

Analysis of Impediments to Fair Housing Choice, 2024

City of Arlington, Texas



December 19, 2024

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Introduction

As part of the HUD consolidated planning process, states and entitlement communities receiving Community Development Block Grants (CDBG) must submit to HUD an Analysis of Impediments to Fair Housing Choice (AIFH).

In carrying out this local Analysis of Impediments to Fair Housing Choice, the City of Arlington utilized the following definition of Fair Housing Choice as outlined by HUD.

Arlington's Ordinance No. 06-082 declares the following Fair Housing Policy:

"It is hereby declared to be the policy of the City of Arlington to promote, through fair, orderly and lawful procedures, the opportunity for each person to obtain housing without regard to his/her race, color, religion, national origin, sex, disability or familial status. This policy is grounded upon a recognition of the right of every person to have access to adequate housing of his/her own choice without regard to race, color, religion, national origin, sex, disability or familial status. Further, this policy is based upon a recognition that the denial of such rights through considerations based upon race, color, religion, national origin, sex, disability or familial status is detrimental to the health, safety and welfare of the inhabitants of the City of Arlington and constitutes an unjust denial or deprivation of an inalienable right which is within the power and the proper responsibility of government to prevent."¹

As defined in The Fair Housing Planning Guide, the definitions of impediments to fair housing choice include:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices
- Any actions, omissions, or decisions which have the effect of restricting housing choices, or the availability of housing choices taken on the basis of race, color, religion, sex, disability, familial status, or national origin

I. The Analysis

A. Who Conducted

The following Analysis of Impediments to Fair Housing was conducted by Arlington, Texas, with the assistance of an independent consultant, Karen Dash Consulting LLC² of Wilmington, North Carolina (hereafter "study team.") The analysis was completed within the context of preparation for the HUD Consolidated Plan submitted for the jurisdiction for the 2025-2029 reporting period. The consultant also developed a stand-alone Housing Needs Assessment for the City of Arlington.

B. Participants

In all, the opinions of 285 community members informed the Consolidated Planning Process. In preparation of the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, and a separate Housing Needs Assessment, the City consulted with 30 agencies through five public meetings/focus groups (in-person with virtual participation options) and 23 key stakeholder interviews in September 2024. Twenty-nine people attended our series of public meetings, and 211 people completed a Community Survey.

The jurisdiction engaged in a robust process of including citizen participation within the Consolidated Planning process. Community surveys in English and Spanish, and notices of public meetings in English and Spanish, were distributed via the City's social media, website, and community partners. A local publication provided information about the survey and public meetings as well. The appendix provides a list of agencies consulted within the development of the Consolidated Plan and the Analysis of Impediments to Fair Housing.

C. Methodology Used

This analysis is premised on the assumption that people have a right to equal treatment in their search for a place to live and the City should take an active role in the community to help make life better for its citizens. The methodology, which was conducted concurrently with development with the Consolidated Plan, is detailed below.

<u>Review of Demographic, Income, and Employment/Workforce Data</u>: The team conducted an extensive analysis of the Demographics, income, and employment/workforce profile of the city, including a review of the geographic distribution of racial, ethnic, and income groups through detailed maps by census tract.

<u>Housing Profile</u>: The team analyzed the particular housing demographics and profile of Arlington, whose population has increased 19.7% since 2000. The team also consulted with government, housing, and real estate officials regarding their opinion of the Arlington area market. A much more detailed analysis of the Housing Market can be found in the stand-alone Arlington Housing Needs Assessment.

Public Outreach – Fair Housing Survey

The team also surveyed citizens regarding their experience with Fair Housing issues, as well as their awareness of Fair Housing laws and ways to seek assistance.

Evaluation of Arlington's Current Fair Housing Legal Status/Fair Housing Informational Programs -- Resources and Education

Through research and interviews, the team analyzed the City's current legal status. The team researched and evaluated the Fair Housing resources and programs offered by the City of Arlington.

<u>Fair Housing Complaints/Enforcement:</u> The team reviewed all complaints submitted to HUD, which are then investigated and resolved by the Texas Workforce Commission's Civil Rights Division. The team reviewed for any trends or patterns within the data, including the resolution of cases.

<u>Review of Fair Lending Data</u>: The team conducted a rigorous analysis of the Home Mortgage Disclosure Act (HMDA) 2023 lending data for Arlington residents available through the Consumer Financial Protection Bureau.

<u>Review of Arlington Policies and Programs</u>: The study team conducted a detailed review of the city's housing policies, zoning and planning codes, laws, and regulations, including in-depth discussions with key planning, housing, and other officials. Specifically, the team researched:

- a. Zoning and Land Use
- b. Development Impact Fees
- c. Building Codes (accessibility)
- d. Low Income Housing Tax Credit (LIHTC) Housing and Expirations
- e. Neighborhood Revitalization Strategy Areas (NRSA)
- f. Employment-Housing-Transportation Linkage
- g. Taxation
- h. Project-Based Vouchers

D. List of Acronyms and Definitional Note

The following acronyms are used throughout this report.

- ACS: American Community Survey
- ADU: Accessory Dwelling Unit (aka Secondary Living Unit, or SLU)
- AIFH: Analysis of Impediments to Fair Housing Choice
- CDBG: Community Development Block Grants
- CHAS: Comprehensive Housing Affordability Strategy
- HMDA: Home Mortgage Disclosure Act
- HUD: U.S. Department of Housing and Urban Development
- LIHTC: Low Income Housing Tax Credits
- NRSA: Neighborhood Revitalization Strategy Areas
- PBV: Project Based Vouchers
- SLU: Secondary Living Unit (aka Accessory Dwelling Unit, or ADU)

Please note: This report refers to the median values for some indicators. Median refers to the middle value of a range of values. It is different from the average. For example, if we consider five rents, \$900, \$1,000, \$1,150, \$1,400, and \$3,800, the average rent would be \$1,650, while the median rent would be \$1,150 (the middle value in the group.)

E. Conclusions

The City of Arlington has numerous programs and strategies in place to support every resident in searching for and accessing safe housing for themselves and their families. Several potential impediments were identified as possible barriers to fair housing, and they are included within the individual sections with recommendations offered for the City of Arlington's consideration.

In brief, these recommendations include:

- i. Expanding Fair Housing Education Information for residents in other languages, particularly in Arlington's immigrant communities
- j. Additional monitoring of Home Mortgage Disclosure Act Lending Data to determine whether lending practices are adversely affecting some groups
- k. It is possible that the Texas State Legislature will impose state standards related to minimum lot size and the increased development of ADUs within all City residential zoning districts within the next few years. Until that change takes place, the City might encourage increased density in some areas of Arlington, including considering minimum lot size standards, allowing for the development of Secondary Living Units (SDUs, also known as Accessory Dwelling Units, or ADUs), and other measures.
- I. The City might continue to educate the community on the possibility of upcoming state zoning changes and how they will impact communities, including the potential for increased density and the increased presence of multifamily housing. At the same time, Arlington can begin to promote some of the increased density practices and their benefits to the city.
- m. Arlington may consider the possibility of scaling impact fees further according to the assessed value of the property or new dwelling(s), including Secondary Living Units (SLUs) in order to make them more affordable, and to incentivize development of housing for low- to moderate-income families.
- n. The City could pilot a special Arlington On-Demand service that allows multiple stops for families dropping off children at daycare on their way to work. For example, all stops would have to be completed within a 30-60 minute timeframe.
- o. To supplement its on-demand services, Arlington could look to use higher-capacity vehicles to provide transit service along the most used public corridors to major employment centers within Arlington (e.g., the Entertainment District.)
- The City might also consider encouraging additional building incentives in potential areas of future public transit/corridors.

¹ https://www.arlingtontx.gov/files/assets/city/v/1/grants-management/documents/fair-housing-code-ordinance-21-034.pdf

²https://www.karendashconsulting.com/

II. Community Profile

A. Brief Overview of Arlington

Founded in 1876, Arlington, Texas is located in the Metroplex area of northern Texas, with neighboring Dallas to the east and Fort Worth to the west. The city is home to the University of Texas at Arlington (UTA), a major urban research university, as well as home to the Dallas Cowboys and Texas Rangers professional sports teams. General Motors, the Nuclear Regulatory Commission, Texas Health Resources, Six Flags over Texas, Mensa International, and D.R. Horton are some of the City's employers.

With a total area of 99.7 square miles, and a population of 398,431, the city is very densely populated. City officials estimate that the city is 94% built out.

Arlington is the 50th largest city in the U.S. and the 7th most populous city in the state of Texas.

B. Demographic Data

According to the US Census, Arlington's 2023 population was 398,431, up 1.1% from 2020. From 2000-2023, Arlington's population has increased 19.7%, with a peak in 2019.



Exhibit: Arlington Population Count

Source: Arlington Socioeconomic Profile, February 2024

Population by Age and Gender

By age group, individuals aged 20–24 make up the largest cohort, followed closely by those aged 25–29. According to the U.S. Census Bureau's American Community Survey (ACS), since 2020, the population segment growing the fastest is adults aged 65 and older, which has increased by 6.5%. In contrast, the population of children under age 5 has declined by 5.4% over the same period.



Exhibit: Citywide Age by Gender

Source: U.S Census Bureau, 2023, ACS 1-year estimates

Per the US Census, the average Arlington resident is:

- 33.1-year-old woman
- Non-Hispanic and White
- Born in Texas
- Has at least a high school diploma (or equivalent)
- Has a 27-minute commute to a job outside Arlington
- Lives in household with \$71,736 Income

Population by Race and Ethnicity

One of Arlington's greatest strengths is the diversity of its population. In 2024, Wallethub ranked Arlington the 5th most diverse city in the US. By race, the White population represents the greatest share of population (36%), followed by Black or African American (22%). Those of Hispanic or Latino ethnicity represent 31% of the population.



Exhibit: 2023 Citywide Race & Ethnicity by Percentage

Source: U.S Census Bureau, ACS 5-year estimates for Arlington

As the following maps will show, while the various racial/ethnic groups are represented within census tracts throughout the city – and particularly the Black or African American and Two or More Races populations – some racial groups are more concentrated in some areas of the City.

American Indian and Alaska Native Population by Census Tract, Arlington 2023 This map provides insight into the distribution of Arlington's American Indian and Alaska Native population, based on 2023 ACS 5-Year Estimates. While present in all areas of the city, higher concentrations can be observed in select census tracts, particularly in central and northern Arlington.

Recognizing population patterns supports efforts to ensure culturally inclusive housing, economic opportunities, and community engagement initiatives. By understanding demographic trends, Arlington can continue fostering a welcoming environment that celebrates diversity and provides resources aligned with the needs of all residents.



Exhibit: 2023 American Indian and Alaska Native Population by Census Tract

Source: ESRI Living Atlas-2023 ACS 5-Year Estimates, ESRI World Light Gray Canvas –Basemap, City of Arlington-OSI GIS data structure. Current to: March 2025

Asian Population by Census Tract, Arlington 2023

This map highlights the distribution of Arlington's Asian population, based on 2023 ACS 5-Year Estimates. The highest concentrations are found in select census tracts in northern, central, and southeastern Arlington, reflecting strong, established communities that contribute to the City's cultural and economic vibrancy.

As Arlington's Asian population continues to grow, these demographic trends provide valuable insight for enhancing housing accessibility, economic development, and community engagement initiatives. By fostering inclusive policies and resources, the City can ensure that all residents benefit from diverse housing options, business opportunities, and neighborhood investments, reinforcing Arlington's position as a dynamic and welcoming community.



Exhibit: 2023 Asian Population by Census Tract

Source: ESRI Living Atlas-2023 ACS 5-Year Estimates, ESRI World Light Gray Canvas –Basemap, City of Arlington-OSI GIS data structure. Current to: March 2025

Native Hawaiian and Other Pacific Islander Population by Census Tract, Arlington 2023 This map provides insight into the distribution of Arlington's Native Hawaiian and Other Pacific Islander (NHPI) population, based on 2023 ACS 5-Year Estimates. While present throughout the city, higher concentrations are observed in southwestern and central Arlington, reflecting established and growing communities in these areas.

As Arlington continues to diversify and expand, understanding population distribution helps guide targeted investments in housing, community services, and economic opportunities. By leveraging these insights, the City can ensure that resources and infrastructure support the needs of all residents, fostering a thriving and inclusive environment for the NHPI community and beyond.



Exhibit: 2023 Native Hawaiian and Other Pacific Islander Population by Census Tract

Source: ESRI Living Atlas-2023 ACS 5-Year Estimates, ESRI World Light Gray Canvas – Basemap, City of Arlington-OSI GIS data structure. Current to: March 2025

Black or African American Population by Census Tract, Arlington 2023

This map illustrates the distribution of Arlington's Black or African American population, based on 2023 ACS 5-Year Estimates. The highest concentrations are found in southeastern and central Arlington, with a strong presence in neighborhoods along Matlock Road, Eden Road, and Park Row Drive. These areas reflect thriving communities with deep cultural and economic contributions.

As Arlington continues to grow and diversify, this data helps guide targeted investments in housing, economic development, and community resources. Ensuring housing accessibility, business support, and neighborhood enhancements will further strengthen these vibrant communities, promoting long-term stability and opportunity for residents.



Exhibit: 2023 Black or African American Population by Census Tract

Source: ESRI Living Atlas-2023 ACS 5-Year Estimates, ESRI World Light Gray Canvas – Basemap, City of Arlington-OSI GIS data structure. Current to: March 2025

White Population by Census Tract, Arlington 2023

This map highlights the distribution of Arlington's White population, based on 2023 ACS 5-Year Estimates. The population is widely distributed across the city, with higher concentrations in northern, western, and southwestern Arlington. These areas reflect long-established neighborhoods, strong homeownership rates, and stable housing markets.

As Arlington continues to grow and diversify, understanding demographic trends helps inform strategic housing investments, infrastructure planning, and community development initiatives. By leveraging this data, the City can continue fostering inclusive policies that enhance housing accessibility, economic opportunities, and neighborhood vitality for all residents.



Exhibit: 2023 White Population by Census Tract

Source: ESRI Living Atlas-2023 ACS 5-Year Estimates, ESRI World Light Gray Canvas –Basemap, City of Arlington-OSI GIS data structure. Current to: March 2025

Some Other Race Population by Census Tract, Arlington 2023

This map illustrates the distribution of Arlington's residents who identify with a race category not listed separately by the Census, based on 2023 ACS 5-Year Estimates. While present throughout the city, higher concentrations are observed in central and southeastern Arlington, reflecting diverse and growing communities contributing to the City's cultural and economic landscape.

Understanding these demographic patterns allows for targeted community engagement, inclusive housing policies, and investment in infrastructure and services that support Arlington's diverse population. By leveraging this data, the City can continue to enhance neighborhood vitality, expand economic opportunities, and ensure that resources align with the needs of all residents.



Exhibit: 2023 Some Other Race Population by Census Tract

Source: ESRI Living Atlas-2023 ACS 5-Year Estimates, ESRI World Light Gray Canvas – Basemap, City of Arlington-OSI GIS data structure. Current to: March 2025

Two or More Races Population by Census Tract, Arlington 2023

This map highlights the distribution of Arlington residents who identify as two or more races, based on 2023 ACS 5-Year Estimates. The highest concentrations are found in central, southwestern, and southeastern Arlington, reflecting a growing and diverse community.

