Analysis of Impediments to Fair Housing Choice

PREPARED BY BLULYNX SOLUTIONS

This Analysis was a joint effort prepared for

The City of Laredo



And
The Laredo Housing Authority



For Submission to the United States Department of Housing & Urban Development





Table of Contents

Executive Summary	2
Background	2
Research Methodology	2
Overview of Findings	4
Demographic Overview	4
Segregation Analysis	5
Disproportionate Housing Needs	5
Publicly Supported Housing Analysis	5
Fair Housing Enforcement, Outreach Capacity, and Resources	6
Impediments & Suggested Actions	6
Introduction	11
Purpose of This Research	13
Community Participation Process	14
Assessment of Past Goals, Actions, Strategies	17
Demographic Overview	19
General Issues	37
Segregation Analysis	37
Disparity in Access to Opportunity	66
Disproportionate Housing Needs	92
Publicly Supported Housing Analysis	96
Fair Housing Enforcement, Outreach Capacity, and Resources	105
Section 504 Compliance	108
Hate Crime Data	108
Impediments & Suggested Actions	109

Executive Summary

Background

The City of Laredo, as an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) is required to submit certification of affirmatively furthering fair housing. This certification has three elements and requires that the City:

- 1. Complete an Analysis of Impediments to Fair Housing Choice (AI);
- 2. Take actions to overcome the effects of any impediments identified; and
- 3. Maintain records reflecting the actions taken in response to the analysis.

HUD describes impediments to fair housing choice in terms of their applicability to local, state and federal law. The federal Fair Housing Act defines impediments as:

Any actions, omissions or decisions taken because of race, color, religion, sex, national origin, familial status, and mental or physical disability which restrict housing choices or the availability of housing choice.

The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions, particularly for persons who are protected under fair housing law. AI sources include census data, employment and income information, federal and state fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain.

An AI also includes an involved public input and review process via direct contact with stakeholders, public forums to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and possible actions to overcome the identified impediments.

Research Methodology

The 2018 City of Laredo Analysis of Impediments to Fair Housing Choice offers a thorough examination of a variety of sources related to housing, such as demographic change, economic influences, and the state of the housing market, but also information pertaining to affirmatively furthering fair housing, the state of the fair housing delivery system and housing transactions affecting people throughout Laredo. This information was collected and evaluated through four general approaches:

1. *Primary Research* – the collection and analysis of raw data that did not previously exist.

- 2. *Secondary Research* the review of existing data and studies.
- 3. *Quantitative Analysis* the evaluation of objective, measurable and numerical data.
- 4. *Qualitative Analysis* the evaluation and assessment of subjective data, such as people's beliefs, feelings, attitudes, opinions and experiences.

Some of the baseline secondary and quantitative data providing a picture of the city's housing marketplace were drawn from the 2010 census and intercensal estimates. These data included population, personal income, poverty estimates, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Economic Analysis, the Bureau of Labor Statistics and a variety of other sources. The narrative below offers a brief description of other key data sources employed for the 2018 Laredo AL.

Community Engagement

• Stakeholder Surveys in conjunction with this Analysis- a survey was designed to collect information from community stakeholders. These surveys were distributed in hard-copy format and were also hosted online through SurveyMonkey.com to provide an alternative means of response.

The Fair Housing Survey was designed to collect input from a broad spectrum of the community and received responses from City of Laredo residents and non-residents. The survey consisted of 32 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 135 responses to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey respondents are cited in this Analysis, it refers only to the percentage of respondents to the question being discussed and may not be a percentage of the full 135 survey respondents.

Surveys were received over from November 21, 2017 to February 28, 2018. Paper surveys received were manually entered by the Survey Administrator into SurveyMonkey for tabulation and analysis. To prevent "ballot stuffing", the Survey Monkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists.

Stakeholder Interviews – Key groups of community stakeholders were identified, contacted, and interviewed as part of this Analysis. These stakeholders included representatives of nonprofit organizations (especially nonprofit housing developers), municipal officials, City of Laredo staff, fair housing advocates, members of City Council, and homeless service providers. Other stakeholders not belonging to any of

these groups were occasionally interviewed as dictated by the course of research carried out for this Analysis.

