program, units in R/ECAP tracts have a higher percentage of families with children and a lower percentage of elderly residents and residents with a disability than in non-R/ECAP tracts.

HUD Table 7. R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

Corpus Christi, Texas	Total Number of units (occupied)	Percent Non-Hispanic White	Percent Black	Percent Hispanic	Percent Asian or Pacific Islander	Percent Families with children	Percent Elderly	Percent with a disability
Public Housing								
R/ECAP tracts	1,239	6.38%	9.98%	83.55%	0.00%	64.21%	12.79%	17.09%
Non R/ECAP tracts	298	9.46%	12.50%	77.70%	0.34%	44.93%	33.11%	34.12%
Project-based Section 8								
R/ECAP tracts	379	4.25%	18.98%	76.49%	0.28%	50.14%	30.47%	21.88%
Non R/ECAP tracts	1,331	22.63%	8.53%	67.36%	1.19%	43.95%	34.99%	23.04%
Other HUD Multifamily								
R/ECAP tracts	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Non R/ECAP tracts	33	37.50%	0.00%	62.50%	0.00%	0.00%	47.37%	73.68%

Corpus Christi, Texas	Total Number of units (occupied)	Percent Non-Hispanic White	Percent Black	Percent Hispanic	Percent Asian or Pacific Islander	Percent Families with children	Percent Elderly	Percent with a disability
HCV Program								
R/ECAP tracts	222	13.68%	14.53%	71.79%	0.00%	57.74%	10.88%	19.67%
Non R/ECAP tracts	896	11.55%	16.53%	71.61%	0.32%	48.67%	25.82%	25.61%

Source: A Picture of Subsidized Households (APSH), as retrieved from the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

d) (1) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

(2) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

Overall, properties converted under the Rental Assistance Demonstration (RAD) program and Low-Income Housing Tax Credit (LIHTC) developments have similar demographic composition. The February 2017 “List of Unit Reservations” document on the HUD RAD website indicates that four developments in Corpus Christi are receiving assistance under the RAD program.¹⁷ These developments are Wiggins Homes, La Armada I, La Armada III, and Clairelaine Gardens. As shown in HUD Table 8, these developments all have high concentrations of Hispanic residents, corresponding to the overall trend in publicly supported housing in Corpus Christi. La Armada III does have a notably high percentage of households with children, while Clairelaine Gardens has a notably low percentage of households with children.

As shown in HUD Map 5 above, LIHTC developments in Corpus Christi are dispersed throughout the city. The demographic composition of occupants in these units is available from the State of Texas Department of Housing and Community Affairs. The most recent report is the 2015 Housing Sponsor Report, which shows that the majority of the residents in 19 of 21 properties for which data is available are Hispanic. The properties have a total of 2,648 units and all have some portion of the units adapted for special needs. These properties report serving 568 individuals with special needs.

For LIHTC applications accepted in December 2017, the City of Corpus Christi is only offering resolutions of support for developments in City Council District 3, based on an analysis demonstrating the need for affordable housing in that geographic area.

¹⁷ “RAD CHAP Awardees and Reservations.” *Portal.hud.gov*. U.S. Department of Housing and Urban Development, 2017. Web. https://portal.hud.gov/hudportal/documents/huddoc?id=radreservations_021617.pdf. Accessed August 2017.

HUD Table 8 below shows the demographic composition of other publicly supported housing developments in Corpus Christi, including public housing units managed by CCHA, project-based Section 8 units, and other multifamily housing. In the public housing and project-based Section 8 categories, developments with high concentrations of Non-Hispanic White residents are Castle Manor, Laguna, and Coastal Haven; developments with high concentrations of Hispanic residents are Samuel Place Apartments, Ltd., La Armada I, and Hacienda Senior Apartments; developments with high concentrations of Black residents are Elliot Grant Homes and Palms at Leopard. In the other multifamily category, HUD only provides demographic data for two developments: Jefferine Lytle Estates, which has an overwhelming majority of Hispanic residents, and Henry Harbour, which has a slight majority of Non-Hispanic White residents.

In the public housing and project-based Section 8 categories, developments with high concentrations of households with children are Treyway/Leeward, Lantana Square, and Mckinzie/Andy Alaniz, and developments with low concentrations of households with children are Sea Gulf Villa, Elliot Grant Homes, and Parkway/Ruthmary Price. In the other multifamily category, the only development for which data are available on these households is the Henry Harbour development, which has a low concentration of households with children.

HUD Table 8. Demographics of Publicly Supported Housing Developments, by Program Category

Public Housing Corpus Christi, Texas						
Development Name	Number of Units	Non-Hispanic White	Black	Hispanic	Asian or Pacific Islander	Households with Children
Treyway/Leeward	208	7%	13%	79%	n/a	86%
Clairelaine Gardens	186	4%	12%	84%	n/a	22%
Mckinzie/Andy Alaniz	80	7%	12%	82%	n/a	81%
La Armada Iii	100	9%	9%	83%	n/a	80%
D.N. Leathers I	122	11%	20%	69%	n/a	59%
Parkway/Ruthmary Price	122	10%	7%	83%	1%	11%
Navarro Place	210	8%	11%	80%	n/a	61%
La Armada I	250	4%	8%	88%	n/a	65%
La Armada Ii	400	9%	8%	83%	n/a	74%
Wiggins Homes	158	6%	11%	83%	n/a	63%
Project-Based Section 8 Corpus Christi, Texas						
Development Name	Number of Units	Non-Hispanic White	Black	Hispanic	Asian or Pacific Islander	Households with Children
Castle Manor	61	63%	2%	27%	6%	52%
911 Glenoak	68	42%	12%	44%	2%	72%
Palms At Leopard	120	2%	36%	61%	1%	60%

Gulfway Manor	151	6%	13%	81%	n/a	70%
Lulac West Park Apartments	124	13%	3%	85%	n/a	63%
Hacienda Senior Apartments	60	3%	10%	87%	n/a	n/a
Coastal Haven	100	53%	3%	44%	n/a	n/a
Hampton Port	110	12%	6%	81%	n/a	62%
Samuel Place Apartments	60	7%	4%	89%	n/a	65%
Arrowsmith	70	10%	6%	82%	n/a	46%
Lexington Manor	52	n/a	n/a	n/a	n/a	n/a
Sea Gulf Villa	111	44%	6%	46%	1%	1%
Lulac Village Park	152	7%	7%	86%	n/a	74%
Oso Bay Apartments	100	30%	6%	60%	4%	59%
Country Estates	42	n/a	n/a	n/a	n/a	n/a
Lantana Square	44	5%	10%	85%	n/a	85%
Casa De Manana	99	2%	21%	77%	n/a	66%
Elliot Grant Homes	40	2%	68%	30%	n/a	3%
Briarwood Apartments	140	24%	10%	63%	4%	32%
Woodland Creek Apartments	94	12%	6%	82%	n/a	77%
Palacio Residencial	94	9%	1%	86%	3%	n/a
Laguna	47	60%	13%	24%	n/a	13%

**Other HUD Multifamily Assisted Housing
City of Corpus Christi, Texas**

Development Name	Number of Units	Non-Hispanic White	Black	Hispanic	Asian or Pacific Islander	Households with Children
1602 South Staples Housing	5	n/a	n/a	n/a	n/a	n/a
Jefferine Lytle Estates	24	9%	9%	82%	n/a	n/a
Henry Harbour	24	54%	n/a	46%	n/a	4%
Riley Gardens	3	n/a	n/a	n/a	n/a	n/a

Source: A Picture of Subsidized Households (APSH), as retrieved from the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

- e) Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.**

The demographics of most publicly supported housing units in Corpus Christi are similar to the areas in which they are located. As shown in HUD Map 5 above, most public housing developments in Corpus Christi are located in the center of the city. This area has a high concentration of Hispanic residents, particularly in the west-central neighborhoods, and a high

concentration of Black residents, particularly in the Hillcrest and Washington-Coles neighborhoods. As shown in HUD Table 6 above, Hispanic and Black residents make up the majority of public housing residents.

Public housing developments currently being converted under RAD are all located in north-central Corpus Christi. This is an area with a high concentration of Hispanic residents, matching the composition of these predominately Hispanic developments.

HUD Map 5 indicates that project-based Section 8 housing is more dispersed across the city, with developments in the central and southeast areas and along the eastern coast. HUD Table 8 above indicates that Non-Hispanic White residents are more concentrated in these coastal developments, which include Castle Manor Apartments, Laguna Apartments, and 911 Glenoak. The demographic composition of these developments corresponds with the general trend in Corpus Christi, with Non-Hispanic White residents being more likely to live on the coast and in these developments.

The highest concentration of residents in the HCV program is in the northwest-central area of the city, a predominately Hispanic area. Units in the HCV program also have a high percentage of Black residents, as shown in HUD Table 6 above. However, as shown in HUD Table 5, the northeast area of the city, where many Black residents live in the Hillcrest and Washington-Coles neighborhoods, has few units in the HCV program.

Units in the “Other HUD Multifamily” category are located in the north-central and southeast areas. Although these units have a higher concentration of Non-Hispanic White residents than the neighborhoods in which they are located, it is difficult to draw definitive conclusions about these units because they offer specialized care, including supportive services for elderly residents or residents with disabilities. LIHTC developments are more widespread, located in the northwest, west-central, and southeast areas. These areas have a high percentage of Hispanic residents.

HUD Maps 14.1 and 14.2 in the Disability and Access Analysis chapter show the location of residents with disabilities in Corpus Christi. Most of these residents are concentrated in the southeast-central area of the city, slightly south of the location of most publicly supported housing developments. Developments with a high concentration of families with children are dispersed throughout the city: Treyway/Leeward is in the southeast area, Lantana Square is in the northwest-central area, and Mckinzie/Andy Alaniz is northwest of the city, in Arlington Heights. As shown in HUD Map 7.3 in the Disparities in Access to Opportunity chapter, areas of Corpus Christi with a high concentration of families with children are the northeast coast, the south side, and the northwest-central area.

DISPARITIES IN ACCESS TO OPPORTUNITY

- a. **Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.**

HUD Map 5 shows that most publicly supported housing units in Corpus Christi are located in the north-central area of the city. This is an area shown to have low access to proficient schools and high exposure to poverty in HUD Maps 7.1 and 12.1 of the Disparities in Access to Opportunity chapter. Some project-based Section 8 and other multifamily developments are also in the southeast area of the city; HUD Map 8.1 in the same chapter shows that this is an area with low job proximity.

The east-central area of the city also has a relatively high concentration of units in the HCV program; according to HUD data, HCV units represent 15.8 percent of households in census tract 7 and 8.0 percent of households in census tract 8. HUD Maps 9.1 and 12.1 in the Disparities in Access to Opportunity chapter indicate that this is an area with low labor market engagement and high exposure to poverty.

ADDITIONAL INFORMATION

- a) **Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.**
- b) **The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.**

The CCHA is currently working through the RAD program to improve the stock of publicly supported housing in Corpus Christi. According to HUD, this program allows housing authorities to “preserve and improve public housing properties and address the \$26 billion dollar nationwide backlog of deferred maintenance” by converting public housing units to the Section 8 voucher program “so that providers may leverage the private capital markets to make critical improvements.”¹⁸ Four developments are currently being converted through this program: Wiggins Homes, La Armada I, La Armada III, and Clairelaine Gardens. A representative from CCHA

¹⁸ “Rental Assistance Demonstration.” HUD.gov. U.S. Department of Housing and Urban Development, n.d. Web. <https://www.hud.gov/RAD>. Accessed September 27, 2017.

believes that this will allow for more flexibility in hiring private contractors, which will lead to more renovations and potentially increase the supply of available units.

The CCHA also provides mobility counseling to help residents interested in moving to areas of opportunity in the city, providing information on poverty concentration, crime, schools, income, and jobs to help inform their decisions. The authority hopes to offer a program that will provide monthly classes on financial literacy and other topics that will prepare residents receiving housing choice vouchers to enter the rental market. Through this program, residents will have the opportunity to obtain a certification of their financial literacy that they can present to potential landlords.

In 2017, the CCHA began the demolition of the D.N. Leathers public housing complex, located on 1001 Coke Street. Although residents were provided tenant-based vouchers and mobility counseling to help with their relocation, the inventory of affordable housing did not increase, limiting the supply of publicly supported units.

CONTRIBUTING FACTORS OF PUBLICLY SUPPORTED HOUSING LOCATION AND OCCUPANCY

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- Land use and zoning laws
- Community opposition
- Impediments to mobility
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Lack of regional cooperation
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- Sitting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- Source of income discrimination
- Other

The following are contributing factors to publicly supported housing location and occupancy in Corpus Christi listed in priority order.