As Arlington continues to evolve, understanding these demographic trends supports efforts to enhance inclusive housing policies, expand economic opportunities, and strengthen community engagement initiatives. By leveraging this data, the City can ensure equitable access to resources and infrastructure, fostering a thriving, connected, and dynamic environment for all residents.



Exhibit: 2023 Two or More Races Population by Census Tract

Source: ESRI Living Atlas-2023 ACS 5-Year Estimates, ESRI World Light Gray Canvas –Basemap, City of Arlington-OSI GIS data structure. Current to: March 2025

Hispanic or Latino Population by Census Tract, Arlington 2023

This map highlights the geographic distribution of Arlington's Hispanic or Latino population, based on 2023 ACS 5-Year Estimates. The largest concentrations are found in eastern and southern Arlington, reflecting strong, well-established communities, while growing populations are present in other areas across the city.

Arlington's Hispanic and Latino communities play a vital role in the City's economic growth, cultural richness, and housing market trends. Understanding these population patterns supports targeted investments in housing, infrastructure, and community services, ensuring that resources align with residents' needs and future growth opportunities. This data helps inform inclusive development strategies that strengthen Arlington's position as a welcoming and dynamic city for all residents.



Exhibit: 2023 Hispanic or Latino Population by Census Tract

Source: ESRI Living Atlas-2023 ACS 5-Year Estimates, ESRI World Light Gray Canvas – Basemap, City of Arlington-OSI GIS data structure. Current to: March 2025

C. Income and Poverty

Household Incomes

For 2023, over 20% of Arlington households have incomes below \$35,000. The two income categories with the largest shares of population are \$100,000-149,999 and \$50,000-74,999.

Exhibit: 2023 Median Household Incomes by Census Tract



Source: Median Household Incomes by Census Tract, Arlington 2023



Exhibit: 2023 Median Household Incomes by Census Tract

Household Incomes tend to be higher in the southwestern, southeastern, and western parts of Arlington. The lowest household incomes tend to be in the central and eastern parts of the city.

Source: ESRI Living Atlas-2023 ACS 5-Year Estimates, ESRI World Light Gray Canvas – Basemap, City of Arlington-OSI GIS data structure. Current to: March 2025

Poverty Rates, Arlington 2023

Arlington's poverty rate has increased slightly by 0.1% since 2022, but compared to 2020, it has declined by 1.1% overall. The most significant improvement is among children under 18, where the poverty rate has dropped by 3.5% since 2020, marking its lowest level in recent years. Despite these gains, poverty remains concentrated in pockets of central, eastern, and northern Arlington, with an additional high-poverty area in the southeastern part of the city. While the official poverty rate is calculated based on household income relative to federal thresholds, it does not always reflect localized concentrations of need within mixed-income ZIP codes. For example, ZIP code 76013 includes middle-income neighborhoods alongside areas with elevated service needs, such as those surrounding the Arlington Life Shelter. These localized "pockets of poverty" may not be fully captured in citywide statistics but represent critical areas for targeted economic development, workforce training, and housing assistance programs to support low-income households and sustain long-term poverty reduction efforts.



Exhibit: Poverty Rate City Comparison

Source: Arlington Social Economic Profile, 2023, US Census ACS 5- Year Estimates

D. Employment

With low overall unemployment rates, and a broad base of employment sectors, the City has undertaken robust economic development efforts to bring in high-paying jobs while also supporting residents with lower incomes and wealth.

The Bureau of Labor Statistics reports labor force data for the Fort Worth-Arlington area, showing that the unemployment rate in September 2024 was 3.8%.

US Census Data shows that the industries with the highest workforce employment are educational services, and health care and social assistance (19.8%), followed by Retail trade (12.1%), Transportation and warehousing, and utilities (10.2%), and Professional, scientific, and management, and administrative and waste management services (10.2%).

INDUSTRY	% Workforce
Educational services, and health care and social assistance	19.8%
Retail trade	12.1%
Transportation and warehousing, and utilities	10.2%
Professional, scientific, and management, and administrative and waste management services	10.2%
Arts, entertainment, and recreation, and accommodation and food services	9.9%
Manufacturing	9.4%
Finance and insurance, and real estate and rental and leasing	8.0%
Construction	7.5%
Other services, except public administration	4.4%
Wholesale trade	3.2%
Public administration	3.0%
Information	1.9%
Agriculture, forestry, fishing and hunting, and mining	0.60%

Exhibit: Arlington Workforce by Industry (%) US Census ACS 2023

Source: U.S Census Bureau, 2023, ACS

Per the Arlington Economic Development Corporation, and utilizing slightly different categories, the City's industry sectors with the highest number of employees are Education, Entertainment, Finance, Government, Healthcare, Manufacturing, and Retail.

	#
Organization	Employees
Arlington ISD	9,429
General Motors: Assembly & Financial	
Services	8,919
Texas Health Resources	6,619
UT Arlington	5,600
Six Flags Over Texas	3,800
The Parks Mall	3,500
City of Arlington	2,899
Texas Rangers	2,000
J.P. Morgan Chase	1,900

Exhibit: Largest Employers in the City of Arlington

Source: City of Arlington 2022 Economic Development Study

The City's 2022 Economic Development study details the City's plans, which place a heavy emphasis on economic development of the Airport and I-20 area, downtown, and the Entertainment District.

The City works to bring in high-impact wages, including six-figure salary jobs, to develop concentrations of wealth. City leaders are focused on better job creation while taking into account changes in the office market, both in Arlington and across the US generally.

The City has recruited the D.R. Horton and E-Space headquarters over the last few years and would like more headquarters to relocate in Arlington. Economic development plans also call for building on the tremendous research capacity of the University of Texas at Arlington to recruit more research, science, and technology organizations to Arlington.

One challenge that numerous stakeholders recognized was that Entertainment District jobs tend to be service level, stadium jobs with low wages; many are also seasonal jobs. The City's Economic Development team is working to utilize high level Artificial Intelligence (AI) models to identify areas of "precarity" within the city: where people in the community are consistently at risk, as measured by factors such as evictions, access to housing, education, job opportunities, etc. Within these areas, they hope to educate younger adults and potential small business owners on how to use data and technology to build businesses within digital commerce: at Point of Sale, social media, ordering and logistics, and shipping. By strengthening small businesses, the City hopes to help people build wealth to be able to afford housing.

As part of this work, they also hope to connect people who don't feel home ownership is a path for them to resources, information, and guidance in how to make a plan to purchase a home and build wealth. The Economic Development Department would also like to provide grants to small businesses in targeted areas of the city.

E. Workforce Educational and Skill Profile

The city has a diverse and highly skilled workforce, working within a broad array of industries and worker classes. The City has numerous resources for people seeking a four-year degree as well as for professional and technical training without a four-year degree.

Per the City's Economic Development Corporation, with 90+ accredited colleges and universities in the DFW-Arlington metro area, 372,572 students are enrolled, and over 165,000 students graduate from area higher education institutes each year.

In Arlington, 32.9% of the City's population has a Bachelor's Degree or higher, which is slightly above the 32.3% statewide average. Overall, 86.6% of the population has a high school diploma or higher, which exceeds the state average of 85.2%.



Exhibit: Citywide Education Attainment

Source: U.S Census Bureau, 2023, ACS 1-Year Estimates

In addition to four-year degree institutions, Arlington's Dan Dipert Career and Technical Center and Agriculture Science Center, part of the public school system, and Tarrant County College, help prepare people for various careers in everything from Agriculture, Food, and Natural Resources to Transportation, Distribution, and Logistics.

In Fall 2022, the Dan Dipert Career and Technical Center and Agriculture Science Center had 3,303 students enrolled on its eight campuses, including 223 students who identify as Black or African American, 9 American Indian or Alaska Native, 173 Asian, 259 White, and 707 students who report Hispanic/Latino ethnicity (nearly half of students did not provide their race/ethnicity info). Two hundred thirty-four students were enrolled in Special Education programs.

Educational Attainment – Bachelor's Degree or Higher by Census Tract

The highest shares of residents with a Bachelor's Degree or higher are in the northern and western edges of the City, with additional areas in central and southwestern Arlington.



Exhibit: 2023 Educational Attainment by Census Tract

Source: U.S Census Bureau, 2023, ACS 1-Year Estimates

Educational Attainment – Less than a High School Diploma by Census Tract

The highest shares of residents with less than a high school diploma are in eastern and central Arlington.



Exhibit: 2023 Educational Attainment – Less than a High School Diploma by Census Tract

Source: U.S Census Bureau, 2023, ACS 1-Year Estimates

By Class of Worker

Nearly 36% of people employed in Arlington work in the Management, business, science, and arts occupations. The next largest group, those in Sales and office occupations, represent 21.76% of the working population.

Class of Worker	%
Management, business, science, and arts occupations	35.81
Sales and office occupations	21.76
Production, transportation, and material moving	
occupations	17.64
Service occupations	15.38
Natural resources, construction, and maintenance	
occupations	9.43

Exhibit: 2023 Educational Attainment -	- Less than a High School	Diploma by Census Tract
	Ecos than a mon sensor	

Source: U.S Census Bureau, 2023, ACS 1-Year Estimates

III. Housing Market Profile

The Arlington housing market is costly, particularly for lower- and middle-income households. For example, since 2009, the share of Arlington homes in the \$100,000-149,999 price range has declined from 37.3% of the market to only 8.8% of the market. At the same time, the share of homes in the \$300,000-499,999 price range has increased nearly 8 times.

Nonetheless, Arlington is cost-competitive with communities in the surrounding area. Arlington has a varied housing supply, with single-family homes being the predominant owner-occupied housing.

By sub-area, western Arlington, with the largest geographical share of single-family housing, has seen its share decline since 1990. Similarly, while northern Arlington continues to lead the City in shares of renter-occupied housing, those shares have also declined.

By Census Tract, the highest rates of homeownership tend to be in the southern and northern parts of the City. The highest shares of renter-occupied housing are found in the northeastern, eastern, and central parts of Arlington.

Since 2009, the share of Arlington homes in the \$100,000-149,999 price range has declined from 37.3% of the market to only 8.8% of the market. At the same time, the share of homes in the \$300,000-499,999 price range has increased nearly 8 times.

Similarly, rents have rapidly increased. Today, 80% of Arlington rents are over \$1,000 per month.

Nearly 46% of Arlington households spend more than 35% of their monthly income on housing costs. Arlington's median rent of \$1,297 per month is competitive with other cities in Tarrant County and is below the county's \$1,352 median gross rent.

By census tract, the highest median home values are located in the northern and central-west parts of Arlington. The highest rents tend to be in the southern and western areas of the City.

As previously stated, like housing markets across the nation, Arlington's housing market is challenging for lower-income and middle-income families. However, Arlington still remains relatively cost-effective compared to other surrounding cities and the county overall, in both mortgage and rental costs.

Nonetheless, with relatively high mortgage interest rates and increasing home insurance costs, renting can be more cost-effective. In the Dallas-Fort Worth-Arlington area, like the other top 50 US metro markets, it is now considered less expensive to rent.

Exhibit: Housing Occupancy by Census Tract



Source: Arlington Social Economic Profile

Home Values Changes Over Time

Since 2009, the City's housing market has undergone significant changes, with home prices and rental costs rising alongside increasing demand. While affordability challenges have emerged, these shifts reflect a growing and dynamic market. The availability of homes priced between \$100,000 and \$149,999 has declined from 37.3% of the market in 2009 to 8.8% today, while the share of homes in the \$300,000-\$499,999 range has expanded nearly eightfold, establishing mid-range housing as the new standard for buyers.



Exhibit: Percentage of Home Values by Category – Arlington Trends 2009-2022

Source: US Census Bureau, 2023, ACS 5- year estimates

Median Home Values by Census Tract

Arlington's housing market offers a diverse range of home values, creating opportunities for buyers at various price points. The highest median home values are concentrated in the northern and central-western areas, reflecting neighborhoods with larger homes, strong market demand, and established amenities. While home values in Arlington remain more affordable than those in neighboring cities to the north and south, the city continues to be a competitive and attractive option for buyers seeking both value and accessibility within the region.

This relative affordability provides entry points for homeownership, supporting both move-up buyers and long-term residents. As home prices continue to appreciate, ensuring a balanced supply of housing options, including entry-level homes, workforce housing, and diverse financing solutions, will help sustain a vibrant and inclusive housing market that meets the needs of current and future residents.



Exhibit: Median Home Value for Owner-Occupied Housing Units by Census Tract

Source: ESRI Living Atlas-2023 ACS 5-Year Estimates, ESRI World Light Gray Canvas –Basemap, City of Arlington-OSI GIS data structure. Current to: March 2025

Median Contract Rent by Census Tract

The highest median contract rents in Arlington are concentrated in the southern and western parts of the city, where newer developments and higher-demand rental markets drive up costs. As rents continue to rise citywide, these areas reflect premium rental pricing. These neighborhoods tend to attract professionals and higher-income renters, contributing to increased competition for available units. Additionally, the limited supply of lower-cost rental housing in these areas may push cost-burdened renters toward older housing stock in other parts of the city. Expanding affordable rental options will be key to maintaining housing accessibility in these high-cost areas. Encouraging mixed-income developments and leveraging incentives for affordable housing construction may help balance the market, ensuring that residents at all income levels have access to stable and affordable rental options.



Exhibit: 2023 Median Monthly Rent for Single and Multi-Family Properties by Census

Source: ESRI World Light Gray Canvas Basemap City of Arlington – OSI GIS data structure. Current to December 2024

Arlington Home Costs vs Neighboring Communities

Arlington remains one of the more affordable housing markets in the region, with the secondlowest median home value among nine comparable cities. Home values in Arlington are lower than county averages and more aligned with Texas state averages, making it a cost-effective option for homebuyers compared to other cities in the area. While affordability remains a challenge, Arlington's relative housing cost advantage provides opportunities for residents looking to purchase a home at a more attainable price point within the metro region.



Exhibit: Median Value of Owner-Occupied Housing Units (2018-2022)

Source: US Census Bureau, 2023, ACS 5-year estimates

Arlington Rental Costs vs Neighboring Communities

Arlington remains one of the more affordable rental markets in the region, with lower median rental costs compared to many surrounding cities. While rents have risen significantly in recent years, Arlington continues to offer competitive pricing for renters, making it an attractive option for those seeking affordability within the metro area.

However, rising demand and shrinking affordability mean that many renters are still costburdened, with nearly 46% spending more than 35% of their income on rent. To maintain Arlington's rental affordability advantage, continued investment in affordable housing development, rental assistance programs, and policies that encourage diverse housing options will be essential.



Exhibit: Median Gross Rent (2018-2022)

Source: US Census Bureau, 2023, ACS 5-year estimates

A. Housing Condition -- Concerns about Aging Housing Stock

Like many mature cities, Arlington has older housing stock; nearly 2/3 was built before 1980. The oldest single-family housing tends to be in the eastern and central parts of Arlington.