• **Public Meetings** – Four public meetings were held to provide a forum for City of Laredo residents and other interested parties to contribute to this Analysis. These meetings were held on Monday, November 20, at 2:00pm and 5:00pm at the Laredo Public Library, at 11:00am at the Laredo Housing Authority, and at 9:00am at the Haynes Recreation Center providing a variety of options for residents to attend. These meetings were advertised via flyers distributed by the City of Laredo using its various mailing distribution lists. Local libraries and nonprofits receiving the posters were asked to print and post or distribute them as appropriate. The format of these meetings ranged from small-group roundtable discussions to moderated forums. Notes were taken of the public comments at all meetings.

Overview of Findings

Demographic Overview

Laredo is the county seat of Webb County, Texas, and located on the north bank of the Rio Grande in South Texas, across from Nuevo Laredo, Tamaulipas, Mexico. The city is one of Texas most populous cities and is the third-most populated on the Mexican border. The demographics throughout the city has remained consistent over time as the city of Laredo has experienced only a 2% increase in the Hispanic population from 1990 to 2010 and 40% decrease in White populations. The African American population in Laredo has grown slightly from 1990 to 2010, representing less than 1% of the total population. Since 1990, Hispanic residents have remained the majority population in the city of Laredo. Demographic patterns suggest that white and black, non-Hispanic residents are choosing to live outside the city of Laredo.

Throughout the region, the total population grew approximately 88% from 1990 to 2010. The Hispanic population saw the largest growth throughout the region for all ethnic groups in the region, increasing from 125,041 in 1990 to 239,653 in 2010. A corresponding higher level of growth occurred within the city of Laredo, as the Hispanic population grew from 122,258 to 222,412. The majority of foreign born residents in 2010 were from Mexico and Honduras, representative of the local immigrant and refugee community. Although still a small segment of the population, residents with limited English proficiency primarily spoke Spanish, Korean, and Tagalog (Filipino language).

On a regional level, approximately 29% of residents are impacted by disabilities. Individuals report ambulatory difficulties at the highest rate (7.1%) followed by cognitively difficulty (6.2%) and independent living difficulty (4.9%). / The two largest population groups by age of residents in Laredo are between 18 and 65 and 18 and under.

Segregation Analysis

Laredo is a majority minority city with approximately 95.4 percent of its population identifying as minority in 2016, according to Census ACS estimates. Laredo is one of the least ethnically diverse cities in the United States. However, when comparing economic diversity, household diversity, and social class diversity, the City of Laredo is much more diverse.

The dissimilarity index shows a low level of segregation for Laredo and the region. The highest levels, in order, exist between Asian or Pacific-Islander/White and Non-White/White residents in the City and the region. Asian or Pacific-Islander/White is the only comparison group that demonstrates a moderate level of segregation. Overall, the dissimilarity index for all racial/ ethnic groups is lower for the region than the city in 1990, 2000 and 2010.

Disproportionate Housing Needs

Housing Problems

HUD defines housing problems as a household experiencing one or more of the following issues: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 30 percent. HUD further defines severe housing problems as having more than 1.5 persons per room and a cost burden greater than 50 percent. The lack of opportunity to build quality, affordable housing in multi-family units due to a disproportionate amount of land allocated to single-family uses certainly affects the ability of families to meet their housing needs. Furthermore, areas where homes for people with disabilities can be constructed or developed are extremely limited and, in most cases, require planning approval and public hearings.

According to the most recent Comprehensive Housing Affordability Strategy (CHAS) data provided by HUD, nearly a half of all households (65,015) experience housing problems and just over 31 percent of those households experience severe housing problems. A review of data provides an overall view of the housing needs including number and type of household and those experiencing housing problems including substandard conditions, overcrowding, and cost burdens, for both renters and owners¹.

Publicly Supported Housing Analysis

Publicly supported housing analysis includes an examination of public housing; Project-Based Section 8; Other HUD Multifamily Assisted developments; and the Housing Choice Voucher (HCV) Program. The Project-Based Section 8 category includes only those subsidized housing developments where the owner has a contract directly with HUD, and does not include project-based developments where the owner has a Housing Assistance Payment contract directly with the Laredo Housing Authority. LHA administered vouchers,

¹ HUD Consolidated Planning/CHAS data, https://www.huduser.gov/portal/datasets/cp.html

both for tenant-based and project-based units, are included in the HCV Program category. As a point of reference, HUD data combines race and ethnicity, i.e. a Black or White Hispanic resident is classified in the HUD tables only as Hispanic and is not counted separately as either Black or White.