LACK OF PUBLIC INVESTMENT IN SPECIFIC NEIGHBORHOODS, INCLUDING SERVICES AND AMENITIES

Stakeholders believe that Corpus Christi is not proactive in neighborhood planning, noting that the city was without a planning department for nearly three years and only recently re-established one. Because of this, some neighborhoods in Corpus Christi do not receive the targeted attention that some stakeholders believe is necessary to overcome historical disparities. The newly formed planning department is currently working on creating area development plans to address the needs of nine specific areas of Corpus Christi: the northwest, downtown, midtown, west side, south side, Corpus Christi Airport, Flour Buff, the portion of North Padre Island located in City Council District 4, and London areas. On the west side, which has the highest concentration of publicly supported housing units, residents have low access to proficient schools and other public services.

IMPEDIMENTS TO MOBILITY

According to stakeholders, redeeming housing choice vouchers is difficult in Corpus Christi, often due to source of income discrimination from landlords. One stakeholder reported contacting 54 different housing developments in Corpus Christi and only receiving confirmation of availability for voucher holders from five. Although CCHA has implemented more mobility counseling, the planned conversion of more publicly supported units to the HCV program due to RAD will only increase the need for active measures in improving housing mobility. Stakeholders reported receiving outdated information about housing developments that would accept vouchers.

LACK OF REGIONAL OR LOCAL COOPERATION

Stakeholders mention that local policymakers are interested in publicly supported housing, but they are often not informed about the most effective uses of their resources. For example, although the City of Corpus Christi maintains a Type A Fund for affordable housing (paid for by a one-eighth cent sales tax), some stakeholders believe that the funds are not being spent in a way that best provides affordable housing opportunities. The Type A Fund has \$500,000 to distribute on an annual basis; in 2015 and 2016, a total of \$400,000 was given to the CCHA to rehabilitate one of its public housing complexes and bring seven previously unusable units back into the market. Although these funds provide some resources for improving publicly supported housing, more cooperation between local government, nonprofits, and the CCHA could ensure that resources are distributed appropriately and that policy intentions are aligned around common goals.

COMMUNITY OPPOSITION

Stakeholders report community opposition to the development of new publicly supported housing units that limits the supply and location of these units in Corpus Christi. In one instance,

according to a representative from CCHA, residents on the south side rejected a proposal for an affordable housing development at the intersection of Wooldridge Road and Quebec Drive, leading CCHA to sell the 14.5 acre plot. Stakeholders believe that because members of the community are not knowledgeable about affordable housing, they do not understand the benefits to the city of having a variety of housing options, and assume affordable units are low quality. According to stakeholders, this leads many residents to adopt a “Not in My Backyard” (NIMBY) attitude toward publicly supported units.

V.D. DISABILITY AND ACCESS ANALYSIS

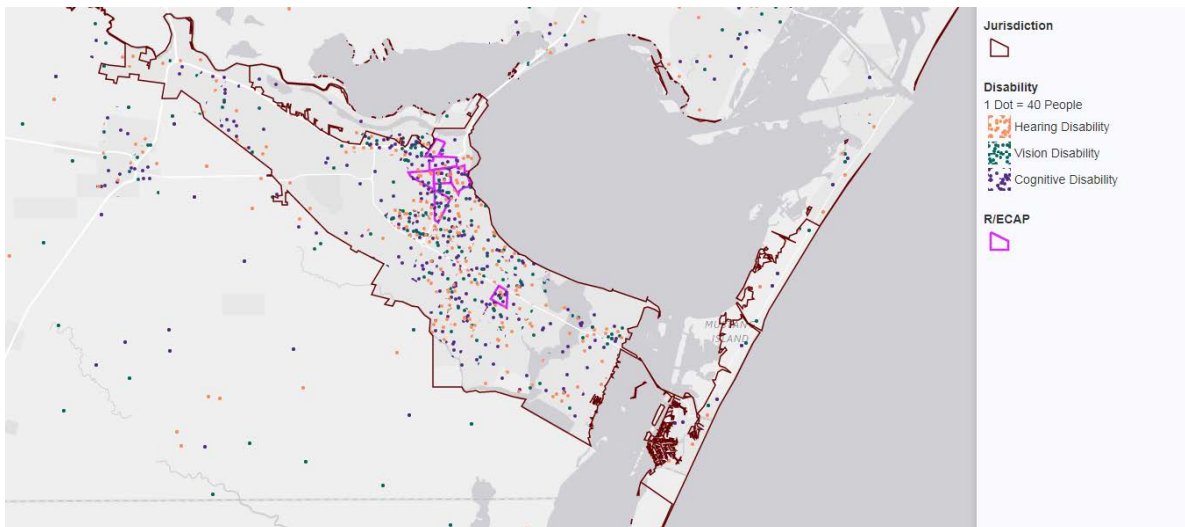
POPULATION PROFILE

a) How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

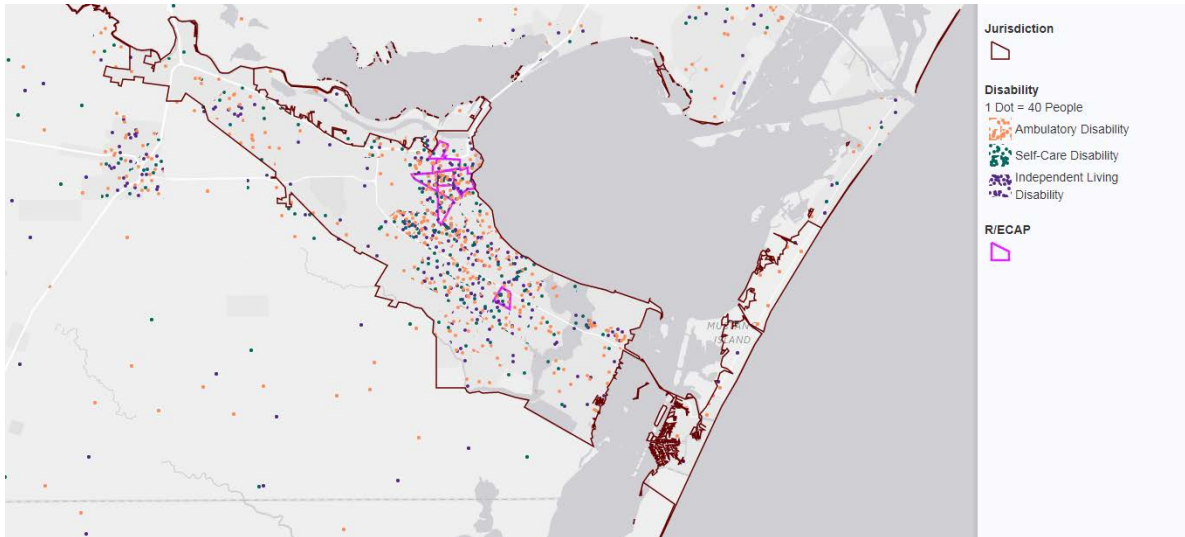
U.S. Department of Housing and Urban Development (HUD) Maps 14.1 and 14.2 below show the geographic dispersion of persons with various types of disabilities in Corpus Christi. The dispersion of such persons follows the general population density; however, concentrations of persons with disabilities near the city center are higher as a percentage of the population than in other areas. These areas of higher concentration include, but are not limited to, the seven racially or ethnically concentrated areas of poverty (R/ECAPs) in the city. The west-central area (around Corpus Christi International Airport) is predominately Hispanic and does not appear to have a concentration of persons with disabilities; the northeast bay and the portion of North Padre Island in Council District 4 are predominately Non-Hispanic White and also do not appear to have disproportionately high concentrations of persons with disabilities.

Each of the HUD tables and maps in this report are numbered according to the HUD Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool.

HUD Map 14.1 Disability by Type: Hearing, Vision, Cognitive



HUD Map 14.2 Disability by Type: Ambulatory, Self-Care, Independent Living



b) Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.

The Corpus Christi region consists of Nueces and San Patricio counties. Comparing HUD maps 14.1 and 14.2 above does not reveal an obvious difference in geographic dispersion for persons with different types of disability within the City of Corpus Christi. HUD Table 13 shows that for all types of disabilities under consideration, residents of Corpus Christi experience somewhat lower rates of disability than the region as whole. The largest difference is in the rate of ambulatory disability with 13,179 additional individuals with a disability in the region compared to the City of Corpus Christi. The smallest difference is in the rate of cognitive disability, which Corpus Christi residents experience at a rate nearly identical to that of the region.

HUD Table 13 Disability by Type

Disability Type	Corpus Christi, Texas		Corpus Christi, Texas Region	
	Number	Percent	Number	Percent
Hearing difficulty	13,899	4.92%	20,912	5.27%
Vision difficulty	10,222	3.62%	15,370	3.87%
Cognitive difficulty	19,171	6.78%	27,216	6.86%
Ambulatory difficulty	25,883	9.16%	39,062	9.85%
Self-care difficulty	11,913	4.21%	17,408	4.39%
Independent living difficulty	17,164	6.07%	25,457	6.42%

Note 1: All percentages represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: American Community Survey (ACS)

HUD Table 14 shows that Corpus Christi residents between the ages of 5 and 17 experience disabilities at a rate just higher than the region as a whole. City residents between 18 and 64 years of age and over 65 experience disabilities at a rate slightly lower than the region as a whole. The higher rates of disability among children and youth in the city as compared with the region may be related to better access to schools with accommodations for children who are disabled. HUD Map 15 suggests that children (aged 5 to 17) with disabilities are concentrated in and around the seven R/ECAPs identified in the city.

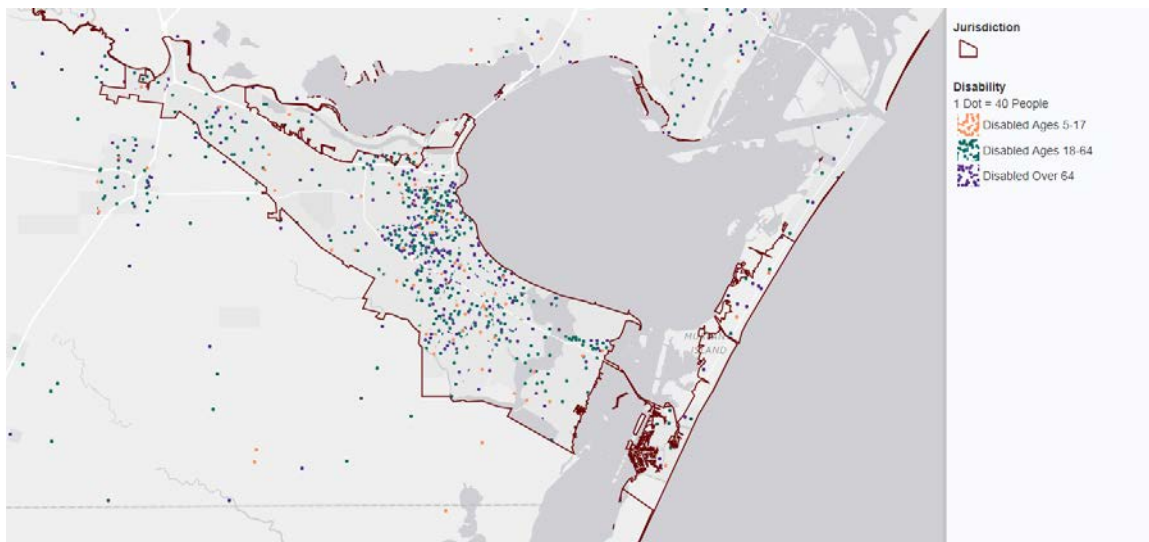
HUD Table 14 Disability by Age Group

Age of People with Disabilities	Corpus Christi, Texas		Corpus Christi, Texas Region	
	Number	Percent	Number	Percent
Age 5-17 with Disabilities	4,837	1.71%	6,432	1.62%
Age 18-64 with Disabilities	25,933	9.17%	37,793	9.53%
Age 65+ with Disabilities	15,673	5.54%	24,491	6.17%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

HUD Map 15 Disability by Age Group



HOUSING ACCESSIBILITY

a) Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Stakeholders interviewed as part of the community participation process for the Corpus Christi Assessment of Fair Housing (AFH) believe that Corpus Christi has a lack of accessible housing for residents with disabilities. They pointed out that Corpus Christi has an older population and residents are aging into disabilities. Once an individual receives an accessible unit in public

housing, they typically stay for a very long time, and it is difficult to find open units for people transitioning out of institutions or others needing an accessible unit. Advocates for individuals with disabilities believe that the city does not prioritize the needs of disabled residents in planning efforts. Stakeholders report that CCHA has 91 accessible units and is currently the only source of permanent housing for residents with disabilities.

Residents engaged in public participation noted that affordable housing is difficult to find in a range of unit sizes. Residents also discussed the need for increased assistance for home modifications for individuals who own their homes and have a disability or are aging into a disability. The City of Corpus Christi Human Relations Division lists eight privately-owned affordable housing developments for persons who are elderly or disabled with a total of 600 units. These include 392 studio or one-bedroom units and 13 two-bedroom units which are publicly supported under the Section 8 and Section 202 programs and an additional 180 one- and two-bedroom units that are not publicly supported.