YEAR STRUCTURE	2018-
BUILT	2022
Total housing units	147,492
Built 2020 or later	0.5%
Built 2010 to 2019	5.0%
Built 2000 to 2009	13.0%
Built 1990 to 1999	15.8%
Built 1980 to 1989	28.0%
Built 1970 to 1979	20.5%
Built 1960 to 1969	8.8%
Built 1950 to 1959	6.8%
Built 1940 to 1949	0.9%
Built 1939 or earlier	0.7%

Exhibit: Age of Arlington Housing Stock by Year Built

Source: ACS 5-year estimates for Arlington; COA Single-Family Housing Profile 2024

The eastern part of the City has older, smaller units, and the southeast section has single family homes built in the 1990s that weren't very well built and are deteriorating rapidly. Some of these neighborhoods are all rentals, but the housing stock is not owned by one landlord.

HUD utilizes the following definitions of Housing Problems and Severe Housing problems. HOUSING PROBLEMS

- housing unit lacks complete kitchen facilities;
- housing unit lacks complete plumbing facilities;
- household is overcrowded; and
- household is cost burdened

SEVERE HOUSING PROBLEMS:

- kitchen or plumbing problems above AND
- Severely overcrowded OR
- housing cost burden >50%

Older homes can lead to more housing problems. Per Comprehensive Housing Affordability Strategy (CHAS) data, nearly 53% of renters and 22% of owners report at least one housing problem, which can include problems related to kitchens, plumbing, overcrowding, or cost burdens. In terms of severe housing problems, 29.7% of Renters and 11.2% of Owners have at

least 1 severe housing problem.

Cost Burden is certainly a factor in housing problems, as 47.6% of Renters and 18.5% of Owners are paying more than 30% of their monthly income for housing payments. Please note: this data may include students if they were counted within the 2020 Census.

For people with incomes of \$31,200 or less, more than 86% have severe housing problems in some census tracts, which, in addition to the housing problems previously discussed, can include severe overcrowding or spending 50% or more of monthly incomes on housing costs. The map below, of the larger region with Arlington in the center, shows that large swaths of the Metroplex in which people with extremely low incomes live have very high shares of severe housing problems.



Exhibit: 2024 Severe Housing Needs by Census Tract

Source: **U.S. Department of Housing and Urban Development (HUD).** (2024). *CPD Maps: Community Planning and Development Mapping Tool*. Retrieved from <u>https://egis.hud.gov/cpdmaps/</u>

Arlington offers various programs to support the repair and rehabilitation of housing, including through the Arlington Housing Authority and through the Office of Strategic Initiatives.³ In 2023, the City rehabbed 24 houses. The City would also like to rehab entire neighborhoods as part of a redevelopment strategy.⁴

³ https://www.arlingtontx.gov/City-Services/Housing/Housing-Directory/Housing-Rehabilitation https://www.arlingtontx.gov/City-Services/Your-Home-Neighborhood/Home-Improvement/Arlington-Home-Improvement-Incentive-Program

⁴ https://www.arlingtontx.gov/Government/Departments/Department-Directory/Grants-Management/Neighborhood-Revitalization-Strategy-Area

IV. Fair Housing

A. Public Outreach -- Fair Housing Survey Findings

As part of Arlington's Consolidated Planning efforts, a community survey asked detailed questions about residents' experiences with Fair Housing concerns, as well as their knowledge of Fair Housing laws and resources.

Respondent Profile

Within the community survey, 129 homeowners, 97 renters, 7 people staying with friends, and family, and others shared their insights regarding Fair Housing Issues.



Respondents represent a broad spectrum of the City's incomes. Fifty four percent of respondents reported household incomes of under \$75,000.

Respondents' Household Income	%
\$0-9,999	9.5
\$10,000-14,999	7.7
\$15,000-24,999	7.7
\$25,000-34,999	9.5
\$35,000-49,999	5.9
\$50,000-74,999	13.6
\$75,000-99,999	10.5
\$100,000-199,999	22.7
\$200,000+	12.7



Respondents represent a broad spectrum of the City's housing costs. Homeowners tend to have higher shares of monthly housing payments over \$1,500.
Experiences with Discrimination

Respondents were asked a series of questions related to their experiences (or in some cases, to the experiences of people they know) with various aspects of potential housing discrimination – in real estate practices, banking, insurance, and other areas.

Overall, most respondents had not experienced or known directly of instances of discrimination, but a sizable share of people had experienced discrimination or believed that they had but weren't sure.

The top areas in which people were more likely to have experienced/personally known of others' discrimination were those of high insurance costs and of predatory lending practices.

We also look at respondents' experiences by race. While recognizing that sample sizes are not large enough to make definitive conclusions, they give us a directional sense of what respondents might be experiencing. That is, Total Respondents by Race, including those who did not experience any of these conditions: American Indian or Alaska Native 7; Asian 4; Black or African American 42; Native Hawaiian or Other Pacific Islander 1; White 110; Two or More Races 12.

Each chart below shows the number of people who answered in the following categories:

- YES
- NO
- I think so, but not sure
- Do Not Know

We also include sample comments that respondents included within their remarks.

Experiences With Housing Discrimination Generally

To the question, "Have you ever experienced Housing Discrimination," 6 homeowners and 14 renters said yes, while 7 homeowners and 7 renters thought they had but they weren't sure.



In terms of by race and ethnicity, the charts below show the number of respondents who answered "Yes" or "I think so, but not sure."

Asian respondents report the highest rates of Housing Discrimination; however, their sample size was 4 respondents. Over 1/4th of Black or African American respondents report experiencing housing discrimination.



Over 1/4th of Hispanic or Latino respondents report experiencing housing discrimination.



In their comments, several people noted that they felt discriminated against because their housing payments had increased, including people who had housing choice vouchers. In an interview, the Arlington Fair Housing Officer reported that many of the complaints she received were related to rent increases, but that, for the most part, they were not related to discrimination.

For example, two survey respondents noted:

"I feel like I don't get the help I need being Arab as someone being on disability and my only source of income being from SSI with inflation the cost of living is high and rent keeps increasing but the section 8 payment barely changes I feel like it's because of discrimination."

"HOUSING HAS WENT UP ON MY RENT AFTER I SHARED WITH THEM THAT I'M NOT ABLE TO PAY THE AMOUNT. SO NOW IM BEHIND ON MY RENT."

Another, a senior, noted the increases in rent and other fees.

"Living in an apartment for 7 years and an increase of \$200/mo for a 55+ living facility...71 years old...rec ONE CHECK MONTHLY and paying \$1301/per month that is definitely discrimination... Increasing rent of \$200 how are we supposed to afford a nice place to live with rent this high."

One respondent felt that their situation was related to the number of children they had, as well as financial incentives on the part of the landlord.

"I was living at **example**. my tenant put me out. I could say I do to me believing that I had multiple children and she just wanted to hire amount of rent which she could easily get it by putting me out and requesting another deposit."

Another felt that there might be discrimination in terms of people receiving mortgage loans.

"I don't believe minorities are given the same opportunities as Caucasian counterparts. I've witnessed those with credit score and income lower than minorities get approved for home loans, but minorities were denied."

Experience in Being Denied Opportunity to Rent or Buy in Particular Neighborhoods

In terms of the question "Have you or someone you know been denied the opportunity of buying or renting in a particular neighborhood in Arlington?" 11 renters and 8 homeowners believed this to be true. Another 4 renters and 2 owners responded, "I think so, but not sure."



In terms of by race and ethnicity, the charts below show the number of respondents who answered "Yes" or "I think so, but not sure."

By race, American Indian or Alaska Native and Black or African American respondents report the highest rates of being denied the opportunity to buy or rent in a particular neighborhood.



Nearly ¼ of Hispanic/Latino respondents report having experienced this situation.



Knowledge of Real Estate Steering Practices

In response to the question, "Are you aware of Real Estate (RE) practices that limit Fair Housing (FH) Choices (such as steering people to particular neighborhoods, or falsely claiming no housing is available?) 12 renters and 14 homeowners responded yes, while 6 renters and 3 homeowners responded, "I think so, but no sure."



By race, Asian and Black or African American respondents report the highest rates of awareness of real estate Steering practices.



Higher shares of respondents who are not Hispanic/Latino report awareness of Steering.



Regarding Real Estate practice, survey respondents commented that gentrification and singlefamily zoning have made it difficult to develop low-income housing throughout the city.

One person suggested that "too many apartments using space for single family homes and/or commercial."

Another respondent noted that apartment fees are excessive. "Apartment rentals owned by corporations are gouging and profiteering on application fees as well as 'bait and switching' once people are approved. Their systems are more corrupt than the HOA's are."

Experience with/Knowledge of Discriminatory Practices in Banking

In terms of bank lending practices, to the question "Have you or someone you know experienced "predatory" lending practices in trying to get a mortgage (such as higher interest rates, excessive fees; unfair, deceptive or fraudulent loan practices)?", 11 renters and 11 homeowners responded yes, while 4 renters and 6 homeowners responded, "I think so, but not sure."



By race, Asian and Black or African American respondents report the highest rates of experience with predatory lending practices.



Higher shares of Hispanic/Latino respondents report experience with predatory lending practices.



Awareness of Racial/Ethnic Minorities Challenges in Securing Mortgage Loan

In response to the question, "Are you aware of problems faced by some groups (e.g., racial/ethnic minorities) in securing a mortgage loan?", 26 renters and 35 homeowners said yes, while 3 renters and 7 homeowners responded, "I think so, but not sure." This was the highest level of agreement of all the questions.





By race, Black or African American, White, and American Indian or Alaska Native respondents report the highest rates of awareness regarding some racial/ethnic minority groups' difficulties in securing a mortgage loan.

Nearly 46% of Hispanic/Latino respondents report awareness of these challenges in securing mortgage loans.



Fair Housing and Home Insurance

In response to the question, "Have you or someone you know been refused, discouraged from, or charged more for home insurance?", 10 renters and 18 homeowners responded yes, while 4 renters and 4 homeowners responded, "I think so, but not sure."



By race, one of one Native Hawaiian or Other Pacific Islander respondents responded Yes, giving the group a 100% score. Additionally, Asian, White, and Black or African American respondents had the highest rates of being or knowing someone who has been refused, discouraged from, or charged more for home insurance.



Over 1 in 5 of Hispanic/Latino respondents report this situation.



Survey Respondent Comments

In their comments regarding banking, lending, and insurance, several respondents noted that their credit was a problem; as one person stated, "lower credit score, higher rate." Another stated, "For homeowners or renters' insurance, costs are extremely high for those with low credit scores, perpetuating the Cycle of low dti."

One respondent felt that they had been deceived into purchasing an Adjustable-Rate Mortgage, or ARM. "When we purchased our home in Arlington, we were put on an ARM loan and didn't know the consequences or the terms of an ARM. We had good credit and funds for a down payment. We later found out that the ARM loan and the exorbitant interest rate was beneficial to the loan officer. Consequently, it put a lot of unnecessary financial strain on our family and took years to recover from these deceptive practices."

Another stated, "Minorities are taken advantage of by owner financed homes."

Several respondents felt that homeowner insurances were increasing too rapidly, especially for older houses or houses in higher crime areas. While it is unclear to what they were referring, one person commented, "I see this a lot in the ethnic communities with trusted agents of the same community."

One person noted that their homeowner's insurance costs had doubled, as did another "Este año Allste me subió el doble que el año anterior. \$2000. A \$4000 (This year Allstate raised me twice as much as the previous year. \$2000. At \$4000.)

One person suggested that some insurance companies do not pay out claims, stating "there are some companies that do not pay out justifiable claims without legal action. I am aware of 4 claims that have not been paid until the company was sued. Switching to another insurance company would be near impossible due to the number of claims within the metro area including Arlington."

AWARENESS AND LIKELY RESPONSE TO FAIR HOUSING SITUATIONS

Awareness of Fair Housing Laws

In response to the question, "Are you aware of Fair Housing Laws?", 41 renters and 77 homeowners said yes. While 14 renters and 9 homeowners responded, "I think so, but not sure," another 19 renters and 11 homeowners indicated they were not aware.



By race, one of one Native Hawaiian or Other Pacific Islander respondents responded Yes, giving the group a 100% score. Majorities of all other racial groups are aware of Fair Housing Laws, although 50% of Asian respondents report awareness.



Nearly twice as many Non-Hispanic or Latino respondents are aware of Fair Housing Laws as Hispanic/Latino respondents, perhaps due to language barriers.



Reporting Housing Discrimination

In response to the question, "If you encountered housing discrimination, would you report it?", only 9 renters and 3 homeowners indicated that they would not.





By race, one of one Native Hawaiian or Other Pacific Islander respondents responded Yes, giving the group a 100% score. Except for Asian respondents, large majorities of all other racial groups would report housing discrimination.

Respondents of Hispanic/Latino background would report housing discrimination at a higher rate than respondents who are not Hispanic/Latino ethnicity.



Knowledge of How to Report Housing Discrimination

In response to the question, "Do you know how to report housing discrimination in Arlington? (You can contact HUD at 800-669-9777), 20 renters and 28 homeowners did not know, while 10 renters and 7 homeowners responded "I think so, but not sure."



By race, one of one Native Hawaiian or Other Pacific Islander respondents responded Yes, giving the group a 100% score. Asian respondents were unsure how to report housing discrimination, but majorities of the other racial groups knew how to do so.



Over half of Hispanic/Latino respondents and non-Hispanic/Latino respondents know how to report housing discrimination.



In their comments, several people appreciated receiving this information through the survey and stated "I do now!" Additional comments included, "I will be calling the phone number posted. Because of the apartment I live in," and "Ya lo sé ahora mismo con esta encuesta" (I already know it right now with this survey.)

One person spoke of the need for affordable housing, stating, "the most important thing we can do for fair housing is allow builders to construct dense housing, so people can live in it affordably."

Another person commented, "Now that I'm 71 and retired and single how are we supposed to live...not drive a spots car but at least have a nice safe place to live...I watched my mom being single after our Dad passed for 20 years barely making it...I'm on Section 8 and I thank God for the assistance but the nice apartments do not accept Housing Assistance....WHY...are they afraid of the types of people that will be moving into their units...they discriminate anyway so what would be the difference. I'm so blessed for the assistance and I wouldn't do anything for this to be taken from me...I would like better choices. a nicer place to enjoy my final days here to enjoy my grand kids...the question is. WHY IS IT SO HARD ON THE ELDERLY ? We worked all of our lives why not make it easy for us to enjoy the few years we have left. tears are in my eyes while I'm taking the time to share my thoughts...it's NOT FAIR. ITS NOT FAIR"

B. City of Arlington's Current Fair Housing Legal Status/Fair Housing Activities and Resource

City of Arlington Legal Status: Consent Decree

The City's three-year consent decree regarding the placement of tax credits will expire in February 2025.

City of Arlington Fair Housing Information, Resources, and Education

Within Arlington and northern Texas, the following entities provide support and information to citizens regarding Fair Housing Issues.

City of Arlington Fair Housing Officer

- Provides resources and referrals to HUD, Legal Aid, and City agencies
- City Website provides Fair Housing Education/Resources & Homebuyer Assistance
 Programs

US Dept of Housing and Urban Development

• Receives complaints, investigates some complaints and refers most to Texas Workforce Commission's Civil Rights Division

Texas Workforce Commission's Civil Rights Division

 Investigates and closes cases with HUD reviewing to ensure adherence to administrative processing procedures

North Texas Fair Housing Center

- Conducts testing of housing discrimination US Consumer Finance Protection Bureau
- Collects and analyzes home mortgage application activity (HMDA data)

City of Arlington Fair Housing Complaints

The City's Fair Housing Office has received approximately 25 Fair Housing complaints over the last three years. The Fair Housing Officer provides those callers with resources, including those on the City's Fair Housing web page⁵, and referrals to HUD and Legal Aid.