Fair Housing Enforcement, Outreach Capacity, and Resources

HUD's Fort Worth Regional Office of Fair Housing and Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. From January 1, 2007 to December 31, 2017, within the City of Laredo, 20 such complaints originated. Disability was the most common basis with 14 of the 20 (70 percent) of all complaints filed in Laredo during this period and national origin was the second most common at 15 percent of complaints.

The Texas Workforce Commission ("TWC") is the entity responsible for enforcing the Fair Housing Act in the State of Texas. Complaints are received up to one year after an alleged violation. TWC accepts complaints via email, fax, hand delivery, online, or mail. A Freedom of Information Request (FOIA) was submitted to TWC for all fair housing complaints from January 1, 2007 through December 31, 2017. TWC responded that the City of Laredo did not have any on-going, pending, or completed fair housing complaints from 2007 through 2017.

Impediments & Suggested Actions

The 2018 Analysis of Impediments for the City of Laredo revealed several impediments to fair housing choice. The key issues identified below are accompanied by suggested actions the City will implement in order to alleviate these impediments. These actions were designed to offer greater housing choice to the protected classes' frequently experiencing discrimination in the housing market throughout the City of Laredo.

Impediment: Lack of Available Housing Units

Lack of affordable housing exacerbates housing discrimination. Many communities are experiencing a tight housing market, allowing landlords to be highly selective in tenant selections which may disguise some illegal discrimination. Tight housing markets sometimes relates to landlords not taking care of the physical condition of their housing unit. Lack of available housing units based on number of bedrooms is also problematic. The development of new housing is expensive and costs continue to outpace increases in income. Housing development in rural areas is often more difficult due to lower income and higher development costs due to remoteness and lack on contractors and suppliers. The middle fifty percent of household incomes are often in a limbo were their income is too much to qualify for vouchers and housing assistance, yet not enough to support their family

at full market rents. This is compounded with the family size trending larger and multigenerational families living together than past populations, increasing the need for larger three plus bedroom housing units throughout Laredo.

Continued access to funding is vital for development of new housing and rehabilitation of existing housing. Educational efforts are needed to understand the importance of affordable housing in every community.

Action Steps:

- 1. Increasing availability of affordable and habitable housing units provides individuals and families with choices allowing them the ability to find housing units that are suitable and affordable.
- 2. The City of Laredo will continue to evaluate the effectiveness of its financial resources with the goal of increasing production of affordable housing and search for opportunity for additional funding to help alleviate the vulnerable position of underserved households seeking housing opportunity.
- 3. Consider set-aside of funds or program changes that effectively support housing development.
- 4. Continue to work with local nonprofit housing organizations to allocated federal funding for rehabilitation of existing housing units and ability to change ownership of vacant lots and abandoned homes throughout the City.

Impediment: Lack of Fair Housing Education

Lack of knowledge and education often hinders success for both renters and homeowners. Many individuals are aware of fair housing protections but don't clearly understand them or how to recognize or address potential discrimination when it occurs. In addition, many renters and homeowners have not been exposed to or learned basic life skills, budgeting, how to maintain their property or what is expected with landlord/tenant or lender/borrower relationships.

Through the public survey and public meetings it was noted that there is a need for additional education. Education for renter's responsibilities, maintaining your property, and fair housing were the topics of interest. Survey results indicated over 85 percent of survey respondents in Laredo had never experienced discrimination. Furthermore, only 20 percent of responded stated they knew where to file a complaint if they had been discriminated against. While the majority of survey respondents noted they had never experience

discrimination this high percentage could be attributed to their lack of knowledge of the laws regarding fair housing discrimination.

The fair housing education and outreach arena is primarily covered by various federally funded fair housing organizations, including the Texas Workforce Commission Civil Rights Division and the Office of Fair Housing and Equal Opportunity. It is unclear whether the current fair housing organizational work directly relates to the number of fair housing complaints filed with enforcement agencies. However, it is important to note that while enforcement agency caseloads may not appear high, numerous fair housing cases are settled or resolved through advocacy outside of administrative enforcement, including through the HUD funded programs such as the Fair Housing Initiative Programs (FHIP), fair housing education training is vital for increasing awareness in a community in which discriminatory practices are occurring.