Limited data are available on the characteristics of individuals with disabilities in Corpus Christi. However, a state-wide report from the Texas Workforce Investment Council shows that labor force participants with disabilities are less likely than labor force participants without disabilities to have a bachelors degree and that labor force participants with disabilities earn less income than labor force participants without disabilities at all education levels.¹⁹ U.S. Census data from the 2011-2015 ACS shows that 22.4 percent of the population with disabilities in Texas are below 100 percent of the federal poverty line compared to 16.6 percent of the population without a disability.

Stakeholders during community participation noted that some individuals with disabilities cannot work or can only work on a limited basis; for these individuals Social Security Income (SSI) is their only source of income. SSI offers a fixed monthly income to adults or children with a disability and persons over the age of 65 who meet the financial limits. Stakeholders said that the fixed income is low and individuals with SSI as well as other individuals with disabilities who are not fully employed are in need of affordable housing programs in the city.

b) Describe the areas where affordable accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

Data for the affordability and accessibility of all rental units by census tract are not available from the HUD Affirmatively Furthering Fair Housing (AFFH) tool for Corpus Christi. However, data are available on affordable, accessible housing provided through various publicly supported housing programs including public housing, project-based Section 8, Section 8 housing choice voucher

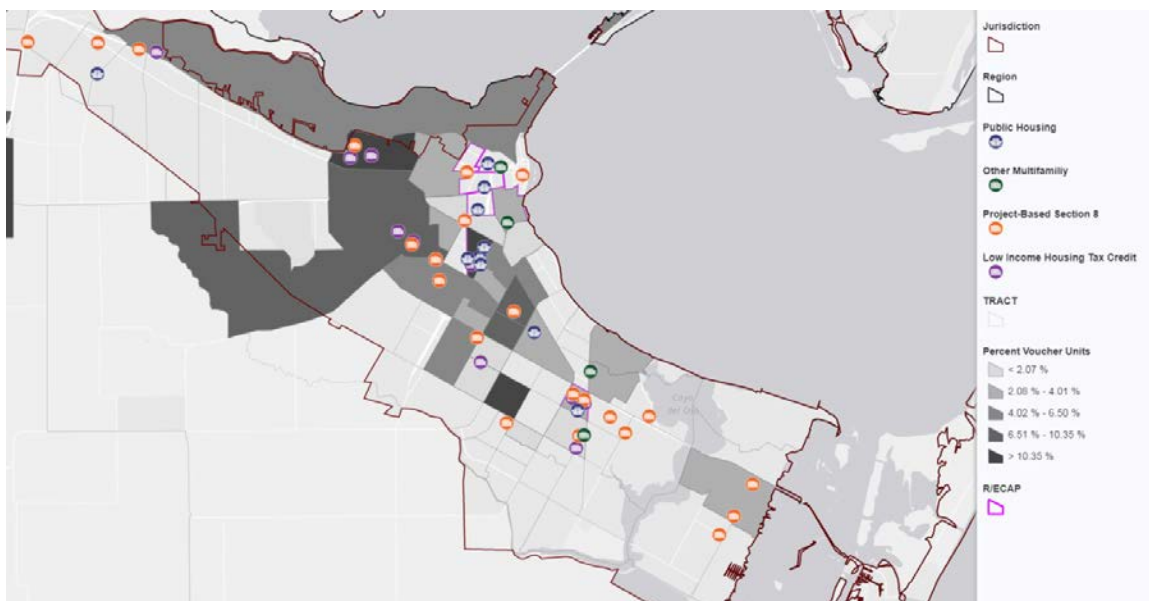
¹⁹ "People with Disabilities: A Texas Profile." Texas Workforce Investment Council, June 2016. PDF. Web. https://gov.texas.gov/uploads/files/organization/twic/Disabilities_Profile.pdf. Accessed September 27, 2017.

(HCV) program, Low-Income Housing Tax Credit (LIHTC), and other multifamily properties which include properties funded through the Supportive Housing for the Elderly (Section 202), Supportive Housing for Persons with Disabilities (Section 811), Rental Housing Assistance (Section 236), Rent Supplement (Rent Supp), Rental Assistance Payment, and Below Market Interest Rates (BMIR) programs.

HUD Map 5 below shows that Corpus Christi has 23 project-based Section 8 developments, four of which are located within R/ECAPs. The city has 10 public housing developments, seven of which are located in R/ECAPs. The city also has 17 LIHTC developments including both new construction and rehabilitation projects, of which five are located in R/ECAPs. One of the four other multi-family developments in the city is located in a R/ECAP. In total, 17 out of 54 (31.5 percent) of the publicly supported housing developments in Corpus Christi are located in a R/ECAP.

The shading on the map shows that areas near the city center have the highest percentage of HCV units. The areas that show over 6.5 percent voucher units are consistent with the areas referred to as the north side and the west side by residents and stakeholders during community participation. Similarly, the areas with less than 2.1 percent voucher units are in the far northwest of Corpus Christi and on the south side, consistent with community input. Comparing HUD Map 5 below with HUD Map 7 in the disparities in access to opportunity chapter of this AFH shows that areas of the city where HCVs are accepted are not located near proficient schools, which was echoed in comments received during community participation activities for this AFH.

HUD Map 5 – Public Housing



HUD Table 5 below shows the number of publicly supported housing units in Corpus Christi by program category. In total, the city has 5,216 publicly supported units across all categories, which represent about 4.4 percent of all housing units.

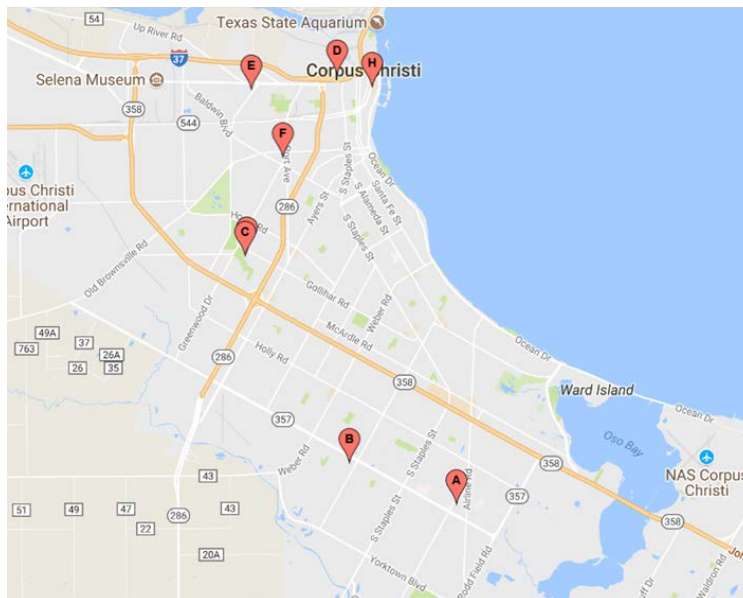
HUD Table 5 Publicly Supported Housing Units by Program Category

Corpus Christi, Texas		
Housing Units	Number	Percent
Total housing units	118,475	-
Public Housing	1,836	1.55%
Project-based Section 8	1,939	1.64%
Other Multifamily	56	0.05%
HCV Program	1,385	1.17%

Note 1: Data Sources: Decennial Census; A Picture of Subsidized Households (APSH)

In addition, the City of Corpus Christi Human Relations Division, which administers the Fair Housing Assistance Program (FHAP), maintains a list of eight privately-owned affordable housing developments for persons who are elderly or disabled with a total of 600 units. These include 392 studio or one-bedroom units and 13 two-bedroom units which are publicly supported under the Section 8 and Section 202 programs and an additional 180 one- and two-bedroom units that are not publicly supported. Comparing Map V-6 of privately-owned affordable and accessible housing developments to the HUD maps of race/ethnicity and opportunity indicators shows that all of these developments are located in low opportunity neighborhoods and areas with a predominantly Hispanic population.

Map V-6 Privately-owned Affordable and Accessible Housing Developments



c) To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

HUD Table 15 below shows the extent to which persons with different disabilities are able to access and live in the different categories of publicly supported housing. The table indicates that roughly one in five project-based Section 8 or other public housing residents are persons with disabilities. Nearly one in four housing choice voucher (HCV) program participants, and nearly two-thirds of the city's 43 "other multifamily" residents are persons with disabilities. The table suggests that nearly one-quarter of all publicly supported housing units in Corpus Christi are occupied by persons with disabilities. This is lower than Texas and the United States; according to the HUD public housing resident characteristics report for May 2016 through August 31 2017, 38.3 percent of residents in publicly supported housing in Texas, and 41.4 percent in the United States are persons with disabilities.²⁰ However, according to five-year estimates from ACS (2011-15), Corpus Christi has a somewhat larger proportion of residents with disabilities (13.9 percent) than Texas and the United States (11.6 percent each).²¹

Stakeholders believe that the CCHA does not have a sufficient number of accessible units available in publicly supported housing in Corpus Christi to meet the needs of the population with disabilities. In the community participation section, it is noted that public housing in Corpus Christi is out of date and needs updating to meet American with Disabilities Act (ADA) standards which may contribute to a lack of available units. The median income for individuals who are disabled in Corpus Christi is 78.2 percent of the median income of the general population of the city; this is a higher relative income than for individuals who are disabled in Texas (71.2 percent) or the United States (67.9 percent). It is also possible, then, that the higher relative income of residents with disabilities in Corpus Christi contributes to a lower percentage of residents with a disability living in public housing.

²⁰ "Resident Characteristics Report." *hudaps.hud.gov*. Department of Housing and Urban Development. Web. https://hudapps.hud.gov/public/picj2ee/Mtcsrcr?category=rcr_ttp&download=false&count=0. Accessed September 27, 2017.

²¹ 2011-2015 American Community Survey 5-Year Estimates S1810.

HUD Table 15 Disability by Publicly Supported Housing Program Category

Corpus Christi, Texas		People with a Disability	
Publicly Supported Housing Type	Number	Percent	
Public Housing	312	20.38%	
Project-Based Section 8	403	22.81%	
Other Multifamily	28	65.12%	
HCV Program	298	24.45%	
(Corpus Christi, Texas) Region			
Public Housing	312	20.38%	
Project-Based Section 8	403	22.81%	
Other Multifamily	28	65.12%	
HCV Program	447	24.47%	

Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Note 2: Data Sources: ACS

INTEGRATION OF PERSONS WITH DISABILITIES LIVING IN INSTITUTIONS AND OTHER SEGREGATED SETTINGS

a) To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Persons with disabilities in Corpus Christi appear more likely to live in settings segregated by race or ethnicity, national origin, or limited English proficiency than the general population. According to the 2010 decennial U.S. Census data used for the HUD AFFH mapping tool, eight percent of the general population of Corpus Christi lives in the seven R/ECAPs in the city while 10 percent of persons with disabilities live in R/ECAPs. As discussed in the segregation/integration chapter of this AFH, the areas in and around the R/ECAPs are among the most segregated, with predominately Hispanic residents, many residents from Mexico, and many Spanish-speaking residents.

b) Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

A number of publicly supported housing programs and private developments in Corpus Christi provide access to affordable housing and supportive services for persons with disabilities. CCHA manages over 1,800 units and is currently accepting Section 8 project-based voucher waiting list applications for elderly, disabled and very low to extremely low-income families for the Sea Breeze Seniors Apartments (200 units) and Corban Townhomes (128 units).

The CCHA HCV waiting list is currently closed. The HCV waitlist was last opened June 2015, when CCHA received 46,000 applications and randomly selected 1,000 to add to the waitlist. Of

the 1,261 HCVs in the CCHA inventory, 92 are categorized as “non-elderly disabled” (NED).²² NED vouchers serve disabled persons under the age of 62 who are living in an institution or a nursing facility but want to transition to living in their own home. Most recipients use their Section 8 benefits for apartments or single-family homes, but individuals with a disability can also use it to pay for a group home, shared housing, congregate housing, a room, or an assisted living facility.²³ The City of Corpus Christi Human Relations Division lists eight privately-owned affordable housing developments for persons who are elderly or disabled with a total of 600 units. Representatives from Coastal Bend Center for Independent Living (CBCIL) participated in an interview and focus group for this report. CBCIL is a nonprofit that provides support services for individuals with disabilities in Corpus Christi. Their housing-specific services include home modification assistance and a Tenant Based Rental Assistance Program that provides short-term vouchers to individuals with disabilities who are waiting to access permanent subsidized housing. In addition to housing support, CBCIL provides community living assistance and case management, mobility services, healthcare navigation services, and other services.