The City's Fair Housing Officer noted that her office does receive complaints, but that nearly all of them were not issues related to fair housing protected classes. Rather, most of the calls she received related to landlords not renewing leases, or landlords raising rents. The Fair Housing Officer felt the City's laws and regulations were good overall in supporting Fair Housing Choice.

⁵ https://www.arlingtontx.gov/Government/Departments/Department-Directory/Grants-Management/Fair-Housing-Compliance

In addition to complaints about rental contracts, other cases brought to the City's Fair Housing Officer included a man who'd been evicted through the court system and who wanted more time to move his things out. In another case, a woman who'd rented a room in a complex traditionally offered for university students found that she was being charged for services that pertained more specifically to students (e.g., calling for maintenance, not going to classes.) The Fair Housing Officer helped the tenant to understand the terms of her lease were more focused on student situations, and the tenant agreed that it probably made sense to move to a more traditional rental complex. The Officer also felt that if the student complex was offering lodging to non-students, a separate version of the lease might be a good idea.

One other situation involved a household for whom a landlord had constructed a ramp for a family member's wheelchair access; the tenant felt the ramp was too steep and narrow and perhaps not up to Code. The Fair Housing Officer referred the family to the City's Code Compliance unit to follow up.

One case that she heard of (but was not involved in) concerned a group of immigrants from Afghanistan who were "brushed off" when they tried to rent at a South Arlington complex. The group met with the Texas Department of Housing and Community Affairs to pursue further action.

While the Fair Housing Officer felt it was possible that people were being discriminated against in Fair Housing Choice, she did not have any evidence to support this, as she felt some landlords may be more skilled in covering up such actions.

The Fair Housing Officer felt that the biggest challenges to fair housing were the limited choices available to people with lower incomes. Most of the people who call the Arlington office do not have housing choice vouchers, but she noted that the Small Area Fair Market Rents (SAFMR), categorized by zip code, didn't pay enough in the more expensive parts of town.

On the other hand, she noted that some landlords advertise on real estate industry social media that they will take vouchers and are motivated by what they see as guaranteed income from the government. Some of these landlords will not advertise their rents, but when asked about the rent, will in turn ask what size voucher the person holds. They will then ask for the maximum of the voucher.

In all, the Fair Housing Officer felt that more education about what kind of rental contracts people are signing might mitigate some of the problems people have about rents increasing or contracts not being renewed. She felt that management companies should explain tenants' responsibilities and their rights when they sign their contracts.

Arlington's Fair Housing Education/Resources & Homebuyer Assistance Programs

The City of Arlington website offers a comprehensive set of resources for people seeking to understand or address Fair Housing Issues.⁶

The resources include information regarding What is Prohibited in terms of:

- The Sale and Rental of Housing
- In Mortgage Lending
- In Addition (including prohibiting threats, coercion, intimidation, interference with people exercising their fair housing rights; and advertising or statements indicating a limitation or preference based on any of the seven protected classes.)

A separate section provides information related to Disability and Discrimination, including information related to:

- Do You Have a Disability
- Housing Opportunities for Families
- What is NOT Discrimination
- If you Think Your Rights have been Violated

Finally, the website includes contact information for additional assistance and information about Fair Housing agencies, and an LGBTQ Guide to Fair Housing. Phone numbers, email addresses, and information about how to report a complaint are also provided, including assistance for people with disabilities. The City's website allows for translation into Chinese (simplified), Filipino, French, German, Hindi, Italian, Korean, Spanish, and Vietnamese. Additionally, the website is designed to meet Accessibility Design Standards of the Americans with Disabilities Act (ADA).

The City's Homebuyer Assistance Programs offer downpayment assistance and the City's Home Rehabilitation Program offers Housing Rehabilitation, Architectural Barrier Removal, and Emergency Repairs.

The Arlington Homebuyer's Assistance Program (AHAP) offers downpayment and closing cost assistance in the form of a forgivable loan of up to \$20,000 based on each applicant's underwriting and subsidy layering assessment. The loan is 0% interest and is payable only if you sell, refinance with cash-out, or lease your home during the affordability period which is typically ten years. AHAP provides both pre-purchase and post-purchase counseling for clients using the program and remains a resource for clients who may face challenges during their tenure as homeowners.

⁶ https://www.arlingtontx.gov/Government/Departments/Department-Directory/Grants-Management/Fair-Housing-Compliance 59

C. Potential Impediment to Fair Housing – Need for Additional Fair Housing Education

Arlington offers a variety of tools for people within 10 different language groups to access in learning about and acting on Fair Housing concerns.

However, within the Community Survey, only 42.4% of Hispanic/Latino respondents were aware of Fair Housing Laws, perhaps due to language barriers or a lack of awareness of the City's resources. Within the survey, 93.3% of Hispanic/Latino respondents would report housing discrimination if they encountered it, the highest share of all groups (except for the 100% score for one Native Hawaiian or Other Pacific Islander respondent). Asian respondents were unsure how to report housing discrimination.

While the existing resources are robust and helpful, Arlington may need to take additional steps to raise awareness of Fair Housing and Fair Housing resources, particularly within communities in which English is not the main language spoken. This information and education may also extend to credit counseling and a more thorough understanding of the mortgage application process.

With Debt/Income Ratio being the top reason for declined mortgage applications for all groups, followed by Credit History, potential buyers might benefit from understanding how to prepare or fix their financial/credit profiles before applying for a mortgage. Additional credit counseling information or referrals to credit counseling agencies might also be helpful for people within any language group.

Recommendation

The City's website, with its multiple language options, is a great source of information for people of many backgrounds. Because some groups, particularly non-English speakers and immigrant groups, might not be as aware of these resources, the City might consider expanding Fair Housing Education information -- via brochures or posters or social media, for example -- for residents in other languages, particularly in Arlington's immigrant communities. Arlington might work with local nonprofits serving individuals in those communities to distribute information or offer Fair Housing or Homebuying workshops among community residents.

D. Fair Housing Complaints/Enforcement

The study team interviewed and received data regarding local and statewide Fair Housing cases/actions from the HUD Regional Office in Fort Worth and the Civil Rights Division of the Texas Workforce Commission.

The team reviewed for any trends or patterns within the data, including the resolution of cases. As the HUD investigatory arm for most Fair Housing cases, the Civil Rights Division of the Texas Workforce Commission receives housing discrimination complaints from individuals and from HUD complaints. These cases are investigated and the Civil Rights Division attempts to resolve the dispute and close the case. HUD reviews the closed cases to ensure the Civil Rights Division is following their administrative processing procedures.

E. Fair Housing Cases Investigated and Closed, 2019-2024

From September 1, 2019 through August 31, 2024, HUD received 37 complaints regarding fair housing discrimination. Of that number, 4 cases were withdrawn by the Complainant without resolution, and 33 cases were forwarded to the TWC Civil Rights Division for investigation.

Over half of the cases were related to a person's disability, while another 27% included race as a basis for the complaint.

Texas Workforce Commission – Civil Rights	Division
Disability	15
Disability, Retaliation	2
Familial Status	1
National Origin	1
National Origin, Disability,	
Retaliation	1
Race	5
Race, Color	1
Race, Disability	1
Race, Disability, Retaliation	1
Race, Sex	1
Retaliation	2
Sex, Retaliation	2
TOTAL	33

Basis of Complaint

Closed Cases: September 1, 2019- August 31, 2024

Resolution of Cases

Within the 33 Arlington cases, six were settled successfully, and 18 were not found to have cause. One complaint was withdrawn by the complainant after a resolution, another was withdrawn by the complainant without a resolution, and in one case the complainant failed to cooperate. (One additional case does not have information on its resolution.)

The six Arlington cases that were settled were related to disability and disability with retaliation.

	Complainant failed to cooperate	Complaint withdrawn by complainant after resolution	Complaint withdrawn by complainant without resolution	Conciliation/ settlement successful	No cause determination	(blank)	Grand Total
Disability	1		1	5	8		15
Disability, Retaliation				1	1		2
Familial Status	1						1
National Origin					1		1
National Origin, Disability, Retaliation					1		1
Race			2		2	1	5
Race, Color					1		1
Race, Disability					1		1
Race, Disability, Retaliation	1						1
Race, Sex					1		1
Retaliation		1			1		2
Sex, Retaliation	1				1		2
Grand Total	4	1	3	6	18	1	33

Brief descriptions provided by the TWC Civil Rights Division note the following circumstances of the cases settled successfully. Most were related to failures to make reasonable accommodations or to permit reasonable modifications. Additionally, acts of coercion and discrimination in terms relating to rental were also cited.

- Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
- Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts
- Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
- Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
- Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification; Failure to make reasonable accommodation
- Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation

F. Fair Housing Testing

Despite numerous phone calls and emails to the North Texas Fair Housing Center, including a planned meeting, staff members did not respond to our requests for information regarding Fair Housing Testing. A Fair Housing official at the Texas Department of Housing and Community Affairs suggested that it was likely that no Fair Housing Testing was occurring in Arlington through the North Texas Fair Housing Center or any other organization.

G. Fair Lending: Home Mortgage Disclosure Act (HMDA) Analysis

The ability to enjoy the benefits and comforts of home ownership are dependent on financial resources to purchase a home. The ability to obtain a loan from a bank or other financial institution is therefore foundational to home ownership. Per the Federal Reserve, in September 2024, the total market value of owner-occupied real estate owned by individuals in the United States was approximately \$48 trillion.⁸

Discriminatory lending practices include declining mortgage applications from affected groups or offering particular groups more expensive and less desirable mortgage terms and conditions.

This analysis reviewed home mortgage applications in Arlington in 2023 and calculated decline rates by race, ethnicity, or gender. The applications reviewed met the following criteria:

- a. One- to Four-Family Dwelling
- b. Manufactured Homes
- c. Owner Occupied as Principal Dwelling
- d. Secured by First Lien
- e. Home Purchase
- f. Arlington

Disproportionate Share of Declines

In order to identify whether an ethnic/racial or gender group is considered to have a disproportionately greater number of lending declines, we adapt the HUD definition regarding disproportionate share of housing problems: that is, when the percentage of people in a group being declined exceeds the percentage for all ethnic/racial/gender groups as a whole by ten percentage points.

The data does suggest some areas of potential concern in terms of decline rates among people who identify as "Two or More Minority Races," whose approval rates are 32% lower than the overall averages, as well as Black or African American applicants, whose approval rates were 18% below overall averages. Additionally, Native Hawaiian or Other Pacific Islander applicants were approved at a rate 12% lower than overall averages. However, it's important to note that the sample sizes for individuals identifying as Two or More Races (36) and Native Hawaiian or Other Pacific Islander (19) were quite small, making it difficult to draw definitive conclusions about these groups.

Similarly, as the subsequent analyses will show, Black or African American applicants with incomes of \$201,000-300,000 have lower approval rates than White applicants with incomes of \$51,000-75,000. The relatively small sample of Black or African American applicants in this income category (21) may play some role in the significant disparity.

⁸ https://fred.stlouisfed.org/series/BOGZ1FL155035013Q

Mortgage Approval Rates by Race and Ethnicity

This data analysis looks at Conventional First Lien applicants who have been approved (whether or not they accept the loan) and those who were denied. (Not including incomplete apps, etc.)

Within this subset of applications, overall 79% of applications were approved (loan originated or applicant doesn't accept the loan) and 21% were declined. By race, White applicants had an 82% approval rate, and Asian applicants had an 87% approval rate. The lowest approval rates were for applicants who reported 2 or more minority races.

In terms of a disproportionate share of declines, Black or African American, Native Hawaiian or Other Pacific Islander, and Two or More Races applicants had decline rates greater than 10% above overall averages.

	Approved	Approved				
	and Loan	but Not			Approval	Decline
	Originated	Accepted	Denied	TOTALS	Rate	Rate
American Indian or						
Alaska Native	24	1	10	35	71%	29%
Asian	488	19	74	581	87%	13%
Black or African						
American	262	19	177	458	61%	39%
Native Hawaiian or						
Other Pacific Islander	6		3	9	67%	33%
White	1538	41	350	1929	82%	18%
2 or more minority						
races	7	1	9	17	47%	53%
OVERALL AVERAGES	2325	42	623	2990	79%	21%

By Ethnicity, Not Hispanic or Latino applicants had higher approval rates (81%) than Hispanic or Latino applicants (75%). (Please note: Totals may not match those of Race Totals because some applicants do not answer each question.)

	Approved and Loan	Approved but Not	Denied	TOTALS	Approval Rate	Decline Rate
	Originated	Accepted				
Hispanic or Latino	595	22	210	35	75%	25%
Not Hispanic or Latino	1,766	62	433	2,261	81%	19%
OVERALL AVERAGES	2,361	84	64	3,088	79%	21%

Mortgage Approval Rates by Income by Race

By Income and Race, Asian or White applicants generally have higher approval rates at most income categories. Two or More Races, American Indian or Alaska Native, and Native Hawaiian or Other Pacific Islander populations by income have very small sample sizes and are therefore more difficult to make assertions regarding; for example, some categories have 100% approval rates but have few applicants within that category.

Some disproportionate shares of declines seem apparent when comparing approval rates of Black or African American applicants with incomes of \$201,000-300,000 (21 approvals with a 70% approval rate) with those of White Applicants with incomes of \$51,000-75,000 (321 approvals with an 81% approval rate). As previously stated, perhaps with a larger sample size of Black or African Americans in the \$201-300,000 income category, these differences would not be so large.

	\$1	\$11	\$26	\$51	\$76	\$101	\$151	\$201	\$301	\$401	
APPROVAL	thru	thru	thru	thru	thru	thru	thru	thru	thru	thru	
RATES BY	\$10K	\$25K	\$50K	\$75K	\$100K	\$150K	\$200K	\$300K	\$400K	\$500K	\$500K+
RACE/INCOME											
American Indian											
or Alaska Native	N/A	0%	43%	100%	56%	86%	100%	100%	N/A	N/A	N/A
Asian	N/A	67%	50%	92%	88%	90%	87%	95%	82%	100%	86%
Black or African											
American	N/A	29%	33%	59%	63%	68%	67%	70%	75%	40%	100%
Native											
Hawaiian or											
Other Pacific	N/A	N/A	N/A	75%	100%	100%	N/A	0%	N/A	N/A	100%
Islander											
White	29%	29%	61%	81%	86%	87%	89%	90%	94%	100%	90%
2 or more											
minority races	N/A	0%	0%	50%	0%	75%	67%	N/A	100%	N/A	N/A
OVERALL											
AVERAGES	29%	30%	54%	79%	83%	84%	85%	88%	88%	90%	90%

Within the \$26,000-50,000 income category, Black or African American applicants are approved at rates over 20% below overall averages. From \$51,000-75,000, and \$76,000-100,000, Black or African American approval rates are 20% below overall averages. Differences between Black or African American and overall averages are more than 10% for \$101,000-150,000, and \$151,000-200,000 income ranges. (Higher income ranges have small sample sizes.)

Source: As with all of the HMDA analyses, the consultant team calculated approval rates, etc. based on 2023 HMDA Data.

Mortgage Approval Rates by Income by Ethnicity

By Income and Ethnicity, non-Hispanic/Latino applicants generally have higher approval rates at most income categories, with the exception of \$1,000-25,000, and \$101,000-150,000, with similar rates at \$76,000-100,000.