Awareness and education are ways to offset NIMBYism (Not In My Back Yard), spreading community success stories and developing awareness of what is fair housing should help to alleviate the impediment. All protected classes are expected to benefit from this activity but especially those who are most disproportionately impacted by discrimination, persons with disabilities households with familial status, and those of lower income.

Action Steps:

- 1. Increasing the opportunity for individuals and agencies to learn the important aspects of housing education to increase opportunity for success.
- 2. Provide additional fair housing trainings for tenant groups, Laredo Housing Authority clients, human service agencies, multi-cultural organizations, realtors, lenders, in addition to other targeted groups.

Impediment: Economic Issues Affect Housing Choice

There is a lack of economic opportunities in the City which prevents lower income households from increasing their income and ability to live outside areas with concentrations of low-income households, which makes this a fair housing concern. Housing segregation by class tends to impact how people live and affects every aspect of their lives—their quality of life, access to transportation, employment opportunities, access to decent health care, and, perhaps most important, access to good schools.

Action Steps:

1. Strengthen partnerships and program delivery that will enhance the City's business base, expand its tax base, and create a more sustainable economy for all residents and businesses.

- 2. Support and enhance workforce development and skills training that result in a "livable" wage and increases job opportunities.
- 3. Support programming that enhances entrepreneurship and small business development, expansion, and retention within impacted areas and high poverty neighborhoods.
- 4. Support the expansion of existing businesses that will create new job opportunities for the unemployed and underemployed.

Impediment: Racially/Ethnically Concentered Areas and Impact on Opportunity

Racially/ethnically concentrated areas of poverty ("impacted areas") have suffered from disinvestment and face challenges in providing housing choice that offers meaningful access to opportunity. Neighborhoods in Laredo that are identified as "areas of concentrated poverty," strongly correlate with areas of racially/ethnically concentrated poverty due to historical segregation and inequities, typically lack the professional, social, health, and safety opportunities found in communities with greater financial resources. Such opportunities would not likely exist unless otherwise stimulated through investments.

For example, areas of the City that have higher percentage of owner-occupied units and characterized as predominantly White have both a smaller percentage of families with children, and a higher index of access to proficiency schools, compared to other areas. On the other hand, other racial/ethnic groups such as Blacks, Hispanics, Asians, tend to live in areas of the City where there are high number of aging renter-occupied units and have either moderate or low access to proficient schools according to the access to School Proficiency Index provided by HUD. Comparatively, Laredo's Job Proximity Index categories at the City level revealed White, Asian, and Native American populations have scores above 55, indicating homes in closer proximity to work places than those of Black and Hispanic populations, which show scores of 52.10 and 46.11, respectively. Additionally, access to the downtown transit center and the Mall de Norte is somewhat limited for Laredo residents as well as transportation to the bridge to Nuevo Laredo.

Action Steps:

- 1. Improved evaluation and funding criteria for housing investments in areas in need of comprehensive neighborhood revitalization.
- 2. Sustain and enhance a commitment to invest in high poverty areas to increase community revitalization in low-income areas.

3.	Examine, with input from local partners, how to best measure and evaluate the extent to which neighborhood revitalization actually occurs as a result of housing investment in concert with a revitalization plan.

Introduction

Title VIII of the 1968 Civil Rights Act, also known as the federal Fair Housing Act, made it illegal to discriminate in the buying, selling or renting of housing because of a person's race, color, religion or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

- The Fair Housing Act,
- The Housing Amendments Act, and
- The Americans with Disabilities Act.

State or local governments may enact fair housing laws that extend protection to other groups as well. For example, the Texas Fair Housing Act, protects individual's right to rent an apartment, buy a home, obtain a mortgage, or purchase homeowners insurance free from discrimination based on: race, color, national origin, religion, sex, familial status, and disability.

Why Assess Fair Housing?

Provisions to affirmatively further fair housing are long-standing components of HUD's housing and community development programs. These provisions flow from Section 808(e) (5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer HUD's housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single preparation: the Consolidated Plan for Housing and Community Development. This document incorporates the plans for original consolidated programs, including Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG, currently Emergency Solutions Grant), and Housing Opportunities for Persons with AIDS (HOPWA), as well as additional program components that have been enacted since such as the Neighborhood Stabilization Program and the Housing Trust Fund.