DISPARITIES IN ACCESS TO OPPORTUNITY

a) To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:

- i. Government services and facilities**
- ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)**
- iii. Transportation**
- iv. Proficient schools and educational programs**
- v. Jobs**

Most respondents to the resident survey conducted for this AFH describe the public areas and facilities in Corpus Christi as “somewhat accessible” and 17 percent describe them as “very accessible”. The barriers faced by individuals with disabilities include the following:

GOVERNMENT SERVICES AND FACILITIES. Section 24-90 of the city code of Corpus Christi requires that any program or activity operated or contracted for by the city will provide reasonable accommodation to individuals with a disability. Currently, not all public facilities meet ADA standards. *Plan CC*, the recently updated comprehensive plan that creates a 20-year policy and strategic framework for the city, has a goal related to accessibility: “New or renovated buildings, facilities, and open spaces that are required to comply with ADA (Americans with

²² “Corpus Christi Housing Authority.” Affordable Housing Online, 4/26/2017. Web. <https://affordablehousingonline.com/housing-authority/Texas/Corpus-Christi-Housing-Authority/TX008> 9/28/2017.

²³ “Section 8 Vouchers – Special Cases.” Low-Income-Housing-Help, n.d. Web. <https://low-income-housing-help.com/special-case-vouchers>. 9/28/2017

Disabilities Act) standards do comply.”²⁴ One of the two strategies listed for decision makers in the city is to: “Support programs to meet all outstanding ADA deficiencies in public facilities.”²⁵

PUBLIC INFRASTRUCTURE. Participants in the community participation component of this AFH often stated that public infrastructure is old and needs to be repaired, often referring to streets and sidewalks. By city ordinance, property owners are responsible for sidewalk maintenance. Occasionally small stretches of sidewalk are repaired or replaced by the city as part of a street project. A Residential Street Rebuild Program (RSRP) is presently under development as part of the Street Improvement Plan (SIP) for the city. The RSRP is intended to address the poor conditions of residential streets in Corpus Christi.

TRANSPORTATION. The Corpus Christi Regional Transportation Authority operates 25 local bus routes which offer services to most areas in the central, east, and northeast portions of the city. However, large areas of City Council Districts 4 and 5 are not connected to public transit networks, making it challenging for individuals with disabilities to access services throughout the city.

All Corpus Christi Regional Transportation Authority (CCRTA) buses are accessible and equipped with ramps or wheelchair lifts. Buses are capable of lowering the entrance door to make it easier for passengers to board the vehicle. Seating areas at the front of the bus are reserved for persons with disabilities and older adults requiring assistance with boarding and exiting the bus. Wheelchair securement areas are also located at the front of the bus. Automated systems or CCRTA operators must announce, at a minimum, all transfer points, major intersections, destination points, and other intervals along a route sufficient to permit individuals with visual or cognitive disabilities to be oriented to their location. In addition, the operator is required to announce any stop upon the request of the rider. Persons over the age of 60 years with a Medicare card or a disability qualify to apply for the CCRTA reduced fare program.

Stakeholders interviewed during the community participation process for this AFH indicated that persons with disabilities have difficulty accessing transportation. In some cases, a bus stop for a CCRTA bus is not nearby or the route to the bus stop is not accessible. The B-line is a paratransit service that provides door-to-door transportation services for people with disabilities who qualify for service. However, advocates for individuals with disabilities noted that it can be inconvenient because service must be scheduled three days in advance. According to the B-line, no exceptions are granted to this scheduling requirement.

²⁴ Plan CC Comprehensive Plan. p. 46.

²⁵ Plan CC Comprehensive Plan. p. 46.

PROFICIENT SCHOOLS AND EDUCATIONAL PROGRAMS. Corpus Christi has five public school districts. All are required through federal law under Section 504 of The Rehabilitation Act of 1973 to provide free and appropriate education for students with disabilities. Comparing HUD Map 5 in this chapter on availability of public housing in Corpus Christi to HUD Map 7, in the disparities in access to opportunities chapter of this AFH, of School Proficiency shows that areas where affordable, accessible housing is located do not have access to high proficiency schools in Corpus Christi. This disproportionately affects residents with disabilities who make up 13.9 percent of the population in Corpus Christi but close to a quarter of the residents living in publicly supported housing in the city. Additionally, HUD Map 15 suggests that school-aged children (ages 5 to 17) with disabilities are concentrated in and around the seven R/ECAPs identified in the city.

JOBS. Five-year estimates from the ACS (2011-15) suggest that accessing work in the city may be difficult for persons with disabilities. The labor force participation rate among persons with disabilities is 45.1 percent. Among all residents 16 years and older in the city, the labor force participation rate is 65.0 percent.²⁶

b) Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

The City of Corpus Christi Housing and Community Development Department (HCD) has a minor home rehabilitation program funded through CDBG funds. This program provides minor home repairs (plumbing or minor structural repairs are allowed by the program) to citizens 62 or older or who are disabled and includes accessibility repairs or installments such as ADA-compliant showers and toilets and widening doorways. The city also provides funding to CBCIL which also assists clients with ADA-compliant ramps and home modifications. Individuals may apply for the modifications by contacting the city or CBCIL.

Persons with disabilities who require additional assistance or a reasonable accommodation to access city services, programs, activities, and facilities may contact the city ADA Coordinator at least 48 hours in advance for assistance by telephone. The Trash and Recycle Pick-Up Service (TARPS) provides limited accommodation upon request by telephone to assist individuals who have a temporary/permanent disability or medical condition which prohibits them from pulling or pushing the garbage/recycling cart(s) to the curb on their designated pick-up days. Among the fair housing goals set by the CCHA is a goal ensuring accessible housing to persons with all disabilities regardless of unit size required. This goal is addressed by the policies laid out in the CCHA's admissions and continued occupancy policy (ACOP).

²⁶ United States Census Bureau 5 year estimate 2011-2015..

As noted above, the B Line paratransit service for individuals with disabilities is available for those who qualify and must be arranged three days in advanced. Workforce Solutions of the Coastal Bend provides links and resources for persons with disabilities that include organizations that can help individuals find employment or income.

c) Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.

In interviews and focus groups stakeholders discussed that development is occurring in underdeveloped areas outside of the city center. They noted that building affordable housing in surrounding rural areas does not benefit the disabled community, which relies on public transportation and needs affordable, accessible housing within the city where transportation is accessible.

Stakeholders interviewed as part of the community participation process for the Corpus Christi AFH indicate that the highest volume of fair housing complaints in Corpus Christi is regarding modifications for persons with disabilities. Individuals who age into a disability experience difficulty requesting modifications through private landlords and homeowners experience difficulty finding affordable services for home modification. Additionally, some of the public housing facilities are old and need modifications to comply with the ADA regulations.

DISPROPORTIONATE HOUSING NEEDS

a) Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.

As noted previously in this chapter, national and state-level data indicate that individuals with disabilities typically have lower average incomes than individuals without disabilities. Although local data are limited on the incomes of individuals with disabilities, stakeholders engaged in community participation for this AFH agree that individuals with disabilities in Corpus Christi are often disproportionately affected by the cost burden of housing.

The disproportionate housing needs section of this AFH identifies several geographic areas of Corpus Christi where housing problems, such as cost burden, overcrowding, or substandard housing, are concentrated. These areas are the north-central, the west-central, and northeast areas of the city. The north-central area includes several neighborhoods designated as R/ECAPs. These areas correspond with the areas identified at the beginning of this chapter in HUD Map 5 where residents with all types of disabilities are more concentrated. This suggests that persons with disabilities may experience disproportionate housing needs in the city.

ADDITIONAL INFORMATION

- a) **Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.**
- b) **The program participant may also describe other information relevant to its assessment of disability and access issues.**

Information from the resident survey conducted for the Corpus Christi AFH is relevant to disability and access issues in the city. Approximately 11 percent of respondents to the survey have someone with one or more disabilities living in their home, and 9 percent have at least one person over age 65 living in their home. Eight percent of respondents indicate that their residence has been modified for a disability. Some respondents paid for these modifications through a personal loan while others say that their apartments came with accessibility modifications. Most respondents (56 percent) report modified toilet seats in their residences; others say handicap showers are installed. Some residents (12 percent) say that they need accessibility modifications, specifying the need for widened doorways, modified bathrooms, and wheelchair ramps. Many respondents (65 percent) did not know how to request modifications to their residence for a disability.

DISABILITY AND ACCESS ISSUES CONTRIBUTING FACTORS

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- **Access for persons with disabilities to proficient schools**
- **Access to publicly supported housing for persons with disabilities**
- **Access to transportation for persons with disabilities**
- **Inaccessible government facilities or services**
- **Inaccessible public or private infrastructure**
- **Lack of access to opportunity due to high housing costs**
- **Lack of affordable in-home or community-based supportive services**
- **Lack of affordable, accessible housing in range of unit sizes**
- **Lack of affordable, integrated housing for individuals who need supportive services**
- **Lack of assistance for housing accessibility modifications**
- **Lack of assistance for transitioning from institutional settings to integrated housing**

- **Lack of local or regional cooperation**
- **Land use and zoning laws**
- **Lending discrimination**
- **Location of accessible housing**
- **Loss of Affordable Housing**
- **Occupancy codes and restrictions**
- **Regulatory barriers to providing housing and supportive services for persons with disabilities**
- **Source of income discrimination**
- **State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings**
- **Other**

The following are contributing factors to disability and access issues in Corpus Christi listed in priority order.

LACK OF AFFORDABLE, ACCESSIBLE HOUSING IN A RANGE OF UNIT SIZES

Corpus Christi has an aging population, with a growing number of residents with disabilities and low incomes. However, the city does not have enough affordable and accessible housing units to match the increasing demand. Stakeholders believe that people with disabilities are not regarded as a valued demographic and say that it is more profitable for developers to build new market-rate housing units in areas that are underdeveloped outside the core of the city. Stakeholders noted that provision of greater affordable housing units in the city center where there is higher access to public services such as transportation is important for individuals with disabilities and would help meet excess demand.

LOCATION OF ACCESSIBLE HOUSING

Most of the accessible housing units are located near the city center in the east and northeast areas of the city, represented on city documents as districts 1 and 3. These districts also offer the highest percentage of HCV units. The City of Corpus Christi Human Relations Division lists eight privately-owned affordable housing developments for persons who are elderly or disabled which are also primarily near the city center. CCHA also manages over 1,800 units and is currently accepting Section 8 Project-Based Voucher waiting list applications for the elderly, disabled and very low to extremely low-income families. Data is not available on where accessible housing exists through private landlords.

LACK OF ASSISTANCE FOR HOUSING ACCESSIBILITY MODIFICATIONS

CBCIL provides accessible home modifications to low income people with disabilities. A note on the CBCIL website indicates that all services are contingent on funding availability. In 2015, CBCIL received a grant for \$100,000 from the Community Development Block Grant (CDBG) Program to provide such modifications.

Senior residents in focus groups noted difficulty getting assistance to install modifications to their homes. Many of them rely on their children to help them install modifications or install the modifications themselves. Quite a few respondents indicate that they need modifications to their residence for a disability but did not know how to request for them.

STATE OR LOCAL LAWS, POLICIES, OR PRACTICES THAT DISCOURAGE INDIVIDUALS WITH DISABILITIES FROM LIVING IN APARTMENTS, FAMILY HOMES, SUPPORTIVE HOUSING, SHARED HOUSING AND OTHER INTEGRATED SETTINGS

Section 24-90 of the code of ordinances for the City of Corpus Christi provides details to protect participation of individuals with a disability, consistent with requirements of federal and state laws and in compliance with the Americans with Disabilities Act. Stakeholders noted the lack of available accessible and affordable apartment units which may discourage some residents with disabilities from living in apartments. Stakeholders expressed that future development plans for Corpus Christi will likely have to be adjusted to accommodate more high density single-family residential and multi-family residential zoning. While Corpus Christi code allows congregate living for six or fewer residents as an acceptable use for a residentially zoned property, the development of congregate homes for seven or more individuals who are physically or mentally disabled would require land zoned for Public and Civic use.

ACCESS TO PUBLICLY SUPPORTED HOUSING FOR PERSONS WITH DISABILITIES

Corpus Christi has 5,216 publicly supported housing units and about 23 percent provide housing for persons with disabilities. Nationally 42 percent of residents in publicly supported housing have a disability and in Texas 38 percent have a disability. Corpus Christi has a higher proportion of residents with disabilities (13.9 percent) than the state and nation (11.6 percent each). Stakeholders noted that 91 accessible public housing units are available in Corpus Christi and that there is little turnover in these units resulting in long wait times for an accessible unit. Additionally, stakeholders noted that public housing infrastructure is dated and does not meet all ADA requirements.

The quantity of individuals with disabilities and the proportion of public housing that is occupied by individuals with disabilities compared to state and national statistics along with stakeholder input suggests that persons with disabilities have lower access to public housing in Corpus Christi than their counterparts in Texas and the United States as a whole. Moreover, the highest volume

of fair housing complaints in Corpus Christi is regarding modifications for persons with disabilities.