A potentially disproportionate share of declines can be seen within the following income categories, in which approval rates for Hispanic or Latino applicants are 10+ points below those for non-Hispanic or Latino applicants.

- \$26,000-50,000
- \$301,000-400,000
- \$401,000-500,000
- \$500,000+

Share of Applications and Declines by Race

Overall, while Black or African American applicants represented 15.3% of applicants, this group represented 28.4% of declines. Both White and Asian applicants have lower shares of declines than their shares of the population.

	% TOTAL APPS	% TOTAL DECLINES
American Indian or Alaska Native	1.2%	1.6%
Asian	19.4%	11.9%
Black or African American	15.3%	28.4%
Native Hawaiian or Other Pacific		
Islander	0.3%	0.5%
White	64.5%	56.2%
2 or more minority races	0.6%	1.4%

Decline Reasons by Race

Debt/Income ratio was the most frequently cited reason for declines for all racial groups.

In second place, Credit history was most frequently cited as a decline reason among all racial groups. <u>Please note:</u> Hx below refers to "History" – Employment History or Credit History.

	Debt/	5			Insuff Cash - - Downpay	Unverif		
American	Income	Emp Hx	Credit Hx	Collateral	(closing)	Info	Incomplete	Other
Indian or		/						
Alaska Native	40.0%	0.0%	30.0%	0.0%	0.0%	10.0%	10.0%	10.0%
Asian	38.7%	2.7%	21.3%	5.3%	6.7%	8.0%	10.7%	6.7%
Black or								
African								
American	30.1%	1.1%	24.4%	6.8%	1.7%	6.3%	15.9%	13.6%
Native								
Hawaiian or								
Other Pacific								
Islander	33.3%	0.0%	33.3%	0.0%	0.0%	0.0%	33.3%	0.0%
White	37.8%	1.1%	20.2%	10.2%	4.0%	3.4%	14.8%	8.5%
2 or more								
minority								
races	33.3%	0.0%	44.4%	0.0%	0.0%	0.0%	22.2%	0.0%
Grand Total	35.7%	1.3%	22.1%	8.3%	3.5%	4.8%	14.7%	9.6%

Share of Applications and Declines by Ethnicity

Overall, Hispanic or Latino applicants represented 27% of applicants, and 33% of declines.

	% TOTAL APPS	% TOTAL DECLINES
Hispanic or Latino	27%	33%
Non-Hispanic or Latino	73%	67%

Decline Reasons by Ethnicity

Debt/Income ratio was the most frequently cited reason for declines for all ethnic groups.

In second place, Credit history was most frequently cited as a decline reason among all ethnic groups.

	Debt/ Income	Emp Hx	Credit Hx	Collateral	Insuff Cash Downpay (closing)	Unverif Info	Incomp	Other
Hispanic or								
Latino	43%	1%	20%	10%	2%	3%	12%	9%
Not Hispanic								
or Latino	33%	1%	23%	8%	3%	6%	15%	11%

Approval Rates by Gender

	Approved & Loan Originated	Approved but Not Accepted	Denied	Totals	Approval Rate	Decline Rate
Female	681	27	255	963	74%	26%
Male	982	42	298	1322	77%	23%
TOTAL	1,663	69	553	2,285	76%	24%

By Gender, male applicants have slightly higher approval rates than female applicants.

Approval Rates by Gender and Income

By Income and Gender, female applicants generally have higher approval rates at the highest income ranges (\$301,000 and up); however, the female sample sizes are 10 or under and therefore not as determinative of true rates. Sample sizes for men and women are also too small in the \$11,000-25,000 group.



Share of Applications and Declines by Gender

Applications by females represent 42% of all apps and 46% of all declines.

	% TOTAL APPS	% TOTAL DECLINES
Female	42%	46%
Male	58%	54%

Decline Reasons by Gender

Debt/Income ratio was the most frequently-cited reason for declines for all applicants.

In second place, Credit history was most frequently-cited as a decline reason among all applicants.

					Insuff			
					Cash			
	Debt/	Emp	Credit		Downpay	Unverif		
	Income	Hx	Hx	Collateral	(closing)	Info	Incomplete	Other
Female	38%	2%	22%	8%	2%	4%	13%	11%
Male	35%	0%	20%	10%	3%	7%	14%	10%
Grand								
Total	34%	1%	22%	9%	4%	6%	14%	10%

Action Taken by Census Tract

Because the data is cut so finely by census tracts, we included all categories of applicant outcomes, including those Withdrawn by the Applicant or Incomplete applications. Looking at the entire universe of applications, in total 58% of applicants were approved (with 56% loans originating and 2% where the applicant did not accept the loan.)

Approval rates ranged from 74% (including approved but not accepted) in tract 11310 and 72% in tract 113109 to 27% in tract 111410 and 23% in tract 121702.

The census tracts with the highest shares of Incomplete Apps were 121702 (23%) and 113117 (21%). Those census tracts for which 33% or more of all applications were withdrawn by the applicant include 111410 (36%), 111552 (38%), 111553 (37%), 113112 (33%), and 121905 (33%),

CENSUS TRACT	Loan Orig	Approved but not accepted	DENIED	Withdrawn by applicant	Incomplete	TOTAL APPS
111315	42%	1%	26%	21%	9%	76
111316	49%	4%	23%	14%	9%	160
111402	64%	1%	16%	15%	3%	91
111407	52%	4%	24%	12%	8%	50
111408	68%	2%	15%	10%	5%	59
111409	64%	1%	12%	17%	7%	130
111410	27%	0%	36%	36%	0%	11
111505	65%	3%	6%	19%	6%	63
111506	48%	2%	17%	22%	11%	64
111513	52%	0%	10%	28%	10%	61
111514	57%	4%	13%	21%	5%	105
	1	1	1	1	1	1
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111516	52%	5%	17%	23%	3%	103
111522	41%	2%	23%	23%	10%	81
111525	61%	2%	8%	21%	8%	61
111526	63%	0%	10%	19%	8%	63
111529	55%	1%	27%	14%	3%	71
111530	63%	1%	15%	19%	3%	96
111531	65%	2%	13%	15%	5%	86
111532	63%	1%	15%	14%	7%	147
111534	66%	2%	9%	21%	2%	108
111540	49%	5%	20%	23%	4%	80
111542	51%	1%	24%	15%	8%	86
111544	55%	2%	17%	20%	6%	126
111545	45%	10%	14%	25%	6%	51
111546	59%	3%	16%	13%	9%	93
111552	43%	4%	14%	38%	3%	80
111553	44%	0%	15%	37%	4%	27
111556	50%	3%	16%	25%	6%	64
111557	74%	0%	3%	13%	10%	31
111558	59%	5%	12%	15%	8%	59
111559	25%	25%	25%	25%	0%	4
111560	55%	5%	17%	17%	6%	138
111561	46%	0%	28%	21%	5%	39
111562	61%	2%	19%	11%	7%	90
111567	51%	2%	25%	12%	11%	65
111568	55%	0%	23%	15%	7%	101
111569	53%	8%	19%	14%	6%	36
111570	55%	3%	13%	19%	10%	31
113005	56%	0%	19%	19%	7%	27
113102	65%	4%	13%	15%	4%	54
113104	38%	6%	25%	31%	0%	16
113107	61%	2%	9%	23%	5%	44
113108	51%	3%	19%	18%	9%	101
113109	72%	0%	13%	13%	3%	39
113110	71%	3%	10%	12%	4%	69
113112	42%	4%	17%	33%	4%	24
113115	41%	2%	37%	12%	8%	51
113116	41%	0%	29%	18%	12%	17
113117	21%	7%	21%	29%	21%	14
113119	56%	4%	22%	7%	11%	27
113120	61%	1%	6%	25%	7%	595

121605	54%	2%	100/	210/		
		∠/0	19%	21%	5%	63
121606	51%	1%	14%	28%	5%	76
121608	66%	1%	12%	19%	1%	89
121609	57%	1%	14%	22%	6%	95
121610	49%	0%	22%	30%	0%	37
121611	43%	5%	22%	24%	6%	79
121612	49%	1%	19%	19%	12%	78
121613	64%	2%	16%	16%	2%	61
121614	50%	8%	25%	8%	8%	12
121615	56%	2%	13%	26%	3%	62
121702	23%	0%	36%	18%	23%	22
121703	41%	0%	19%	32%	8%	37
121704	57%	9%	9%	26%	0%	35
121904	59%	0%	19%	9%	13%	32
121905	33%	0%	0%	33%	33%	3
121906	55%	9%	18%	6%	12%	33
121907	55%	0%	10%	15%	20%	20
122001	52%	7%	10%	24%	7%	29
122002	55%	4%	20%	15%	7%	55
122100	48%	2%	24%	20%	6%	88
122300	44%	8%	20%	20%	8%	25
122402	55%	3%	14%	17%	10%	29
122500	67%	1%	13%	16%	3%	76
122600	57%	0%	11%	27%	5%	63
122701	71%	0%	21%	7%	0%	14
122702	62%	3%	7%	21%	7%	29
122801	50%	8%	17%	17%	8%	12
122802	62%	3%	15%	15%	5%	60
122902	50%	0%	29%	12%	9%	34
Grand Total	56%	2%	16%	19%	6%	5313

Tracts with Fewest Applications

Census Tract 113120 represented 11% of all applications. Nineteen census tracts represented under 30 applications (0.6%) each, perhaps presenting a targeting opportunity for homebuyer education. Three of the tracts, 121905 (33%),113112 (33%) and 111553 (37%) had 1/3 or more of applications withdrawn by applicants.

	TOTAL
Census Tract	APPS
121905	3
111559	4
111410	11
121614	12
122801	12
113117	14
122701	14
113104	16
113116	17
121907	20
121702	22
113112	24
122300	25
111553	27
113005	27
113119	27
122001	29
122402	29
122702	29

Share of Applications and Share of Declines by Census Tract

In three Census Tracts, the share of declines was more than double that of the share of applications (111410, 113115, 121702). By contrast, while Census Tract 113120 represented 11.2% of applications, it represented only 4.5% of declines.

CENSUS	% Total	% Total
TRACT	Apps	Declines
111315	1.4%	2.4%
111316	3.0%	4.4%
111402	1.7%	1.8%
111407	0.9%	1.4%
111408	1.1%	1.1%
111409	2.4%	1.8%
111410	0.2%	0.5%
111505	1.2%	0.5%
111506	1.2%	1.3%
111513	1.1%	0.7%
111514	2.0%	1.7%
111516	1.9%	2.0%
111522	1.5%	2.3%
111525	1.1%	0.6%
111526	1.2%	0.7%
111529	1.3%	2.3%
111530	1.8%	1.7%
111531	1.6%	1.3%
111532	2.8%	2.6%
111534	2.0%	1.2%
111540	1.5%	1.9%
111542	1.6%	2.5%
111544	2.4%	2.5%
111545	1.0%	0.8%
111546	1.8%	1.8%
111552	1.5%	1.3%
111553	0.5%	0.5%
111556	1.2%	1.2%
111557	0.6%	0.1%

111558	1.1%	0.8%
111559	0.1%	0.1%
111560	2.6%	2.9%
111561	0.7%	1.3%
111562	1.7%	2.0%
111567	1.2%	1.9%
111568	1.9%	2.7%
111569	0.7%	0.8%
111570	0.6%	0.5%
113005	0.5%	0.6%
113102	1.0%	0.8%
113104	0.3%	0.5%
113107	0.8%	0.5%
113108	1.9%	2.3%
113109	0.7%	0.6%
113110	1.3%	0.8%
113112	0.5%	0.5%
113115	1.0%	2.3%
113116	0.3%	0.6%
113117	0.3%	0.4%
113119	0.5%	0.7%
113120	11.2%	4.5%
121605	1.2%	1.4%
121606	1.4%	1.3%
121608	1.7%	1.3%
121609	1.8%	1.5%
121610	0.7%	1.0%
121611	1.5%	2.0%
121612	1.5%	1.8%
121613	1.1%	1.2%
121614	0.2%	0.4%
121615	1.2%	1.0%
121702	0.4%	1.0%
121703	0.7%	0.8%
121704	0.7%	0.4%
121904	0.6%	0.7%
121905	0.1%	0.0%
121906	0.6%	0.7%
121907	0.4%	0.2%

122001	0.5%	0.4%
122002	1.0%	1.3%
122100	1.7%	2.5%
122300	0.5%	0.6%
122402	0.5%	0.5%
122500	1.4%	1.2%
122600	1.2%	0.8%
122701	0.3%	0.4%
122702	0.5%	0.2%
122801	0.2%	0.2%
122802	1.1%	1.1%
122902	0.6%	1.2%

Decline Reason by Census Tract

Debt/Income ratio was the most frequently cited reason for declines for 63% of all census tracts.

In second place, Credit history was most frequently cited as a decline reason among all census tracts.

Census	Debt/Inc	Emp	Credit	Collateral	Insuff cash	Unverif	Incomplete	Other
Tract		ΗХ	Hx		(downpay/	Info		
					closing)			
111315	40.0%	0.0%	35.0%	0.0%	0.0%	5.0%	15.0%	5.0%
111316	51.4%	0.0%	18.9%	5.4%	5.4%	2.7%	10.8%	5.4%
111402	53.3%	0.0%	0.0%	0.0%	13.3%	6.7%	13.3%	13.3%
111407	41.7%	0.0%	25.0%	8.3%	0.0%	8.3%	8.3%	8.3%
111408	22.2%	0.0%	33.3%	0.0%	0.0%	0.0%	22.2%	22.2%
111409	33.3%	6.7%	26.7%	0.0%	0.0%	13.3%	20.0%	0.0%
111410	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	50.0%	0.0%
111505	25.0%	0.0%	25.0%	0.0%	0.0%	0.0%	50.0%	0.0%
111506	9.1%	0.0%	45.5%	0.0%	0.0%	0.0%	36.4%	9.1%
111513	16.7%	0.0%	33.3%	16.7%	16.7%	16.7%	0.0%	0.0%
111514	35.7%	7.1%	35.7%	0.0%	0.0%	0.0%	21.4%	0.0%
111516	29.4%	5.9%	17.6%	5.9%	11.8%	5.9%	11.8%	11.8%
111522	36.8%	0.0%	10.5%	5.3%	0.0%	5.3%	15.8%	26.3%
111525	20.0%	0.0%	40.0%	0.0%	40.0%	0.0%	0.0%	0.0%
111526	16.7%	0.0%	0.0%	16.7%	0.0%	0.0%	50.0%	16.7%
111529	26.3%	0.0%	21.1%	10.5%	0.0%	0.0%	15.8%	26.3%
111530	14.3%	0.0%	14.3%	28.6%	14.3%	14.3%	7.1%	7.1%
111531	36.4%	0.0%	0.0%	0.0%	0.0%	0.0%	9.1%	54.5%
111532	31.8%	0.0%	13.6%	0.0%	0.0%	9.1%	27.3%	18.2%
111534	40.0%	0.0%	10.0%	0.0%	10.0%	0.0%	30.0%	10.0%