As a part of the consolidated planning process (24 CFR 91), states and entitlement communities receiving such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. This certification has three parts and requires:

Conducting an Analysis of Impediments to Fair Housing Choice (AI);

- Taking appropriate actions to overcome the effects of any impediments identified through the analysis; and
- Maintaining records reflecting the analysis and actions taken.

HUD interprets these three certifying elements to entail:

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

On July 16, 2015, the Affirmatively Furthering Fair Housing (AFFH) Final Rule was published providing program participants with an approach to more effectively and efficiently incorporate into the planning process the duty of affirmatively furthering the policies of the Fair Housing Act. The purpose of this rule was to refine the prior analysis of impediments approach by replacing it with a fair housing assessment tool that would better inform HUD program participants' planning process and assist them in fulfilling the statutory obligation. Per the AFFH Rule, no Assessment of Fair Housing (AFH) will be due before the publication of the Assessment Tool applicable to the program participant. In addition, HUD must provide a minimum of nine (9) months after publication of the Assessment Tool when setting the deadline for submission of the AFH.

On Friday, January 5, 2018, HUD published Federal Notice Document 2018-00106, titled: Affirmatively Furthering Fair Housing: Extension of Deadline for Submission of Assessment of Fair Housing for Consolidated Plan Participants. This notice advises that HUD is extending the deadline for submission of an Assessment of Fair Housing (AFH) by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Per the guidance, the City of Laredo will continue to meet the obligation of affirmatively furthering fair housing by conducting an Analysis of Impediments to Fair Housing Choice.

Purpose of This Research

Thus, the purpose of the *2018 City of Laredo Analysis of Impediments to Fair Housing Choice* is to research, analyze and identify prospective impediments to fair housing choice and to suggest actions that the City can consider in working toward eliminating, overcoming or mitigating the identified impediments.

Community Participation Process

The City of Laredo Community Development Department and the Laredo Housing Authority (LHA) implemented a robust outreach strategy to inform residents of the Affirmatively Furthering Fair Housing process and to reaffirm its commitment to community engagement and outreach throughout its program activities. The City of Laredo Community Development Department and LHA sought to gather input from residents on housing an opportunity issues through a number of strategies to engage a range of community stakeholders and residents.

Community participation was received through several methods during the Analysis of Impediments process. Local organizations and members of the public provided input on Fair Housing through:

- Stakeholder Interviews
- Flvers
- Surveys

Stakeholder Interviews – Key groups of community stakeholders were identified, contacted, and interviewed as part of this Analysis. These stakeholders included representatives of nonprofit organizations (especially nonprofit housing developers), City of Laredo staff, fair housing advocates, and homeless service providers. Other stakeholders not belonging to any of these groups were occasionally interviewed as dictated by the course of research carried out for this Analysis.

A series of stakeholder interviews were conducted with organizations that are active in housing, community development, fair housing and public service activities in Laredo and the region. These interviews were held in person and via phone from November 20, 2017 through February 28, 2017. Stakeholders were identified by the City of Laredo and LHA staff and invited to participate in one-on-one interviews.

Interviews that could not be conducted in person were conducted over the phone. Interviews were held at the Community Development Office and other community based offices to ensure a time and place that was convenient. The goal of these interviews was to go beyond the quantitative data to gain perspective on the community development challenges and impediments to fair housing from a wide array of non-profit developers and service providers. Stakeholders were asked about the community assets, challenges, and needs across the City. These leaders were then asked to provide their input of fair housing challenges identified in the most recent Analysis of Impediments and actions the city could potentially take to address impediments moving forward.

Led by professional facilitators, the focus groups sought input from residents throughout the city, including Spanish-speaking residents and residents with disabilities. To recruit participants for these focus groups, the City used leaders from various stakeholder organizations to initially reach out to potential attendees.

LHA led the effort to encourage public housing residents to complete electronic and paper surveys to offer input. In an online or paper survey the respondent can only answer the questions asked by choosing from the answers offered. To get a deeper sense of the individual experiences of Laredo residents, the City and LHA conducted a focus group with public housing residents. The input was robust and plentiful and provided a deep discussion of some of the issues in public housing.

Stakeholder Surveys - a survey was designed to collect information from community stakeholders. The survey was developed in both English and Spanish as a majority of the population speaks Spanish as their first language. The survey was primarily advertised online through email distribution lists to all local stakeholders, city staff, housing authority staff, and citizens to garner input on Fair Housing issues. Survey Monkey, an online survey repository hosted the survey online.