LACK OF AFFORDABLE IN-HOME OR COMMUNITY-BASED SUPPORTIVE SERVICES

Despite a growing number of senior residents with disabilities in Corpus Christi, stakeholders do not think the city has sufficient services to provide in-home or community-based support to these residents. CBCIL provides community living assistance and support services to residents with disabilities; however, representatives noted that additional support services are needed. The city has eight accessible senior centers, three of which are located in City Council Districts 4 and 5 on the south side while the remaining are spread across the north and northeast parts of the city. Meals on Wheels provides congregate meals at each of the senior centers.

V.E. FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, AND RESOURCES

ANALYSIS

a) List and summarize any of the following that have not been resolved:

- A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
- A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;
- Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;
- A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;
- A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or
- A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

As discussed earlier in this report, implementation is underway for the Texas Department of Transportation, City of Corpus Christi, Port Authority, and Corpus Christi Housing Authority agreement to mitigate the impacts on the Hillcrest and Washington-Coles neighborhood as a result of the planned construction of a new harbor bridge. The agreement includes voluntary relocation for more than 500 households, moving cost assistance, financial assistance for neighborhood churches and small businesses, improvements to the Dr. H.J. Williams Memorial Park in Hillcrest, and a new historic park in Washington-Coles. No other unresolved items relating to fair housing, nondiscrimination, or civil rights are pending for the City of Corpus Christi.

The City of Corpus Christi Human Relations Division (CCHRD) is a HUD-certified Fair Housing Assistance Program (FHAP) responsible for investigating fair housing complaints and enforcing violations in Corpus Christi. Corpus Christi residents may present fair housing complaints to the U.S. Department of Housing and Urban Development (HUD), the Texas Workforce Commission (TWC), or the local FHAP office.

The table below shows the number of cases filed by HUD and the number filed by the FHAP office for the years shown. A “case” refers to any formal complaint or claim that meets criteria for a fair housing complaint and is investigated. During this period, no cases were investigated by TWC. TWC will refer fair housing inquiries to the Corpus Christi FHAP if it is jurisdictional to that office.

The numbers in the table below do not include inquiries that do not meet the threshold elements of a complaint or claim.

Fair Housing Cases

FY Filed	Number of Filed Cases		
	HUD	FHAP	Total
FY 2015	2	8	10
FY 2016	4	7	11
FY 2017	5	8	13
Total	11	23	34

Source: Texas Workforce Commission.

In fiscal year 2017, the Corpus Christi FHAP office reported receiving 197 inquiries, opening 11 new cases, and closing 12 cases. Four of the cases closed were successfully conciliated. The difference between the TWC data and the FHAP data regarding new cases is unknown.

The Corpus Christi FHAP office must meet performance metrics established by HUD. Guidance from HUD to FHAP offices dated February 23, 2017, indicates that the minimum requirements for a "reasonable number of complaints" processed for a city the size of Corpus Christi is 13 complaints annually.

b) Describe any state or local fair housing laws. What characteristics are protected under each law?

The following state and local laws are relevant to fair housing.

TEXAS FAIR HOUSING ACT

The Texas Fair Housing Act of 1993 prohibits discriminatory housing practices in the sale, rental, and financing of dwellings on the basis of race, religion, color, sex, national origin, disability (mental or physical), and familial status (presence of a child under age 18 living with parents or legal custodians, person securing custody of children under 18, or a pregnant woman). The act is considered by the U.S. Department of Housing and Urban Development (HUD) to be substantially equivalent to the Fair Housing Act of 1968. State fair housing laws enable state government to enforce violations, rather than relying on federal enforcement.

TEXAS SENATE BILL 267

Senate Bill 267, passed May 23, 2015 and signed into law on June 19, 2015, prohibits municipalities and counties from adopting or enforcing any ordinance or regulation prohibiting property owners from refusing to lease or rent to a person on the basis of source of income, including funding from a federal housing assistance program. The legislation is presently being challenged in U.S. District Court on the basis of claims that it has disparate impact on minorities

and is therefore in violation of the Fair Housing Act of 1968. The law remains in force while under challenge. According to the 2013-2017 Corpus Christi Consolidated Plan, 75 percent of voucher holders in Corpus Christi are Hispanic, suggesting that this form of discrimination creates a disparate impact on individuals who are Hispanic.

CORPUS CHRISTI CODE OF ORDINANCES

Article III of the Corpus Christi Code of Ordinances protects the “right of each individual to provide for himself and his/her family a dwelling according to his/her own choosing.” The ordinance prohibits discrimination based upon race, color, sex, religion, disability (mental or physical), and familial status (presence of a child under age 18 living with parents or legal custodians, person securing custody of children under 18, or a pregnant woman), or national origin. The ordinance is considered by HUD to be substantially equivalent to the Fair Housing Act of 1968. Local fair housing laws enable local government to enforce violations rather than relying on federal enforcement.

CORPUS CHRISTI PROPERTY MAINTENANCE CODE

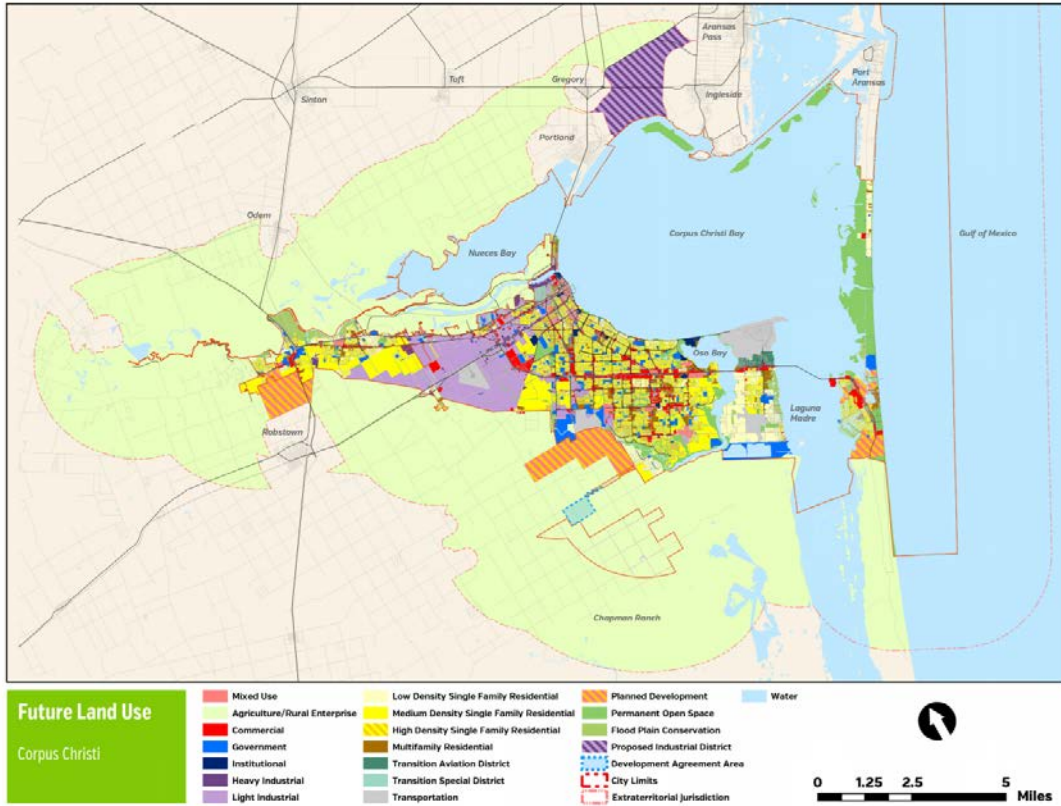
Section 101 of the Corpus Christi Property Maintenance Code prohibits code enforcement on the basis of race, color, sex, religion, age, disability, national origin, sexual orientation, gender identity. This stipulation protects residents from being singled out for code enforcement activities including search and seizure, injunction, and court proceedings on the basis of the above characteristics.

LAND USE AND ZONING LAWS

The Corpus Christi Unified Development Code includes group homes for six or fewer residents as an acceptable principle use for a residentially zoned property. A group home for seven or more individuals who are physically or mentally disabled which is not considered a single-family residence falls under social service zoning in the Public and Civic Use Category. Group homes are common housing arrangements for individuals who are disabled and the availability of such living arrangements is important for such individuals to have access to housing opportunities.

Map V-7 shows the Future Land Use map outlined in the 2015 comprehensive plan for Corpus Christi, entitled *Plan CC*. The map shows that high density single family residential and multi-family residential zoning is relatively sparse. Stakeholders interviewed for the Assessment of Fair Housing indicate that zoning changes are needed to allow for denser infill development, enabling multiple units to be built on single-family lots in residential neighborhoods, but generally believe that the city is receptive and easy to work with on changing zoning rules.

Map V-7 Future Land Use



c) Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them

The following agencies and organizations provide fair housing information, outreach, and enforcement:

TEXAS WORKFORCE COMMISSION CIVIL RIGHTS DIVISION

The Texas Workforce Commission Civil Rights Division (TWCCRD) serves as the state Fair Housing Assistance Program (FHAP) authorized to seek and grant relief, as well as initiate civil proceedings with respect to unlawful housing practices. TWCCRD may defer proceedings and refer complaints to a municipality which is certified by HUD as a FHAP; Corpus Christi has a certified FHAP office.

CITY OF CORPUS CHRISTI HUMAN RELATIONS DIVISION

The City of Corpus Christi Human Relations Division (CCHRD) is the HUD certified FHAP responsible for investigating fair housing complaints and enforcing violations. This certification makes CCHRD eligible for contribution funds from HUD for administrative costs, complaint processing, securing external partnership, special enforcement efforts, and training. Corpus

Christi is one of five local FHAP offices in the state of Texas. In fiscal year 2017, the department processed 197 inquiries, opened 12 cases, four of which were successfully conciliated. In addition to investigating complaints, FHAP office staff conduct outreach and attend community events to educate the community on fair housing issues. Between July 1, 2016, and July 1, 2017, FHAP office staff conducted 41 outreach activities, including attendance at 18 events.

CORPUS CHRISTI HOUSING AUTHORITY

The Corpus Christi Housing Authority (CCHA) has not yet adopted a final version of its 2017 – 2021 Five-Year Public Housing Agency Plan. The draft 2017 – 2021 Five-Year Public Housing Agency Plan notes four objectives with regard to ensuring equal opportunity and affirmatively furthering fair housing: ensuring access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability; ensuring access to a suitable living environment regardless of these characteristics; ensuring accessible housing to persons with all disabilities regardless of unit size required; and encouraging and counseling housing choice voucher (HCV) applicants to consider housing choices in high opportunity areas. The plan notes that these objectives are met through the CCHA admissions and continued occupancy policy (ACOP) document as well as educational HCV program briefings at initial lease and recertification. The ACOP includes CCHA nondiscrimination policies, policies related to persons with disabilities, improving access to services for persons with limited English proficiency, and occupancy standards.

CATHOLIC CHARITIES OF CORPUS CHRISTI

The housing counseling unit of Catholic Charities of Corpus Christi provides housing counseling including a range of services which promote family and individual self-sufficiency and neighborhood stability by eliminating educational, financial, and psychological/emotional barriers to successful home ownership. Fair housing education is among the services provided by the department.

ADDITIONAL INFORMATION

- a) **Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.**
- b) **The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.**

The resident survey conducted for this Assessment of Fair Housing is relevant to fair housing enforcement, outreach capacity, and resources in Corpus Christi. Seventeen percent of survey respondents indicate that they have been turned down for a mortgage. A majority believe that they were turned down because their credit score was too low, although seven residents believe their mortgage application was turned down for discriminatory reasons on the basis of familial status, religion, race/ethnicity, gender, or disability. Fifteen residents say their real estate agent did not show them all of the places they were interested in when looking for a house or condo to buy.

Nine percent of respondents have experienced a rental application rejection, more than half of whom believe it was because of their low credit score. Twelve residents believe their rental applications were turned down for discriminatory reasons, on the basis of familial status, disability, race, or color. Others believe it was because of ethnicity: as one respondent writes, “When I called and used my Spanish surname I was told there were no units, 5 minutes later, using my Anglo maiden name, I was offered the apartment.” Out of 192 respondents, nine explicitly say that they have been discriminated against regarding access to housing, based on familial status, disability, race/ethnicity, or color. Another respondent reports having been turned down because they were previously homeless.

Forty-eight percent of respondents say they do not know how to file a housing complaint, and many say they do not know who to talk to if they believe they have been discriminated against while looking for housing. Of the 190 residents who responded, 33.2 percent say they do not trust that a housing complaint would be addressed if they were to file one.

FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, AND RESOURCES CONTRIBUTING FACTORS

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- **Lack of local private fair housing outreach and enforcement**
- **Lack of local public fair housing enforcement**
- **Lack of resources for fair housing agencies and organizations**
- **Lack of state or local fair housing laws**
- **Unresolved violations of fair housing or civil rights law**
- **Other**

LACK OF LOCAL PRIVATE FAIR HOUSING OUTREACH AND ENFORCEMENT

Although the Corpus Christi FHAP conducts considerable outreach on fair housing issues and topics, and perhaps because of this, only Catholic Charities was identified as a private provider of fair housing outreach in the community.