111540 31.3% 0.0% 43.8% 6.3% 0.0% 6.3% 12.5% 0.0% 111542 23.8% 0.0% 33.3% 0.0% 14.3% 0.0% 44.8% 23.8% 111544 33.3% 0.0% 14.3% 0.0% 20.0% 0.0% 111545 14.3% 0.0% 57.1% 14.43% 0.0% 0.0% 20.0% 111552 36.4% 0.0% 27.3% 18.2% 0.0% 0.0% 20.0% 111555 36.4% 0.0									
111544 33.3% 0.0% 19.0% 0.0% 14.3% 9.5% 23.8% 0.0% 111545 14.3% 0.0% 57.1% 14.3% 0.0% 14.3% 0.0% 20.0% 111546 40.0% 0.0% 13.3% 6.7% 0.0% 0.0% 20.0% 20.0% 10.0% 10.0% 20.0% 0.0%<	111540	31.3%	0.0%	43.8%	6.3%	0.0%	6.3%	12.5%	0.0%
111545 14.3% 0.0% 57.3% 14.3% 0.0% 14.3% 0.0% 20.0% 111556 36.4% 0.0% 27.3% 18.2% 0.0% 0.0% 9.1% 111555 36.4% 0.0% 27.3% 18.2% 0.0% 0.0% 0.0% 0.0% 111555 36.0% 0.0% 27.3% 18.2% 0.0% <th0.0%< th=""> <th0.0%< th=""> 0.0%</th0.0%<></th0.0%<>			0.0%						
111546 40.0% 0.0% 13.3% 6.7% 0.0% 0.0% 20.0% 20.0% 111552 36.4% 0.0% 27.3% 18.2% 0.0% 0.0% 9.1% 9.1% 111553 50.0% 0.0% 25.0% 0.0%	111544	33.3%	0.0%		0.0%	14.3%	9.5%	23.8%	0.0%
11155236.4%0.0%27.3%18.2%0.0%0.0%9.1%9.1%11155350.0%0.0%25.0%0.0%25.0%0.0%0.0%0.0%0.0%11155440.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%100.0%1115550.0%0.0%14.3%14.3%0.00%100.0%0.0%0.0%100.0%1115590.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%100.0%1115590.0%0.0%45.8%0.0%4.2%4.2%12.5%0.0%11156145.5%0.0%9.1%9.1%18.2%0.0%18.2%0.0%11156223.5%0.0%35.3%11.8%5.9%11.8%5.9%11.8%0.0%11156330.4%0.0%25.0%6.3%0.0%28.6%0.0%13.0%11.5%11156928.6%0.0%14.3%0.0%28.6%0.0%0.0%0.0%11157025.0%0.0%20.0%0.0%0.0%25.0%0.0%11310228.6%0.0%20.0%0.0%0.0%25.0%0.0%11310224.9%0.0%14.3%0.0%20.0%0.0%25.0%0.0%11310225.0%0.0%0.0%0.0%10.5%10.5%10.5%10.5%11310940.0%0.0%0.0%0.0%0.0%0.0%10.5%10.5%1131	111545	14.3%	0.0%	57.1%	14.3%	0.0%	14.3%	0.0%	0.0%
111553 50.0% 0.0% 25.0% 0.0% 25.0% 0.0% 0.0% 20.0% 111556 40.0% 0.0% 0.0% 0.0% 0.0% 0.0% 20.0% 111557 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 111559 0.0% 0.0% 0.0% 0.0% 4.2% 4.2% 0.0% 0.0% 111560 33.3% 0.0% 45.3% 0.0% 4.2% 4.2% 0.0% 111561 45.5% 0.0% 5.3% 11.8% 5.9% 11.8% 5.9% 111562 23.5% 0.0% 25.0% 6.3% 0.0% 6.3% 4.3% 4.3% 4.3% 4.3% 4.3% 4.3% 13.0% 11156 30.4% 0.0% 20.0% 0.0% 0.0% 20.0% 10.0% 20.0% 10.0% 10.0% 20.0% 113.0% 113.0% 20.0% 20.0% 10.0% 20.0% 10.0% 20.0%	111546	40.0%	0.0%	13.3%	6.7%	0.0%	0.0%	20.0%	20.0%
111556 40.0% 0.0% 20.0% 0.0% 0.0% 20.0% 111557 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 111558 42.9% 0.0% 14.3% 14.3% 0.0% 28.6% 0.0% 0.0% 111559 0.0% 0.0% 0.0% 0.0% 100.0% 0.0% 0.0% 111560 33.3% 0.0% 45.8% 0.0% 4.2% 12.5% 0.0% 111561 45.5% 0.0% 9.1% 9.1% 18.2% 0.0% 18.8% 0.0% 111562 23.5% 0.0% 5.3% 11.8% 5.9% 11.8% 5.9% 111563 30.4% 0.0% 25.0% 6.3% 0.0% 6.3% 0.0% 10.0% 111569 28.6% 0.0% 14.3% 28.6% 0.0% 20.0% 113.0% 113.0% 113.0% 20.0% 20.0% 20.0% 20.0% 20.0% 20.0% 20.0%	111552	36.4%	0.0%	27.3%	18.2%	0.0%	0.0%	9.1%	9.1%
1115570.0%0.0%0.0%0.0%0.0%0.0%0.0%11158842.9%0.0%14.3%14.3%0.0%28.6%0.0%0.0%1115590.0%0.0%0.0%0.0%0.0%100.0%0.0%0.0%11156033.3%0.0%45.8%0.0%4.2%4.2%12.5%0.0%11156145.5%0.0%9.1%9.1%18.2%0.0%18.2%0.0%11156223.5%0.0%35.3%11.8%5.9%11.8%5.9%11.8%5.9%11156330.4%0.0%25.0%6.3%0.0%28.6%0.0%10.0%11156428.6%0.0%14.3%4.3%4.3%4.3%13.0%11156528.6%0.0%14.3%0.0%20.0%20.0%20.0%20.0%20.0%11150520.0%0.0%20.0%20.0%0.0%0.0%20.0%20.0%11310214.3%0.0%0.0%0.0%0.0%14.3%0.0%20.0%11310325.0%0.0%0.0%0.0%0.0%0.0%20.0%10.0%1131040.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%11310525.6%0.0%0.0%0.0%0.0%0.0%0.0%0.0%11310440.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%11311515.8%0.0%0.0% <t< td=""><td>111553</td><td>50.0%</td><td>0.0%</td><td>25.0%</td><td>0.0%</td><td>25.0%</td><td>0.0%</td><td>0.0%</td><td>0.0%</td></t<>	111553	50.0%	0.0%	25.0%	0.0%	25.0%	0.0%	0.0%	0.0%
11155842.9%0.0%14.3%14.3%0.0%28.6%0.0%0.0%111590.0%0.0%0.0%0.0%100.0%100.0%0.0%0.0%1115033.3%0.0%45.8%0.0%44.2%4.2%112.5%0.0%1115145.5%0.0%35.3%11.8%5.9%5.9%11.8%5.9%11156223.5%0.0%35.3%11.8%5.9%13.8%0.0%11156343.8%0.0%25.0%6.3%0.0%6.3%18.8%0.0%11156430.4%0.0%39.1%4.3%4.3%4.3%4.3%4.3%13.0%11156528.6%0.0%10.5%0.0%0.0%0.0%25.0%0.0%0.0%25.0%0.0%0.0%25.0%11310525.0%0.0%25.0%0.0%0.0%0.0%0.0%20.0%1131014.3%0.0%28.6%10.5%1131040.0%0.0%25.0%75.0%0.0%10.5%15.3%10.5%15.3%10.5%11310525.0%0.0%0.0%0.0%0.0%0.0%20.0%11311040.0%0.0%25.0%0.0%20.0%11310515.8%0.0%0.0%0.0%0.0%0.0%10.5%15.3%10.5%10.5%11310515.8%0.0%0.0%0.0%0.0%0.0%0.0%10.5%10.5%10.5%11311040.0%0.0%<	111556	40.0%	0.0%	0.0%	20.0%	0.0%	0.0%	20.0%	20.0%
1115590.0%0.0%0.0%0.0%100.0%0.0%0.0%11156133.3%0.0%45.8%0.0%4.2%4.2%12.5%0.0%11156145.5%0.0%55.3%11.8%5.9%11.8%5.9%11.8%5.9%11156223.5%0.0%55.3%11.8%5.9%11.8%5.9%11.8%5.9%11156743.8%0.0%25.0%6.3%0.0%6.3%18.8%0.0%11156830.4%0.0%25.0%6.3%0.0%28.6%0.0%25.0%11157025.0%0.0%20.0%0.0%20.0%0.0%20.0%0.0%20.0%1130520.0%0.0%20.0%0.0%0.0%20.0%0.0%20.0%0.0%20.0%11310214.3%0.0%0.0%0.0%10.0%10.0%20.0%0.0%20.0%11310352.6%0.0%0.0%0.0%0.0%20.0%0.0%0.0%20.0%1131040.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%11310540.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%11310440.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%11310540.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%<	111557	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%
111560 33.3% 0.0% 45.8% 0.0% 4.2% 4.2% 12.5% 0.0% 111561 45.5% 0.0% 35.3% 11.8% 5.9% 5.9% 11.8% 5.9% 111562 23.5% 0.0% 35.3% 11.8% 5.9% 5.9% 11.8% 5.9% 111567 43.8% 0.0% 25.0% 6.3% 0.0% 4.3% 4.3% 4.3% 4.3% 13.0% 111563 30.4% 0.0% 39.1% 4.3% 4.3% 4.3% 4.3% 13.0% 111570 25.0% 0.0% 20.0% 20.0% 0.0% 25.0% 20.0% 113102 14.3% 0.0% 20.0% 20.0% 0.0% 0.0% 20.0% 113104 0.0% 0.0% 25.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 10.5% 113.1% 10.5% 10.5% 113.1% 10.5% 0.0% 10.5% 10.5%	111558	42.9%	0.0%	14.3%	14.3%	0.0%	28.6%	0.0%	0.0%
111561 45.5% 0.0% 9.1% 9.1% 18.2% 0.0% 18.2% 0.0% 111562 23.5% 0.0% 35.3% 11.8% 5.9% 5.9% 11.8% 5.9% 111567 43.8% 0.0% 25.0% 6.3% 0.0% 6.3% 4.3% 4.3% 4.3% 13.0% 111568 30.4% 0.0% 14.3% 28.6% 0.0% 28.6% 0.0% 25.0% 0.0% 111509 28.6% 0.0% 20.0% 0.0% 20.0% 20.0% 0.0% 25.0% 20.0% 113102 14.3% 0.0% 20.0% 20.0% 0.0% 0.0% 20.0% 113102 14.3% 0.0% 20.0% 20.0% 0.0% 0.0% 20.0% 14.3% 0.0% 20.0% 113104 0.0% 0.0% 0.0% 0.0% 0.0% 20.0% 10.5% 113.1% 10.5% 113.1% 10.5% 10.5% 113.1% 10.5% 10.5%	111559	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%
11156223.5%0.0%35.3%11.8%5.9%5.9%11.8%5.9%11156743.8%0.0%25.0%6.3%0.0%6.3%18.8%0.0%11156830.4%0.0%39.1%4.3%4.3%4.3%4.3%4.3%13.0%11156928.6%0.0%14.3%28.6%0.0%28.6%0.0%20.0%0.0%25.0%0.0%11300520.0%0.0%25.0%0.0%20.0%0.0%25.0%20.0%11310214.3%0.0%20.0%20.0%0.0%0.0%20.0%0.0%11310214.3%0.0%0.0%42.9%0.0%14.3%0.0%20.0%1131040.0%0.0%0.0%0.0%0.0%50.0%25.0%0.0%11310525.0%0.0%0.0%0.0%0.0%53.3%15.8%10.5%11310852.6%0.0%0.0%0.0%0.0%25.0%0.0%14.3%0.0%11311042.9%0.0%0.0%0.0%25.0%0.0%10.5%10.5%11.5%1131120.0%0.0%25.0%0.0%25.0%0.0%20.0%10.5%10.5%1131120.0%0.0%33.3%0.0%0.0%20.0%0.0%10.5%10.5%11311515.8%0.0%33.3%0.0%0.0%0.0%0.0%10.5%11311640.0%0.0%33.3%0.0%0.0%<	111560	33.3%	0.0%	45.8%	0.0%	4.2%	4.2%	12.5%	0.0%
111567 43.8% 0.0% 25.0% 6.3% 0.0% 4.3% 4.3% 4.3% 4.3% 4.3% 111568 30.4% 0.0% 39.1% 4.3% 4.3% 4.3% 4.3% 4.3% 13.0% 111569 28.6% 0.0% 14.3% 28.6% 0.0% 25.0% 0.0% 20.0% 0.0% 25.0% 0.0% 10.0%	111561	45.5%	0.0%	9.1%	9.1%	18.2%	0.0%	18.2%	0.0%
11156830.4%0.0%39.1%4.3%4.3%4.3%4.3%4.3%13.0%111569 28.6% 0.0%14.3%28.6%0.0%28.6%0.0%0.0%111570 25.0% 0.0%20.0%0.0%0.0%25.0%0.0%11300520.0%0.0%20.0%20.0%0.0%0.0%20.0%113102 14.3% 0.0%0.0%20.0%14.3%0.0%28.6%1131040.0%0.0%25.0%75.0%0.0%0.0%0.0%0.0%11310725.0%0.0%0.0%0.0%0.0%50.0%25.0%0.0%11310852.6%0.0%10.5%5.3%0.0%5.3%15.8%10.5%11310940.0%0.0%0.0%0.0%0.0%0.0%20.0%14.3%0.0%11311042.9%0.0%0.0%25.0%0.0%25.0%0.0%10.5%1131120.0%0.0%20.0%0.0%25.0%0.0%20.0%10.5%11311515.8%0.0%20.0%0.0%0.0%20.0%10.5%10.5%11311640.0%0.0%33.3%0.0%0.0%0.0%0.0%0.0%11311733.3%0.0%33.3%0.0%0.0%16.7%0.0%11311950.0%0.0%33.3%0.0%0.0%16.7%0.0%11311039.5%2.6%5.3%2.6%5.3%10.5%<	111562	23.5%	0.0%	35.3%	11.8%	5.9%	5.9%	11.8%	5.9%
11156928.6%0.0%14.3%28.6%0.0%28.6%0.0%0.0%11157025.0%0.0%20.0%0.0%0.0%25.0%25.0%11300520.0%0.0%20.0%20.0%0.0%0.0%20.0%11310214.3%0.0%0.0%42.9%0.0%14.3%0.0%28.6%1131040.0%0.0%25.0%75.0%0.0%0.0%0.0%0.0%11310725.0%0.0%0.0%0.0%50.0%25.0%0.0%11310852.6%0.0%10.5%5.3%0.0%5.3%115.8%10.5%11310940.0%0.0%0.0%0.0%0.0%0.0%20.0%20.0%11311142.9%0.0%0.0%25.0%0.0%14.3%0.0%20.0%1131120.0%0.0%0.0%25.0%0.0%14.3%0.0%10.5%11311315.8%0.0%25.0%0.0%25.0%0.0%10.5%10.5%11311440.0%0.0%20.0%20.0%0.0%20.0%20.0%11311315.8%0.0%33.3%0.0%0.0%0.0%20.0%20.0%11311440.0%0.0%33.3%0.0%0.0%10.5%10.5%10.5%11311350.0%25.0%0.0%0.0%0.0%10.6%10.6%10.6%11311440.0%0.0%25.0%0.0%0.0%0.0%10.6% </td <td>111567</td> <td>43.8%</td> <td>0.0%</td> <td>25.0%</td> <td>6.3%</td> <td>0.0%</td> <td>6.3%</td> <td>18.8%</td> <td>0.0%</td>	111567	43.8%	0.0%	25.0%	6.3%	0.0%	6.3%	18.8%	0.0%
11157025.0%0.0%25.0%0.0%0.0%25.0%25.0%11300520.0%0.0%20.0%20.0%20.0%0.0%0.0%20.0%11310214.3%0.0%0.0%42.9%0.0%14.3%0.0%28.6%1131040.0%0.0%25.0%75.0%0.0%0.0%0.0%0.0%11310725.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%11310852.6%0.0%10.5%5.3%0.0%5.3%15.8%10.5%11310940.0%0.0%0.0%0.0%0.0%0.0%25.0%0.0%20.0%11311042.9%0.0%0.0%25.0%0.0%25.0%0.0%20.0%1131120.0%0.0%50.0%25.0%0.0%25.0%0.0%10.5%11311315.8%0.0%20.0%25.0%0.0%25.0%0.0%20.0%11311440.0%0.0%20.0%0.0%0.0%0.0%20.0%10.5%11311315.8%0.0%33.3%0.0%0.0%0.0%0.0%10.5%11311440.0%0.0%33.3%2.6%5.3%10.5%18.4%13.2%11311515.8%0.0%25.0%0.0%0.0%0.0%10.6%10.6%11311640.0%0.0%13.2%2.6%5.3%10.5%16.7%0.0%11311335.9%7.6%5.3% <td< td=""><td>111568</td><td>30.4%</td><td>0.0%</td><td>39.1%</td><td>4.3%</td><td>4.3%</td><td>4.3%</td><td>4.3%</td><td>13.0%</td></td<>	111568	30.4%	0.0%	39.1%	4.3%	4.3%	4.3%	4.3%	13.0%
11300520.0%0.0%20.0%20.0%20.0%0.0%0.0%20.0%11310214.3%0.0%0.0%42.9%0.0%14.3%0.0%28.6%1131040.0%0.0%25.0%75.0%0.0%0.0%0.0%0.0%11310725.0%0.0%0.0%0.0%0.0%50.0%25.0%0.0%11310852.6%0.0%10.5%5.3%0.0%53.3%15.8%10.5%11310940.0%0.0%0.0%0.0%0.0%0.0%20.0%0.0%14.3%0.0%11311042.9%0.0%0.0%25.0%0.0%0.0%20.0%0.0%1131120.0%0.0%50.0%25.0%0.0%25.0%0.0%0.0%11311515.8%0.0%20.0%25.0%0.0%25.0%0.0%10.5%11311640.0%0.0%20.0%0.0%0.0%0.0%20.0%0.0%11311733.3%0.0%33.3%0.0%0.0%0.0%0.0%10.5%11311950.0%0.0%33.3%0.0%0.0%0.0%10.6%10.6%11311039.5%2.6%5.3%2.6%5.3%10.5%18.4%13.2%12160541.7%0.0%25.0%0.0%0.0%0.0%0.0%0.0%12160554.5%0.0%18.2%0.0%0.0%0.0%0.0%0.0%12160554.5%0.0%	111569	28.6%	0.0%	14.3%	28.6%	0.0%	28.6%	0.0%	0.0%
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12160654.5%0.0%0.0%18.2%0.0%9.1%9.1%9.1%12160818.2%0.0%18.2%18.2%9.1%0.0%27.3%9.1%12160938.5%7.7%30.8%0.0%0.0%7.7%7.7%7.7%12161025.0%0.0%37.5%12.5%0.0%12.5%12.5%0.0%12161135.3%5.9%17.6%11.8%0.0%0.0%17.6%11.8%12161233.3%0.0%33.3%6.7%0.0%0.0%13.3%13.3%12161340.0%0.0%30.0%20.0%0.0%0.0%0.0%0.0%0.0%121614100.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%	113120	39.5%	2.6%	5.3%	2.6%	5.3%	10.5%	18.4%	13.2%
12160818.2%0.0%18.2%18.2%9.1%0.0%27.3%9.1%12160938.5%7.7%30.8%0.0%0.0%7.7%7.7%7.7%12161025.0%0.0%37.5%12.5%0.0%12.5%12.5%0.0%12161135.3%5.9%17.6%11.8%0.0%0.0%17.6%11.8%12161233.3%0.0%33.3%6.7%0.0%0.0%13.3%13.3%12161340.0%0.0%30.0%20.0%0.0%0.0%0.0%0.0%121614100.0%0.0%0.0%0.0%0.0%0.0%0.0%0.0%	121605	41.7%	0.0%	25.0%	25.0%	0.0%	0.0%	8.3%	0.0%
121609 38.5% 7.7% 30.8% 0.0% 0.0% 7.7% 7.7% 7.7% 121610 25.0% 0.0% 37.5% 12.5% 0.0% 12.5% 12.5% 0.0% 121611 35.3% 5.9% 17.6% 11.8% 0.0% 0.0% 17.6% 11.8% 121612 33.3% 0.0% 33.3% 6.7% 0.0% 0.0% 13.3% 13.3% 121613 40.0% 0.0% 30.0% 20.0% 0.0% 0.0% 0.0% 0.0% 121614 100.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0%	121606	54.5%	0.0%	0.0%	18.2%	0.0%	9.1%	9.1%	9.1%
121610 25.0% 0.0% 37.5% 12.5% 0.0% 12.5% 12.5% 0.0% 121611 35.3% 5.9% 17.6% 11.8% 0.0% 0.0% 17.6% 11.8% 121612 33.3% 0.0% 33.3% 6.7% 0.0% 0.0% 13.3% 13.3% 121613 40.0% 0.0% 30.0% 20.0% 0.0% 0.0% 10.0% 0.0% 121614 100.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0%	121608	18.2%	0.0%	18.2%	18.2%	9.1%	0.0%	27.3%	9.1%
121611 35.3% 5.9% 17.6% 11.8% 0.0% 0.0% 17.6% 11.8% 121612 33.3% 0.0% 33.3% 6.7% 0.0% 0.0% 13.3% 13.3% 121613 40.0% 0.0% 30.0% 20.0% 0.0% 0.0% 10.0% 0.0% 121614 100.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0%	121609	38.5%	7.7%	30.8%	0.0%	0.0%	7.7%	7.7%	7.7%
121611 35.3% 5.9% 17.6% 11.8% 0.0% 0.0% 17.6% 11.8% 121612 33.3% 0.0% 33.3% 6.7% 0.0% 0.0% 13.3% 13.3% 121613 40.0% 0.0% 30.0% 20.0% 0.0% 0.0% 10.0% 0.0% 121614 100.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0%	121610	25.0%	0.0%	37.5%	12.5%	0.0%	12.5%	12.5%	0.0%
121613 40.0% 0.0% 30.0% 20.0% 0.0% 0.0% 10.0% 0.0% 121614 100.0% 0.0%	121611		5.9%	17.6%	11.8%	0.0%	0.0%	17.6%	11.8%
121614 100.0% 0.0%	121612	33.3%	0.0%	33.3%	6.7%	0.0%	0.0%	13.3%	13.3%
121614 100.0% 0.0%	121613	40.0%	0.0%	30.0%	20.0%	0.0%	0.0%	10.0%	0.0%
121615 12.5% 0.0% 25.0% 12.5% 0.0% 25.0% 25.0% 0.0%	121614		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	121615	12.5%	0.0%	25.0%	12.5%	0.0%	25.0%	25.0%	0.0%