LACK OF STATE OR LOCAL FAIR HOUSING LAWS

Texas Senate Bill 267, passed May 23, 2015 and signed into law on June 19, 2015, prevents municipalities from passing ordinances which prohibit source of income discrimination in rental housing. According to Affordable Housing Online, source of income discrimination is illegal in the District of Columbia, eight states, and many counties throughout the country. The State of Texas also does not provide statewide protections for housing discrimination based on sexual orientation, although the cities of Dallas, Austin, Fort Worth, and Plano have added this protection to local ordinance. The protection is also provided in the District of Columbia and at least 21 other states according to HUD.

VI Fair Housing Goals and Priorities

VI FAIR HOUSING GOALS AND PRIORITIES

PRIORITIZATION OF CONTRIBUTING FACTORS

- a) **For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.**

The table below shows the fair housing issues that are discussed in this Assessment of Fair Housing (AFH). Contributing factors for each issue are shown in order of priority with justification given for the relative prioritization of each. Priority is indicated by rank, with “1” being the highest priority.

Fair Housing Issues and Contributing Factors in the City of Corpus Christi		
Fair Housing Issues	Contributing Factors (by priority level)	Justification of Prioritization
Segregation/Integration	<ol style="list-style-type: none"> 1. Location and type of affordable housing 2. Lack of public investments in specific neighborhoods, including services or amenities 3. Lack of community revitalization strategies 4. Displacement of residents due to economic pressures 5. Private discrimination 6. Source of income discrimination 7. Community opposition 	<ol style="list-style-type: none"> 1. Affordable housing in Corpus Christi is not evenly distributed throughout the city, and public housing units are concentrated in the north-central area of the city, especially in census tract 15. Because affordable housing is mostly in segregated areas instead of the northwestern Calallen area and the south side, the location of affordable housing can contribute to segregation. 2. Stakeholders say that services and amenities, including proficient public schools, are often concentrated on the south side of Corpus Christi, while many jobs are concentrated near refineries in the west and northwest. Because areas with jobs are mostly home to Hispanic and African American residents, financial pressures can further perpetuate segregation. 3. Stakeholders note that most development in Corpus Christi is occurring on the south side and the west side, rather than in areas with dilapidated homes like the north side and southeast. According to stakeholders, the city has historically had few tangible strategies for revitalization in racially or ethnically concentrated areas of poverty (R/ECAPs) and other areas in the north of the city. 4. Comments received from stakeholders during interviews, focus groups, and survey responses, suggest that private discrimination based on protected class occurs in the City of Corpus Christi, which furthers segregation. 5. Corpus Christi is located near many oil refineries, and the industrial environment can make nearby residential areas, including the historically segregated Hillcrest/Washington-Coles community, undesirable. This has been exacerbated by the proposed Harbor Bridge project, which would cut through these areas and displace many residents. 6. Texas Bill SB 267 allows landlords to turn down lease applicants who have Section 8 vouchers. This can contribute to segregation because it limits the housing choice of residents in segregated areas, as evidenced by the difficulty residents of the D. N. Leathers public housing complex had redeeming their vouchers in other neighborhoods after the complex was demolished. 7. Stakeholders believe that members of the community are not knowledgeable about affordable housing, which can create a “Not in My Backyard” (NIMBY) attitude that deters developers from building affordable housing and multi-family housing on the southern and northwest areas of the city.

Fair Housing Issues and Contributing Factors in the City of Corpus Christi

Fair Housing Issues	Contributing Factors (by priority level)	Justification of Prioritization
Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)	<ol style="list-style-type: none"> 1. Lack of public investments in specific neighborhoods, including services of amenities 2. Lack of private investments in specific neighborhoods 3. Source of income discrimination 4. Private discrimination 5. Deteriorated or abandoned properties 	<ol style="list-style-type: none"> 1. Stakeholders mention that the city does not provide sufficient attention to the Washington-Coles and Hillcrest neighborhoods, designed as R/ECAPs. Although these areas are shown to have limited access to opportunity, some stakeholders believe the city does not make a deliberate effort to address this disparity. 2. Since many R/ECAPs are near industrial areas, residents in R/ECAPs can be affected by the operations of private companies, such as the Ergon Asphalt & Emulsions leak that disproportionately affected the water supply of R/ECAP residents. Stakeholders believe these companies should be more accountable for their environmental and economic effects. 3. Residents in R/ECAPs can face difficulty redeeming Section 8 vouchers due to source of income discrimination, which can limit their housing choice. 4. Comments received from stakeholders during interviews, focus groups, and survey responses, suggest that private discrimination based on protected class occurs in the City of Corpus Christi, which furthers segregation. 5. Stakeholders say that neighborhoods in the north and southeast areas of the city, including the R/ECAPs on U.S. Department of Housing and Urban Development (HUD) maps, are often home to low-quality, dilapidated properties.
Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Location and type of affordable housing 2. Location of employers 3. Location of environmental health hazards 4. Location of proficient schools and school assignment policies 5. Lack of regional cooperation 6. Private discrimination 7. Source of income discrimination 8. Loss of affordable housing 9. Availability, type, frequency, and reliability of public transportation 	<ol style="list-style-type: none"> 1. Stakeholders agree that a shortage of affordable housing for both renters and homebuyers exists in Corpus Christi, with most affordable housing concentrated in the northern and western areas of the city. 2. According to HUD data, areas of Corpus Christi with high job proximity are generally associated with lower school proficiency. Employers are mostly located in the west and northwest of the city, along Interstate 37. 3. Corpus Christi is an area with heavy industry, including refineries and chemical plants. Stakeholders say that neighborhoods on the north and west side that are in close proximity to industry have issues with decreased property value and health concerns related to air and soil quality. 4. Stakeholders report that most good schools in Corpus Christi are concentrated in the south, while most jobs are concentrated in the west and northwest. HUD data show that residents of Mexican origin are concentrated in census tracts with lower school proficiency. 5. Stakeholders say that public officials have not made adequate efforts to educate communities on the benefits of affordable housing before launching a project. In addition, community engagement and communication relating to the Harbor Bridge project was considered inadequate by some stakeholders. 6. Comments received from stakeholders during interviews, focus groups, and survey responses, suggest that private discrimination based on protected class occurs in the City of Corpus Christi, which furthers segregation. 7. Stakeholders report that tenant-based vouchers are frequently turned down because landlords do not accept vouchers as a form of payment. This can limit housing choice for residents in areas of low opportunity. 8. The proposed Harbor Bridge project led to displacement of residents from the 122-unit D.N. Leathers I public housing project. While this loss was offset with housing choice vouchers, other factors have contributed to difficulty for residents to find replacement housing. 9. Stakeholders say that although public transportation is available in the city, large areas of City Council Districts 4 and 5 are not connected to public transit networks.

Fair Housing Issues and Contributing Factors in the City of Corpus Christi

Fair Housing Issues	Contributing Factors (by priority level)	Justification of Prioritization
Disproportionate Housing Needs	<ol style="list-style-type: none"> 1. Lack of public investments in specific neighborhoods, including services or amenities 2. Lack of private investments in specific neighborhoods 3. Displacement of residents due to economic pressures 4. Source of income discrimination 5. Loss of affordable housing 	<ol style="list-style-type: none"> 1. After three years without a planning department, Corpus Christi re-established the department in February 2017. Although the new department is working on area development plans, some stakeholders believe the city has historically had few planning efforts targeted to communities with disproportionate need. 2. According to stakeholders, estimates of affordability can be skewed by the large variation in incomes in Corpus Christi, particularly from high earners who work at oil refineries near the city. Stakeholders say that this can discourage affordable housing development by giving a misleading indication of housing costs. 3. Projects such as the proposed Harbor Bridge have contributed to the displacement of residents in Corpus Christi; although affected residents successfully filed a civil rights complaint about the proposed project, the effectiveness of relocation programs remains to be seen. 4. Individuals using vouchers are often turned down by private landlords who do not accept them, limiting the housing choice of Corpus Christi residents. 5. The demolition of 122 units in the Leathers I public housing complex led to the displacement of many residents.
Publicly Supported Housing Location and Occupancy	<ol style="list-style-type: none"> 1. Lack of public investments in specific neighborhoods, including services of amenities 2. Impediments to mobility 3. Lack of regional or local cooperation 4. Community opposition 	<ol style="list-style-type: none"> 1. In the north-central area of the city, which has the highest concentration of publicly supported units, residents have low access to proficient schools and other public services. 2. According to stakeholders, redeeming housing choice vouchers is difficult in Corpus Christi, often due to source of income discrimination from landlords. Although the Corpus Christi Housing Authority (CCHA) has implemented some mobility counseling, the planned conversion of more units to voucher units will only increase the need for active measures for improving housing mobility. 3. Stakeholders mention that local policymakers are interested in publicly supported housing, but they are often not informed about the most effective uses of city resources. More cooperation between local government, nonprofits, and the public housing agency could ensure that resources are distributed appropriately and that policies are aligned around common goals. 4. Stakeholders report community opposition to the development of new publicly supported housing units that limits the supply and location of these units in Corpus Christi.
Disabilities and Access	<ol style="list-style-type: none"> 1. Lack of affordable, accessible housing in a range of unit sizes 2. Location of accessible housing 3. Lack of assistance for housing accessibility modifications 4. State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, 	<ol style="list-style-type: none"> 1. Stakeholders believe that residents with disabilities are not sufficiently valued and note that the limited supply of affordable and accessible units is not sufficient to meet the needs of individuals with disabilities and the aging population. 2. Most accessible housing units in Corpus Christi are located in the northeast section of the city (City Council Districts 1 and 3). 3. Focus group and survey participants noted the difficulty in getting assistance to install modifications to their homes, with several respondents indicating that they need modifications but do not know how to request them. 4. Although Section 24-90 of the code of ordinances for the City of Corpus Christi provides details to protect participation of individuals with a disability in compliance with the Americans with Disabilities Act, stakeholders note that future development plans for Corpus Christi will likely have to be adjusted to accommodate more high density single- family residential and multi-family residential zoning. 5. Twenty-three percent of publicly supported housing units in Corpus Christi provide housing for residents with disabilities, compared with 38 percent of publicly supported units in Texas and 42 percent nationally. Stakeholders also note that the low rate of turnover for accessible units in Corpus Christi can lead to long wait times. 6. Despite a growing number of senior residents with disabilities in Corpus Christi, stakeholders do not think the city has sufficient services to provide in-home or community-based support to these residents. Services offered include community living assistance from the Coastal Bend Center for Independent Living (CBCIL) and eight accessible senior centers offering congregate meals from Meals on Wheels.

Fair Housing Issues and Contributing Factors in the City of Corpus Christi

Fair Housing Issues	Contributing Factors (by priority level)	Justification of Prioritization
	shared housing and other integrated settings 5. Access to publicly supported housing for persons with disability 6. Lack of affordable in-home or community-based supported service	
Fair Housing Enforcement, Outreach Capacity, and Resources	1. Lack of local private fair housing outreach and enforcement 2. Lack of state or local fair housing laws	1. Although the Corpus Christi FHAP conducts considerable outreach on fair housing issues and topics, and perhaps because of this, only one private provider of fair housing outreach was identified in the community. 2. Unlike some other states, Texas does not offer legal protection against source of income discrimination due to Texas bill S.B. 267. Texas also does not provide statewide protection for housing discrimination based on sexual orientation, although the cities of Dallas, Austin, Fort Worth, and Plano have added this protection to local ordinances

FAIR HOUSING GOALS

- a) **For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.**

The table below shows the fair housing goals for the City of Corpus Christi based on the fair housing issues and contributing factors that are discussed in this AFH. Metrics, milestones, and corresponding timeframes are identified for each goal.

Fair Housing Goals for the City of Corpus Christi

Fair Housing Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participants
<p>1. Expand development of affordable housing in high opportunity, environmentally healthy areas of Corpus Christi.</p>	<ul style="list-style-type: none"> ▪ Location and type of affordable housing ▪ Deteriorated or abandoned properties ▪ Lack of private investments in specific neighborhoods ▪ Loss of affordable housing ▪ Community opposition ▪ Lack of affordable, accessible housing in a range of unit sizes 	<ul style="list-style-type: none"> ▪ Segregation/Integration ▪ R/ECAPs ▪ Disparities in Access to Opportunity ▪ Disproportionate Housing Needs ▪ Disabilities and Access 	<ul style="list-style-type: none"> ▪ By the end of 2018, the city will meet with local non-profit service providers, regional housing developers, and other stakeholder, to develop a strategy for increasing the availability of affordable housing in Corpus Christi over the next 10 to 20 years. ▪ By the end of 2019, the city will identify and prioritize incentives available to support affordable housing development in high opportunity areas. ▪ By the end of 2019, the city will identify publicly-owned land in high opportunity, environmentally healthy areas that can be reserved for affordable housing, including land currently owned by CCHA. ▪ By the end of 2019, the city will review the best use of Type A funds for housing and present recommendations to the City Council. ▪ By the end of 2020, the city will identify reforms to land use and zoning regulations that will remove barriers to the development of affordable housing. ▪ By the end of 2020, in preparation for a new AFH, the City of Corpus Christi will review patterns of segregation in the city and the policies and practices that have led to recent increases in segregation. 	<ul style="list-style-type: none"> ▪ City of Corpus Christi Housing and Community Development Department ▪ City of Corpus Christi Planning Department ▪ Local nonprofits ▪ Residential housing developers ▪ CHDOs
<p><u>Discussion:</u> According to stakeholders, affordable housing in Corpus Christi is insufficient and is mostly concentrated in the northern and western areas of the city. Stakeholders note that the city lacks Community Development Corporation (CDCs) and Community Housing Development Organizations (CHDOs) that could coordinate affordable housing development. Stakeholders also report that a general lack of knowledge about affordable housing can lead to a significant “Not in My Backyard” (NIMBY) attitude toward affordable housing in some neighborhoods.</p>				
<p>2. Educate landlords on fair housing issues and laws.</p>	<ul style="list-style-type: none"> ▪ Source of income discrimination ▪ Private discrimination ▪ Lack of access to opportunity due to high housing costs ▪ Impediments to mobility 	<ul style="list-style-type: none"> ▪ Segregation/Integration ▪ R/ECAPs ▪ Disparities in Access to Opportunity ▪ Disproportionate Housing Needs ▪ Publicly Supported Housing Location and Occupancy 	<ul style="list-style-type: none"> ▪ By the end of 2018, begin a marketing and education campaign to landlords about fair housing issues and laws. ▪ By 2019, the city will develop a process to assist local property owners in completing the Affirmative Fair Housing Marketing Plan (AFHMP). ▪ The city will continue to assist with relocation efforts for residents affected by the proposed Harbor Bridge project. 	<ul style="list-style-type: none"> ▪ City of Corpus Christi Housing and Community Development Department ▪ Corpus Christi Human Relations Division ▪ Corpus Christi Housing Authority ▪ Local property management

Fair Housing Goals for the City of Corpus Christi				
Fair Housing Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participants
				<ul style="list-style-type: none"> companies and associations Non-profit organizations
<p>Discussion: Stakeholders report that tenant-based vouchers are frequently turned down because landlords do not accept vouchers as a form of payment, limiting housing choice. Housing discrimination based on protected class was cited by a number of stakeholders during the public participation process.</p>				
<p>3. Improve access to public services and amenities in low opportunity areas of Corpus Christi.</p>	<ul style="list-style-type: none"> Lack of public investments in specific neighborhoods, including services or amenities Lack of community revitalization strategies Location of proficient schools and school assignment policies Availability, type, frequency, and reliability of public transportation 	<ul style="list-style-type: none"> Segregation/Integration R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Publicly Supported Housing Location and Occupancy 	<ul style="list-style-type: none"> By the end of 2018, the city will identify and invite a representative from the public transportation provider to participate in on-going stakeholder meetings related to housing and economic development planning efforts. By the end of 2019, the city will create a strategy to increase public transportation access for residents in City Council Districts 4 and 5. By 2020, expand the area development planning initiative through the Corpus Christi Planning Department by completing existing plans and initiating additional planning processes in low opportunity areas. By the end of 2021, the city will consider community revitalization strategies for at least three areas with low access to opportunity. 	<ul style="list-style-type: none"> City of Corpus Christi Housing and Community Development Department City of Corpus Christi Planning Department Corpus Christi Regional Transportation Authority
<p>Discussion: Public services and amenities are not evenly distributed throughout Corpus Christi. As shown in HUD data, proficient schools are on the south side of the city, but employment opportunities are mostly near the west side and “refinery row” on the north side. Public transportation is also available in the northern and western parts of the city but not in large parts of City Council Districts 4 and 5. Housing discrimination based on protected class was cited by a number of stakeholders during the public participation process.</p>				
<p>4. Increase the number of accessible housing units for people with disabilities.</p>	<ul style="list-style-type: none"> Lack of affordable, accessible units in a range of unit sizes Location of accessible housing Access to publicly supported housing for persons with disability Location and type of affordable housing 	<ul style="list-style-type: none"> Disabilities and Access Disparities in Access to Opportunity 	<ul style="list-style-type: none"> By the end of 2019, complete an inventory of outstanding ADA deficiencies in city-owned facilities and develop a plan for bringing the properties into compliance. By the end of 2019, increase the number of houses modified for people with disabilities through the CDBG housing rehabilitation program. 	<ul style="list-style-type: none"> City of Corpus Christi Housing and Community Development Department City of Corpus Christi Facilities Department

Fair Housing Goals for the City of Corpus Christi				
Fair Housing Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participants
<p><u>Discussion:</u> The limited supply of affordable and accessible units is not sufficient to meet the needs of individuals with disabilities and the aging population. Respondents to the resident survey note difficulties with getting assistance to install modifications to their homes, with several respondents indicating that they need modifications but do not know how to request them.</p>				
<p>5. Engage in a public awareness campaign to reduce community resistance to affordable housing in high opportunity areas.</p>	<ul style="list-style-type: none"> ▪ Lack of regional cooperation ▪ Lack of public investments in specific neighborhoods, including services or amenities ▪ Private discrimination ▪ Community opposition ▪ Lack of state or local fair housing laws ▪ Lack of local private fair housing outreach and enforcement 	<ul style="list-style-type: none"> ▪ Segregation/Integration ▪ R/ECAPs ▪ Disparities in Access to Opportunity ▪ Publicly Supported Housing Location and Occupancy ▪ Fair Housing Enforcement, Outreach Capacity, and Resource 	<ul style="list-style-type: none"> ▪ By the end of 2018, the city will hold at least one public forum in the Hillcrest/Washington-Coles area to obtain input from local residents. ▪ By the end of 2019, the city will meet with the Resident Advisory Board (RAB) of the Corpus Christi Housing Authority to gain input on fair housing issues in the city. ▪ By the end of 2019, the city will work with local nonprofits, housing developers, and other stakeholders to develop a plan for improving communication with city residents on issues related to fair housing. ▪ By the end of 2020, the city will engage in multiple public forums in high opportunity areas to engage with residents on the topic of affordable housing. 	<ul style="list-style-type: none"> ▪ City of Corpus Christi Housing and Community Development Department ▪ Corpus Christi Housing Authority ▪ Corpus Christi Housing Authority Resident Advisory Board ▪ Local nonprofits
<p><u>Discussion:</u> Stakeholders say that, although policymakers in Corpus Christi are interested in fair housing issues, they are sometimes uninformed about the most effective use of city resources. Stakeholders believe this is because of a lack of regional cooperation and because residents are not sufficiently involved in the decision-making process, as evidenced by the proposed Harbor Bridge project that did not seek input from Hillcrest and Washington-Coles residents. Housing discrimination based on protected class was cited by a number of stakeholders during the public participation process.</p>				

APPENDIX: PUBLIC COMMENTS RECEIVED

The attached table includes a summary of the comments received during the public hearing on October 10, 2017, and the public comment period from October 18, 2017 to November 20, 2017. The table indicates which comments were accepted and which were rejected.

Reponses to Comments Received During the Public Comment Period
By Source

Comment	Source of Comment	Comments Accepted?	If yes, how has the AFH been revised?	If no, why have these comments been rejected?
Housing changes as a result of Hurricane Harvey should be reviewed.	Texas Rio Grande Legal Aid, Comments during October 10, 2017 public hearing.	Yes	Additional detail regarding the impact of Hurricane Harvey has been incorporated.	
An extension should be granted for submission of the AFH.	Texas Rio Grande Legal Aid, Comments during October 10, 2017 public hearing.	No		The City of Corpus Christi is not requesting an extension from HUD.
How the Corpus Christi Housing Authority RAD conversion plans impact the AFH.	Texas Rio Grande Legal Aid, Comments during October 10, 2017 public hearing.	No		The Corpus Christi Housing Authority is not included in this AFH. This is an issue that may be addressed in the Corpus Christi Housing Authority (CCHA) AFH.
AFH should discuss Corpus Christi Public Housing Authority mobility counseling for residents.	Texas Rio Grande Legal Aid, Comments during October 10, 2017 public hearing.	No		The Corpus Christi Housing Authority is not included in this AFH. This is an issue that may be addressed in the CCHA AFH.
Will the City and the Corpus Christi Housing Authority work together on spending funds if CDBG-DR funds are received?	Texas Rio Grande Legal Aid, Comments during October 10, 2017 public hearing.	Yes	Additional detail regarding the impact of Hurricane Harvey has been incorporated.	
Environmental concerns need to be adequately addressed.	Texas Rio Grande Legal Aid, Comments during October 10, 2017 public hearing.	No		Supplemental environmental data from the EPA has been used in the AFH. The suggested resources may be reviewed for inclusion in a subsequent AFH.
This document is very close to excellent. The consulting firm provided a very comprehensive look at the state of Fair Housing and affordable housing in the City of Corpus Christi. Issues discussed by stakeholders and in focus groups were accurately reflected. The recommendations are realistic and very much in line with what many in our City have been saying is needed.	Coastal Bend Center for Independent Living, email to the Director of the Corpus Christi Housing and Community Development Department, dated November 20, 2017.	Yes	No changes to the report are needed.	
Housing goals should be more specific	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	Goals have been revised to be more specific.	
AFH questions are not answered.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		All AFH questions have been answered.
More local data and analysis needed.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		Local data available during the period in which the AFH was conducted is incorporated into the report as noted throughout the AFH.
References to Mustang Island need clarification.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	References to Mustang Island have been clarified throughout the AFH.	
Need more data and analysis on the impact of Hurricane Harvey. Extension of submission should be requested.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	Additional detail regarding the impact of Hurricane Harvey has been incorporated.	
Summary of Outreach Activities, pg. 9. Request extension to expand outreach as a result of Hurricane Harvey and get input on local impact of the hurricane.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		The impacts of Hurricane Harvey on the affordable housing market and the housing needs of residents may be explored in the Consolidate Plan that is due to HUD in August 2018.

Reponses to Comments Received During the Public Comment Period
By Source

Comment	Source of Comment	Comments Accepted?	If yes, how has the AFH been revised?	If no, why have these comments been rejected?
Summary of Outreach Activities, pg. 9. Issue more press releases about public input, including to Spanish-language media.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes		Additional detail about outreach activities has been included in the report.
Summary of Outreach Activities, pg. 9. Overall participation was low. More outreach needed.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		Sufficient effort was made during the course of the AFH to encourage participation and solicit input from the public. Survey responses were high relative to the population. Resident and stakeholder focus groups were well attended. The City made a significant effort in line with efforts in other similarly sized jurisdictions despite the budget and time constraints for completing the AFH.
Summary of Comments Received., pg. 12 and 58. Corrections recommended regarding details of Harbor Bridge mitigation agreement.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	Corrections have been made as indicated.	
Community participation limitations, pg. 25. Demographic information on focus groups is not included.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		Names and demographic information is not requested from focus group participants to ensure anonymity. The general characteristics of each focus group is described in considerable detail in the community participation section of the AFH.
Community participation limitations, pg. 25. No specific information about how outreach could be improved.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	Page 25 does include information about how outreach could be improved. This has been expanded.	
Assessment of past goals and actions, pg. 29. More detail requested regarding the demolition of two apartment complexes.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		This comment refers to actions taken by the Corpus Christi Housing Authority and may be included in their AFH.
School-related policies, pg. 67-68. Need local data in this section.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	A note has been added to the report to indicate that local school district transfer policies mirror the state policy.	
Environmental health index, pg. 62. More EPA data is needed and more data on highways.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		Supplemental environmental data from the EPA has been used in the AFH. The suggested resources can be reviewed for inclusion in a subsequent AFH.
Environmentally healthy neighborhood opportunities, pg. 81. Future city action should be included.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	Goals and strategies have been modified.	
Hurricane Harvey, pg. 96. More information on the impact of the hurricane is needed.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	Additional detail regarding the impact of Hurricane Harvey has been incorporated.	