121702	25.0%	12.5%	25.0%	0.0%	12.5%	12.5%	12.5%	0.0%
121703	42.9%	0.0%	14.3%	14.3%	14.3%	0.0%	0.0%	0.0%
121704	66.7%	0.0%	0.0%	0.0%	0.0%	33.3%	0.0%	0.0%
121904	16.7%	0.0%	0.0%	0.0%	0.0%	33.3%	50.0%	0.0%
121906	0.0%	0.0%	16.7%	0.0%	16.7%	0.0%	16.7%	50.0%
121907	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%	50.0%	0.0%
122001	66.7%	0.0%	33.3%	0.0%	0.0%	0.0%	0.0%	0.0%
122002	36.4%	0.0%	27.3%	9.1%	0.0%	9.1%	9.1%	9.1%
122100	23.8%	4.8%	23.8%	9.5%	0.0%	0.0%	23.8%	14.3%
122300	40.0%	0.0%	0.0%	40.0%	0.0%	20.0%	0.0%	0.0%
122402	50.0%	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%
122500	30.0%	10.0%	10.0%	30.0%	0.0%	10.0%	0.0%	10.0%
122600	57.1%	0.0%	28.6%	14.3%	0.0%	0.0%	0.0%	0.0%
122701	66.7%	0.0%	0.0%	0.0%	0.0%	0.0%	33.3%	0.0%
122702	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
122801	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%
122802	22.2%	0.0%	33.3%	11.1%	11.1%	0.0%	22.2%	0.0%
122902	20.0%	0.0%	30.0%	10.0%	0.0%	10.0%	10.0%	20.0%
Grand								
Total	33.7%	1.1%	22.2%	8.9%	3.6%	5.8%	14.4%	10.0%

V. Potential Impediment to Fair Housing – Fair Lending

Although more analysis of 2024 and future data is needed, it appears that mortgage lending applications submitted by Black or African American, Native Hawaiian or Other Pacific Islander, and Two or More Races populations may have been disproportionately declined. Sample sizes are small for some groups, particularly when further segmenting by income group, but some directional information is offered within this analysis.

Recommendation

Additional monitoring of data over the next few years may give more evidence as to whether Fair Lending practices are adversely affecting these population groups. When segmenting to specific groups by population or census tract, population sizes become too small to be the basis of conclusions. The 2020 Analysis of Impediments found similar challenges for some higher income groups but also did not have enough data within certain populations to definitively conclude some groups have been disproportionately declined.

A. Arlington Policies and Programs

The following section reviews the City's policies and programs and their potential effect on fair housing choice.

Zoning and Land Use

A thorough review of City's Unified Development Code – which includes zoning regulations and requirements, subdivision regulations, dwelling size regulations, design and development standards, review procedures, and other policies related to developing residential housing -- resulted in no findings of explicit policies and regulations that might limit the development of affordable housing.

However, state and national political activity focused on increasing single family density by reducing minimum lot size standards would help promote housing affordability nationwide. Discussions with city leadership, planning, housing authority, developers, nonprofit builders, social service agencies, and fair housing organizations also confirmed that current city public policies are not adversely creating barriers to the development of affordable housing.

National/State Context

In reviewing the city's zoning, it is important to consider the evolving national and statewide currents of thought regarding lot sizes and other ways to increase housing affordability. Across the United States, lawmakers are seeking solutions to the challenges of housing affordability within their communities. At the fall 2024 leadership meeting of the US Conference of Mayors (USCM), mayors from across the country discussed potential innovations in housing and zoning policies. These innovations include ideas about how to reduce the high cost of land by increasing the number of homes on a particular land parcel through increased housing density.

In Texas, property rights advocates and housing affordability advocates in the state legislature have joined together to consider legislation to reduce minimum lot sizes (SB1787); encourage increased density, and allow property owners to build, sell, or rent an accessory dwelling unit (ADU, or a Secondary Living Unit, SLU) on their property (SB1412). Further, these new laws would override any local laws.

Although the two bills did not pass in the 88th legislative session, they are expected to return in some form in the 89th session with potentially stronger support. The passage of these bills would have a seismic change on zoning and regulations in Arlington, potentially paving the way for more housing affordability and attainability.

With the potential for changes imposed by the state in the next year, specifics regarding Arlington's current Unified Development Code are included below:

Zoning

A review of the Arlington City zoning code (Unified Development Code) found a large variety of zoning districts and classifications, including four for single family residence; Residential Medium-Density; Residential Multi-Family; Village on the Green at Tierra Verde, and manufactured homes (considered obsolete.) The code offers a variety of low-density, medium-density, and high-density residential development classifications, with minimum residential lot sizes as small as 5,000 square feet in Cottage Communities. Additionally, the code provides for minimum dwelling size regulations. For example, for development in the VG district, minimum dwelling unit sizes range from 2,250 – 2,750 square feet, depending on the number of units per acre and minimum contiguous acreage.

Overlay Zoning Providing Density Bonuses

Current Arlington overlay mixed use zoning allows for increased density within the Downtown, Entertainment, and Lamar Collins areas. Overlays in some mixed use districts with RMF-22 base zoning (typically allows for maximum of 22 units/acre) allow for higher density to encourage the development of residential and commercial areas.

- Downtown Neighborhood Overlay (DNO)
 - 40 units per acre, and 80 units/acre if mixed use building in mixed use zoning district
- Lamar Collins Mixed Use Overlay (LCMUO)
 - 40 units per acre, and 100 units/acre if mixed use building in mixed use zoning district
- Entertainment District Overlay (EDO)
 - 40 units per acre, and 100 units/acre if mixed use building in mixed use zoning district

Additionally, Arlington zoning rules for Cottage Communities, and Secondary Living Units (SLUs, or ADUs), provide some flexibility in terms of reducing lot and residential unit sizes. For example, the City passed a new cottage community ordinance allowing for units as small as 600 square feet, and with lots of less than 5,000 feet. Per City stakeholders, most of the new cottage developments are rentals based on developers' financial considerations. Please note: the Cottage Communities have not been codified yet in the complete UDC.

The City also has specific plans for Small Areas and Strategic areas throughout the City, including Mixed Use Zoning in East Arlington, the Central Arlington Neighborhood Revitalization Strategy Area (NRSA), Rural Residential Development in southwestern Arlington, Industrial Development

in northeast Arlington, and the development of corridors in northeastern Arlington and around US287.

Because Arlington is 94% built-out, most new residential development will of necessity be infill or redevelopment, prompting some land use questions. Within the City's public meetings/focus groups, a real estate official wondered if more commercial land could be rezoned for residential development; the group discussed the fact that, while the City Council was open to considering such rezoning, there was so little land left in town to develop that it wasn't a huge issue. The City has rezoned 150 acres for residential development, with another 85 acres in the pipeline. Still, remaining land must also be considered for commercial uses.

Potential Impediment to Fair Housing – Minimum Lot Size and ADU/SLU Zoning

Per the National Association of Housing and Redevelopment Officials (NAHRO), approximately 75% of land in US cities is zoned for single-family homes. Arlington also has significant single-family zoning.

Recommendations

It is possible that the Texas State Legislature will impose state standards related to minimum lot size and the increased development of ADUs within all City residential zoning districts within the next few years. Until that change takes place, the City might encourage more "Gentle Density":

- Reducing lot size standards in additional zoning districts, with a focus on potential redevelopment in commercial areas or areas transitioning from commercial to residential
- Consider modification of City design standards that might reduce building costs
- Allowing for the development of Secondary Living Units (SLUs, or Accessory Dwelling Units, ADUs) by right in additional zoning districts

For example, the City might consider:

- Allowing for the redevelopment of duplexes or triplexes on single family corner lots
 - Or for duplexes and triplexes on all single-family lots
- Encouraging and assisting in the development of more cottage communities, including rental cottage communities
- Allowing for the redevelopment of commercial properties as mixed use zoning, with retail on ground floor and housing above

The Downtown Neighborhood Overlay (DNO), Lamar Collins Mixed Use Overlay (LCMUO), and Entertainment District Overlay (EDO) are potential areas to promote this Gentle Density. The

Central Arlington Neighborhood Revitalization Strategy Area (NRSA) and the East Arlington Target Area might also be candidates for these changes.