Reponses to Comments Received During the Public Comment Period
By Source

Comment	Source of Comment	Comments Accepted?	If yes, how has the AFH been revised?	If no, why have these comments been rejected?
Hurricane Harvey, pg. 96. No data on the current demand for low-income housing is included.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		Demand for affordable housing is covered extensively in the City of Corpus Christi Consolidated Plan, which will be updated in August of 2018; this update may include additional information on the impact of Hurricane Harvey on affordable housing.
Disparities in Access to Opportunity, pg. 109. More details on RAD needed.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		The Corpus Christi Housing Authority is not included in this AFH. This is an issue that may be addressed in the CCHA AFH.
Disparities in Access to Opportunity, pg. 109. RAD conversion process needs clarification..	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		The Corpus Christi Housing Authority is not included in this AFH. This is an issue that may be addressed in the CCHA AFH.
Impediments to Mobility - Source of Income Discrimination, p. 111. Need more information on how these effects will be lessened.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	The goals have been revised to address this comment.	
Housing Accessibility, pg. 114. Need more information on geographic location of affordable units.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	This information has been added to the report.	
Housing Accessibility, pg. 114. More information needed on reasonable accommodation.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		This is the responsibility of the CCHA and may be addressed in the CCHA AFH.
Housing Accessibility, pg. 114. More information needed on number of people with disabilities who have applied for public housing and been denied due to a lack of units.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		The Corpus Christi Housing Authority is not included in this AFH. This is an issue that may be addressed in the CCHA AFH.
Transportation, pg. 120. More information is needed on travel time on bus routes.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		Calculating the information suggested would take an excessive amount of time and would unlikely change the conclusion reached that more frequent buses and more bus routes are needed.
Transportation, pg. 120. More information is needed on paratransit service and the three-day rule for scheduling a trip.		Yes	A note has been added to the report to indicate that there are no expectations granted to the three-day rule.	
Transportation, pg. 120. More information is needed on how bus routes impact mobility.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	Additional information added to this section of the report.	
City of Corpus Christi Human Relations Division, pg. 129. More information requested, numbers seem low.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	Additional information and clarification has been added to the report.	

Reponses to Comments Received During the Public Comment Period
By Source

Comment	Source of Comment	Comments Accepted?	If yes, how has the AFH been revised?	If no, why have these comments been rejected?
Corpus Christi Housing Authority, pg. 129. No information included on CCHA policies on victims of domestic violence. No information on CCHA notification policies, LEP policies, mobility counseling. Need information on policies to address NIMBY discrimination issues.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	No		The Corpus Christi Housing Authority is not included in this AFH. This is an issue that may be addressed in the CCHA AFH.
Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors, pg. 131. More info requested on fair housing outreach contributing factors.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	Three additional contributing factors have been added to the report related to private discrimination, private fair housing outreach, and domestic violence.	
Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors, pg. 131. The AFH should include a discussion of more factors and explain how the factors impact fair housing issues.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	Three additional contributing factors have been added to the report related to private discrimination, private fair housing outreach, and domestic violence.	
Fair Housing Goals, pg. 136. Goals 1 to 5 are too general.	Texas Rio Grande Legal Aid Letter to the Director of the Corpus Christi Housing and Community Development Department dated November 15, 2017.	Yes	Goals have been modified to be more specific.	
I.1. AFH does not identify media outlets used beyond city websites and social media accounts or describe any efforts made to reach the public beyond providing information to community stakeholders.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Additions have been made to more fully explain the public outreach process.	
I.2. No discussion of how input was solicited from people with disabilities or how the meetings and survey were made accessible.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Additions have been made to more fully explain the public outreach process.	
I.3 No detailed description of how outreach was designed to reach the LEP population. No indication that interpreters were provided at meetings and hearings, or that hearings or meetings were held in any language other than English.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Additions have been made to more fully explain the public outreach process.	
I.4 No clear notice regarding how to access the data or the AFH DRAFT in a language other than English or in an accessible format.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Making the AFH available in a language other than English is not required by HUD. Cost is a prohibiting consideration. The survey and other materials and communication were made available in Spanish. The report has been revised to more fully suggest how community outreach can be improved in the future.	
I.5 Outreach and participation process was not designed to or did not succeed in eliciting meaningful participation from populations that are typically underrepresented in the planning process.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		This AFH solicited and incorporated extensive input from typically underrepresented populations and that input, from the community survey, the focus groups, and many reports and data sources available at the local level, is incorporated throughout the report.

Responses to Comments Received During the Public Comment Period
By Source

Comment	Source of Comment	Comments Accepted?	If yes, how has the AFH been revised?	If no, why have these comments been rejected?
I. 6. No analysis of survey responses by protected class, which elides differences in experience between populations, and does not identify which populations need specific types of fair housing outreach and education.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		A survey is not required to be conducted for an AFH but was conducted by the City to increase opportunities for community involvement. In the survey conducted by the City, questions were asked to identify several protected classes, including race/ethnicity, family size, disability, and sex. In addition, when asked if the respondent had experienced discrimination, the survey further asked the respondent to select the protected class that indicated the reason they believed they were discriminated against. The survey analysis in the AFH discusses the information that could be gleaned from the survey.
I. 7. While the Draft AFH includes a summary of public comments received, it does not include a summary of any comments or views not accepted and the reasons why.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	This has been added.	
I. 8. The Draft AFH states that “[e]vacuation preparations for Hurricane Harvey began at the close of the survey period and no further attempts were made to solicit additional input.” According to the City’s Draft, the outreach process was incomplete.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	The report has been corrected to clarify that the public participation component of this AFH was fully complete prior to Hurricane Harvey.	
II. The AFH fails to include data, analysis, or public participation related to the impact of Hurricane Harvey.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Additional detail regarding the impact of Hurricane Harvey has been incorporated.	
III. The Assessment of Past Goals, Actions, and Strategies is Inadequate	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Including goals from the previous Consolidated Plan is not a HUD requirement and those previous affordable housing goals have been removed.	
IV. The AFH fails generally to use local data and local knowledge.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		This AFH solicited and incorporated extensive input from typically underrepresented populations and that input, from the community survey, the focus groups, and many reports and data sources available at the local level is incorporated throughout the report.
IV. The Fair Housing Analysis fails to focus on private discrimination based on protected class status.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Additional detail and a contributing factor have been included in the report.	
IV. The Fair Housing Analysis does not analyze whether source of income discrimination is also operating as a proxy for discrimination against protected classes,	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Additional information has been added to indicate the disparate impact on protected classes.	
IV. The AFH fails to identify land use, zoning, and other policies and processes that have contributed to and reinforce segregation and disparities in access to opportunity. The AFH does not include an analysis of the land use and zoning policies and decisions that have resulted in the location of heavy industry in communities of color, depressing home values and subjecting residents to environmental hazards.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		HUD provides limited direction on the extent of the land use and zoning analysis. The AFH includes information on land use and zoning related to high-density infill, group homes for individuals with disabilities, and future land use. The AFH also describes in detail the environmental issues faced by residents of the City. The next AFH may consider the extent to which the historical policies and processes have contributed to environmental hazards for residents.

Reponses to Comments Received During the Public Comment Period
By Source

Comment	Source of Comment	Comments Accepted?	If yes, how has the AFH been revised?	If no, why have these comments been rejected?
IV. 1 . Integration and Segregation: Segregation had been decreasing since 1990, but the 2010 data indicates that segregation is increasing. There is no analysis of the reason for this trend, which appears to be regional as well.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Goals and strategies have been modified to address this.	
IV. 2. The City has included some historical context for present patterns of segregation. While the included historical information is not sufficient, we commend the City for including it. Historical context has been notably and completely absent from other Texas AFHs we have reviewed.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	No revision necessary.	
3. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs): This analysis should include more historical context about past decisions that have led to the current conditions in R/ECAPs, and more analysis of the process by which these decisions are made.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		While this would be a useful analysis for the City of Corpus Christi to conduct, further analysis is beyond the scope of the AFH.
4. The draft repeatedly mentions “stakeholders” but does not generally specify within the responses to specific questions who those stakeholders are.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		It is clear in the AFH that the stakeholders refer to participants in the public participation process. Identifying stakeholders by name, affiliation, or other characteristics could potentially identify people. Participants were told during the community participation process that they would not be identified individually in the report to allow them to speak freely.
IV. 5. a. The analysis does not include local data or an analysis of how local school assignment and other policies impact local neighborhoods and protected classes.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		Collecting this data is beyond the scope of the AFH.
IV. 5. b. The AFH is clear that there is a connection between the location of jobs, the location of proficient schools, and access to public transportation. This connection is not addressed in the access to proficient schools analysis.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Revisions made to the report to provide the information that is available.	
IV. 6. The AFH includes information about the prevalence of domestic violence in Corpus Christi. However, there is no analysis of “[d]isplacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking” as a contributing factor and discrimination based on sex is not addressed in general. There should be more analysis of this contributing factor, for example, a discussion of how the Public Housing Authority (PHA) is implementing protections put in place by the Violence Against Women Act (VAWA) in the publicly supported housing section.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Three additional contributing factors have been added to the report related to private discrimination, private fair housing outreach, and domestic violence.	
IV. 7. a. The AFH states that there is no HUD-provided data showing the demographic composition of LIHTC developments.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	The AFH has been revised to include demographic information for LIHTC developments.	
IV. 7. b. The City’s failure to conduct a basic spatial analysis of the socioeconomic conditions of census tracts containing publicly supported housing and voucher holders downplays a pattern of segregation.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		The CCHA is not a party to this AFH. This further information may be addressed in the CCHA AFH.

Reponses to Comments Received During the Public Comment Period
By Source

Comment	Source of Comment	Comments Accepted?	If yes, how has the AFH been revised?	If no, why have these comments been rejected?
IV. 8. Improving the quality of housing stock does not address the fair housing issue, the location of affordable housing and disparate access to opportunity.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		The City agrees that improving the quality of housing stock does not address fair housing issues. However, In this section of the AFH, the City is given the opportunity to provide "other information relevant to its assessment of publicly supported housing." The information on improving the quality of public housing stock and assisting residents with choosing new housing is relevant to understanding efforts to reduce the housing problems discussed later in the report.
IV. 9. There is no information from residents or stakeholders about how the RAD process is proceeding and any potential fair housing issues.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		The Corpus Christi Housing Authority is not included in this AFH. This is an issue that may be addressed in the CCHA AFH.
IV. 10. There is no information about whether the mobility counseling CCHA provides is adequate or successful.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		The Corpus Christi Housing Authority is not included in this AFH. This is an issue that may be addressed in the CCHA AFH.
IV. 11. There is no analysis of policies and processes by which the City supports or opposes LIHTC applications under the State’s Qualified Allocation Plan (QAP). This is a critical contributing factor to the location of publicly supported housing.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Additional information has been added to the report.	
IV. 12. There is no discussion of whether public or private housing providers are providing reasonable accommodations for persons with disabilities. Nor does it describe or analyze the City or CCHA’s policies regarding reasonable accommodations, or how the City or CCHA notify residents that they can request reasonable accommodations.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		The extent to which the City provides reasonable accommodation is included in the AFH for City facilities and services. A discussion of issues faced by survey respondents and participants in interviews and focus groups is included in the report, suggesting that public and private housing providers are not providing sufficient reasonable accommodation. A reference is made to the CCHA ACOP; further information about the CCHA may be included in their AFH.
IV. 13. The AFH does not include information about the location of affordable accessible units and whether they are located in segregated areas or recaps. Nor does it describe the City or CCHA’s policies regarding reasonable accommodations.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	This analysis has been included in the AFH. The CCHA policies regarding reasonable accommodations may be addressed in their AFH.	
IV. 14. The fact that the City’s Comprehensive Plan includes as a goal, “[n]ew or renovated buildings, facilities, and open spaces that are required to comply with ADA (Americans with Disabilities Act) standards do comply,” is troubling. The AFH should include an analysis of which public facilities are not in compliance with the ADA and of the City’s process, including the inspection process, for ensuring that buildings, facilities, and open spaces are in compliance with the ADA.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	A goal has been added for the City to conduct this analysis.	
IV. 15. There is no analysis of complaint data from the Corpus Christi Human Rights Division, the Texas Workforce Commission, or HUD.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	Yes	Complaint data from TWC and HUD have been added.	
IV. 16. The PHA section should include an evaluation of protection from discrimination based on sexual orientation, gender identity, or marital status under HUD’s Equal Access Rule.	Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017	No		The Corpus Christi Housing Authority is not included in this AFH. This is an issue that may be addressed in the CCHA AFH.

Reponses to Comments Received During the Public Comment Period
By Source

Comment	Source of Comment	Comments Accepted?	If yes, how has the AFH been revised?	If no, why have these comments been rejected?
<p>17. The AFH asserts that “[n]o unresolved items relating to fair housing, nondiscrimination, or civil rights are pending for the City of Corpus Christi.”⁴² As mentioned in other sections of the AFH, the City is party to a Four Party Agreement resolving a civil rights complaint to the Department of Transportation regarding the proposed Harbor Bridge Project. The AFH should include analysis of the implementation of this Agreement.</p>	<p>Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017</p>	<p>Yes</p>	<p>This issue is discussed elsewhere in the report and the report has been revised to add this information in this section as well. It is beyond the scope of the AFH to analyze the implementation of the agreement.</p>	
<p>V. The Identification of Fair Housing Priorities, Goals, Strategies, and Actions is Inadequate. Multiple areas identified where metrics and milestones need to be more specific and concrete.</p>	<p>Texas Appleseed/Texas Low Income Housing Information Service Letter Dated November 20, 2017</p>	<p>Yes</p>	<p>Goals and strategies have been modified.</p>	