B. Potential Impediment to Fair Housing – Public Perceptions regarding Increased Density or Multifamily Housing

Interviews with city and community leaders suggest that community resistance challenges to increased density, multifamily housing, or housing affordability measures were based on concerns over traffic, loss of property values, and potential increases in crime.

Recommendations

The City might continue to educate the community on the likely upcoming state zoning changes and how they will impact communities, including the potential for increased density and the increased presence of multifamily housing. At the same time, Arlington can begin to promote some of the Gentle Density practices and their benefits to the City.

As several stakeholders suggested, many of the people priced out of the Arlington housing market are police officers, teachers, first responders, and other essential community workers. Additionally, young people just starting out – "our children," as one stakeholder stated – cannot afford to live in Arlington. By helping the community to understand the benefits of housing affordability and attainability through increased density, community resistance may decrease somewhat.

Development Impact Fees

For new builds, the City assesses impact fees to support infrastructure needs created by new development. A 2017 Amendment to Arlington Ordinance No. 89-49 provides for new fees pursuant to Chapter 395 of the Texas Local Government Code.

Per the City's website, "Chapter 395 of the Texas Local Government Code authorizes the assessment and collection of impact fees in Texas for transportation, water, and wastewater related capital improvements. Impact fees are a one-time charge assessed to new development to help fund roadway, water and/or sewer capital facilities necessitated by that new development. Impact fees are based on the anticipated demand for infrastructure that the new development creates and are assessed on any new development that increases service units. New development does not include pools, residential add-ons, or remodels and interior finishes."⁹

⁹ https://www.arlingtontx.gov/Business/Planning-Development/Planning-Development/Long-Range-Planning/Impact-Fees

These fees do not apply to redeveloped land. With the City 94% built-out, most new housing will be of necessity infill or redevelopment construction, the latter of which would not be subject to impact fees.

The Arlington Capital Improvements Committee reviews the use of all impact fees to ensure they are applied to these developments and the areas immediately around them. Some City developers, particularly nonprofit developers, or Community Housing Development Organizations (CHDOs), seek a reduction in some of the fees for infill housing, or for new development.

C. Potential Impediment to Fair Housing – Development/Impact Fees

While redevelopment construction is not subject to impact fees, the City may consider opportunities to reduce impact fees, particularly for nonprofit developers, to lower housing production costs and thus increase housing affordability.

Recommendations

- There may be an opportunity for the City to scale or delay payment of impact fees according to the assessed value of the property or new dwelling(s) in order to make them more affordable, and to incentivize development of housing for low- to moderate-income families. The Housing Policy Library of localhousingsolutions.org offers examples of practices instituted throughout the US regarding impact fees.
- If ADU/SLUs become more popular, the City might consider reducing impact fees for construction of ADU/SLUs.

Building Codes

About 2/3 of Arlington's housing stock was built prior to 1980, with the median build year for Arlington single-family homes as 1984. City stakeholders noted that many of the City's seniors living in these older homes might not have the finances, time, or expertise to make needed renovations to their homes.

On November 1, 2022, the Arlington City Council adopted the 2021 Editions of the International Building Codes and the 2020 Edition of the National Electrical Code (NEC). Starting January 1, 2023, permit applications are required to be in compliance with the adopted codes. The International Building Code meets the requirements of the American with Disabilities Act (ADA) and the Fair Housing Act (FHA).

Because the City's Fair Housing Officer has had occasional questions regarding accessibility accommodations, she will refer clients to the City's Code Compliance office for more information and consultation.

The City offers various programs to help homeowners renovate and rehabilitate their homes, using HOME funding and general City revenues. In 2023, the City helped to renovate 24 homes.

LIHTC Housing and Expirations

The Arlington Housing Authority and its Executive Director have a variety of tools at their disposal to facilitate the development of affordable housing in Arlington, including assisting developers in proposing 9% Low Income Housing Tax Credit (LIHTC) projects before City Council and navigating city and state processes.

The City's Housing Finance Corporation (AHFC) can serve as general partners for some deals for senior and other housing and offers bond programs for the development of rehab and new construction housing.

Per the Texas Department of Housing and Community Affairs (TDHCA), Arlington is currently home to 19 publicly-subsidized housing developments, including 17 LIHTC developments. Within the next 10 years, three of 19 subsidized housing developments' LIHTC will expire: Artisan at Rush Creek (December 2034), with 248 apartments; Rush Creek (December 2034), with 144 apartments, and The Jerry (November 2033), whose number of apartments was not available online and representatives were not available despite multiple requests.

Neighborhood Revitalization Strategy Areas (NRSA)

The city provides neighborhood development and revitalization support in targeted areas around the city, including the Central Arlington NRSA. Utilizing HOME funding, some of these efforts focus on housing rehabilitation, tenant-based rental assistance, and housing development.

Through CDBG funding, the City focuses on business and job development, public facility development/improvement, housing rehabilitation, neighborhood development and revitalization, and social services within the NRSA and other areas. The City also supports homeless people within the area through ESG funding. These activities include NRSA Code Compliance services for NRSA residents, as well as funding public services including adult literacy, job readiness, and other support services by a local CBDO.

Employment-Housing-Transportation Linkage

One of the City's challenges is offering affordable housing with transportation options to resources throughout the community. Multiple stakeholders noted the importance of providing Entertainment District workers, who often hold low paying, seasonal jobs, with access to transportation to employment.

According to Arlington officials, the City partnered with Trinity Metro Express and Dallas Area Rapid Transit from 2013 to 2017 to pilot a bus route that connected the CentrePort TRE station, the City's Entertainment District and the University of Texas at Arlington (UTA)/Downtown area. The service resulted in only about 350 trips per day, much lower than the projected 900 trips per day. Looking for a more cost-effective solution that would reach more riders, the City transitioned to an on-demand ridershare system.

The City's current approach to public transportation utilizes an on-demand, rideshare system that serves the City's entire 99 square miles as well as providing access to the CentrePort TRE station and the Trinity Metro bus system in northwest Arlington. In contrast to traditional bus service, that would likely include just a few routes throughout the city, the on-demand system is extremely accessible and equitable, offering riders access within a one to two block walk from their location. The service also provides curb to curb service for those that qualify. The on-demand system is also a more cost-effective option. The cost for the City to join a transit authority would cost approximately \$40 million per year while the current on-demand system costs \$9 million per year.

Arlington offers three types of public transportation, which can be booked using an app or by calling a phone number. For Handitran, people can also book rides from a computer.

Arlington On-Demand

Arlington On-Demand is dynamic, on-demand rideshare service that provides riders access to their vehicle within a 1-2 block walk at a cost of \$3-5 per person per ride. Weekly or monthly passes may be purchased to reduce the per-ride cost. This service is offered through a turnkey contract with a vendor.

For lower-income users, the City has been able to utilize federal Community Development Block Grant (CDBG) funding to offer free rides through local nonprofit agency referrals, including those serving homeless people and victims of domestic violence. This program has a limited funding source and has to be carefully monitored through coordination with nonprofit partners.

Arlington On-Demand offers connections to two Trinity Metro bus lines, and the CentrePort Trinity Railway Express (TRE) station. Some neighboring jurisdictions, including Grand Prairie and Mansfield, offer on-demand service that include pickups or drop offs at the UTA and Tarrant County College campuses located within the City of Arlington.

The On-Demand service is well utilized and but has limited resources. As a result, riders may experience difficulty booking a ride during times of high demand, such as peak commute times. For some riders this means the service is not as reliable as they might like. Multi-leg trips must be booked separately, which could also present a challenge for those needing to use the service in that way.

Handitran

Handitran is an on-demand service for seniors and people with disabilities. This service is wheelchair accessible and offers door to door service. The City uses City employees to operate a fleet of 10-12 buses with wheelchair lifts. The buses are supplemented through a contracted service that provides around 22 cabs, about half of which can accommodate wheelchairs. A person fills out an application and pays a \$10 application fee. Once accepted, they can book rides at \$2 per person per ride. Handitran serves the entire city plus 1.5 miles outside of the city limits. The demand for Handitran services is greater than the available capacity, but limited resources and some limitations related to federal funding prevent expansion.

Rapid

Rapid is an on-demand service offering autonomous, self-driving vehicles. This smaller fleet is part of the Arlington On-Demand service mentioned above but operates in a limited area around downtown and UTA. Although it is open to the general public, many of its clients are UTA students, particularly international students with no access to a car or driver's license. When people request rides in the Arlington On-Demand app, they are given the choice of a person-driven or autonomous vehicle. The service is currently free for UTA students.

Unmet Demand

About 20-25% of rides booked on the Arlington On-Demand app are never completed due to a variety of reasons such as riders changing their mind or being unable to get a ride during their preferred timeframe. If a rider gets a seat unavailable message due to high demand, they often obtain a ride by trying to book again in the next few minutes.

Other Transportation Initiatives

The City's Transportation Department also works to improve and maintain the ability to walk and bike safely around town. The City's Hike and Bike System Master Plan offers a roadmap for the city's walking and biking infrastructure, including both on and off-street facilities. The City continues to implement these projects when funding and opportunities arise.

UTA recently implemented a new micro-mobility program, which includes the option to rent scooters and electric bikes for use within a limited area around the University and Downtown. The City supported this effort by changing its transportation ordinance to allow these vehicles to operate in the limited service area. It provides an additional transportation option to any low-income residents needing to move around the area.

Period	On-Demand	Handitran
Oct 23 - Dec 23	11,770	2,191
Jan 24 - Mar 24	19,014	2,321
Apr 24 - Jun 24	22,000	2,331
Jul 24 - Sep 24	14,939	2,247

Active Rider Statistics

Longer Term Plans

Connect Arlington, the City's transportation framework, is focused on providing cost-effective, scalable and innovation technology-based transportation solutions. The document identifies additional potential longer-term initiatives, including potential express bus service in a couple of key corridors as well as the use of newer technologies such as autonomous people movers. The City will also be piloting a new Dynamic Direct Route (DDR) service in 2025 to test the feasibility and efficiency of providing transportation in a different way along corridors where data shows high demand during certain times of the day. The DDR service will initially test direct route services using Arlington On-Demand vehicles during specific times of day to connect the CentrePort TRE Station to the Downtown/University area.

Arlington hopes to offer more reliable on-demand services in the future, especially during peak commute times.

The City will also potentially connect local service to a high-speed rail corridor planned between Fort Worth, Arlington and Dallas. This corridor could offer riders connections to high-speed rail to Houston, Mexico, Oklahoma, and other destinations. Arlington is also exploring Advanced Air Mobility including the development of vertiports to support air taxi travel in the near future, although these would be likely be a more expensive option initially.

D. Potential Impediment to Fair Housing – Additional Employment - Housing -Transportation Linkages

While Arlington offers comprehensive services covering the entire City, some potential enhancements, some of which are already under consideration, may increase the ability of workers to travel to their centers of employment.

Recommendations

- The City could pilot a special Arlington On-Demand service that allows multiple stops for families dropping off children at daycare on their way to work. For example, all stops would have to be completed within a 30-60 minute timeframe.
- To supplement its on-demand services, the City could look to use higher-capacity vehicles to provide transit service along the most used public corridors to major employment centers within Arlington (e.g., the Entertainment District.)
- The City might also consider encouraging additional building incentives in potential areas of future public transit/corridors.

Taxation

Arlington offers several property tax exemptions, especially for those on limited or fixed incomes:

- 20% General Homestead Exemption
- \$60,000 Disabled Persons Exemption
- \$60,000 Over 65 Exemption
- \$5,000-\$12,000 Veterans Exemption

Additionally, when seniors reach 65, their taxes are "frozen" to strengthen future affordability on fixed incomes.

Housing Choice Vouchers Recipient Selection

The City of Arlington has a shortage of affordable, accessible housing. With the rapid population growth and short supply of housing, especially in the lower-priced range, housing options for lower- and moderate-income families are limited. The prevalence of wait lists for housing choice vouchers underscores the need for housing. The tenant selection procedures do not appear to show any bias or discrimination.

The Housing Authority provides 3,347 households with Housing Choice Vouchers, which provide rental assistance to families of on average \$1,168 per month. As rents have risen, this amount has increased and is expected to increase again to \$1,194 by the end of 2024.

The City currently has approximately 26,000 applicants on a waiting list for Housing Choice Vouchers, including 8,228 current Arlington residents. People are pulled off the waitlist utilizing preferences of Residency (the person lives and/or works in Arlington); and Employment (people are employed, but this requirement is not applied to seniors or people with disabilities.) Those meeting these preferences are then selected randomly out of the waiting list.

Children aged 6-17 represent 35% of the people served by Housing Choice Vouchers.

While Housing Choice Vouchers are in great demand, they aren't as well-utilized as the program would like. Among Housing Choice Voucher holders, it takes on average two months to find a rental. However, 18% of voucher holders never find a rental, because some landlords won't accept vouchers, or landlords have other income requirements. Some potential tenants' past criminal or eviction histories also make it difficult to obtain housing.

E. Potential Impediment to Fair Housing – Utilization of Project-Based Vouchers

The City does not offer Project-Based Vouchers (PBVs), due to concerns that they will concentrate poverty. However, Arlington recognizes that PBVs may offer some benefits to households unable to utilize their Housing Choice Voucher. Additionally, HUD is promoting the use of more Project-Based Vouchers. If 18% of current vouchers are not usable, giving Arlington the tools to set up voucher recipients in developments in higher-opportunity neighborhoods would help those families to thrive.

Recommendations

With nearly 20% of HCV holders unable to find a lease, and HUD promoting the use of more Project-Based Vouchers, Arlington might consider some of the following:

- Arlington might consider developing agreements with local landlords to accept a small number of Project-Based Vouchers in higher-opportunity neighborhoods.
- That is, in addition to Housing Choice Vouchers, the City may issue a small number of Project-Based Vouchers to pilot a new housing strategy and scale it up as it becomes more successful
- PBVs may be utilized as gap financing for developments

APPENDIX: A

Agencies and Organizations Whose Insights and Information Helped to Develop Analysis

City of Arlington

Office of the Mayor and Council Office of the City Manager Arlington Housing Authority Code Compliance Department Economic Development Department Grants Management Department Planning and Development Services Department Real Estate Services Department Strategic Initiatives Department Transportation Department

Local, State, and National Partners

Arlington Board of Realtors (ARBOR) Arlington Life Shelter Arlington Independent School District **Arlington Urban Ministries Center for Transforming Lives** Child Care Associates **Development Corp of Tarrant County DRC** Solutions Empathy (Alliance Child and Family Solutions) Hispanic Real Estate Brokers Association (HREBA) Meals on Wheels of Tarrant County MHMR of Tarrant County **Mission Arlington** North Central Texas Area Agency on Aging SafeHaven of Tarrant County The Salvation Army of North Texas Sphinx Development **Tarrant County Homeless Coalition** Texas Department of Housing and Community Affairs **Texas Housing Foundation** Texas Workforce Commission: Civil Rights Division The Nehemiah Company

United Way of Tarrant County US Census US Housing and Urban Development