City of Laredo and LHA recognized that not every citizen has access to a computer at home and that many citizens accessed computers at libraries and at neighborhood-based computer labs. To reach that population, the City and LHA developed fliers to advertise the survey and upcoming meetings. Additionally, the survey was also distributed onsite at the local health departments, the library, and other community centers in a paper format to engage those captive audiences.

The survey was designed to collect input from a broad spectrum of the community and received responses from City of Laredo residents and non-residents. The survey consisted of 32 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 135 responses to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey respondents are cited in this Analysis, it refers only to the percentage of respondents to the question being discussed and may not be a percentage of the full 135 survey respondents. Surveys were received from November 21, 2017 to February 28, 2018. Paper surveys received were manually entered by the Survey Administrator into SurveyMonkey for tabulation and analysis. To prevent "ballot stuffing", the Survey Monkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists.

Public Meetings – Four public meetings were held to provide a forum for City of Laredo residents and other interested parties to contribute to this Analysis. These meetings were held on Monday, November 20, at 2:00pm and 5:00pm at the Laredo Public Library, at

11:00am at the Laredo Housing Authority, and at 9:00am at the Haynes Recreation Center providing a variety of options for residents to attend and offer input.

These meetings were advertised via flyers distributed by the City of Laredo using its various mailing distribution lists. Local libraries and nonprofits receiving the posters were asked to print and post or distribute them as appropriate. The format of these meetings ranged from small-group roundtable discussions to moderated forums. Notes were taken of the public comments at all meetings.

Assessment of Past Goals, Actions, Strategies

The City completed an Analysis of Impediment to Fair Housing Choice in which the City identified impediments to fair housing. The City's Community Development Department has acted on these impediments under previous consolidated plans.

Impediment 1:

The City should educate and support neighborhood housing associations or groups within developments that foster compliance with the City's codes and ordinances which safeguard the health, safety, and availability of housing choices to neighborhood residents.

Status:

The City of Laredo is committed to collaborating with housing organizations and developers to explore strategies to address housing barriers as they may be identified. The City will continue to pursue partnerships, locate additional funding sources, and strategize on new ways to promote the development of affordable housing through private and public partnerships.

Impediment 2:

Barriers to housing for large low and moderate-income families exist because of housing units more than 3 bedrooms are limited in the housing stock. New construction of homes with 4 or more bedrooms is not affordable in the real-estate market. Multifamily and single-family units available to large families are limited compared to small families.

Status:

The City of Laredo formed Laredo Municipal Housing Corporation to provide rental housing units of 2, 3, and 4 bedrooms at fair market rent. Laredo Municipal Housing maintains and manages three housing developments, the Jose A. Flores Apartment, the Tomas Flores Apartment, and the Downtown Elderly Apartments for a total of 213 rental units ranging from 2-4-bedroom units. LMH also manages an additional 280 units through the City of Laredo's Airport Noise Abatement Program.

The City is making every effort to maintain the availability of affordable housing through the recent implementation of Neighborhood Empowerment Zone (NEZ) within areas of decline in downtown and central Laredo. This program promotes inner city redevelopment, and if successful will be expanded to include additional neighborhoods.

Impediment 3:

There is some evidence of familial status being considered in the rental of housing units during the time when the economy is at its best. The decrease in economy and the increase in vacant rental housing has reduced the number of landlords who were discriminating based on familial status.

Status:

The City of Laredo adopted a Fair Housing Ordinance on October 1, 1974, that provided for the right of the individual to provide himself and his family a dwelling, including the financing thereof, regardless of race, color, religion, or national origin. The ordinance was amended in 1978 to include protect rights based on sex, age, and physical handicap. Again in 1990, the ordinance was further amended to protect fair housing rights based on familial status. The ordinance further describes the procedure taken by any person who has or thinks he will be discriminated against. The ordinance further describes the investigation process, committee hearing, certification of City Attorney, legal proceedings and the city's cooperation with the Secretary of Housing and Urban Development.

The City also consults with local housing agencies when developing its Consolidated Plan on the use of HOME and CDBG funding.

Demographic Overview

Laredo is the county seat of Webb County, Texas, and located on the north bank of the Rio Grande in South Texas, across from Nuevo Laredo, Tamaulipas, Mexico. The city is one of Texas most populous cities and is the third-most populated on the Mexican border.

The demographics throughout the city has remained consistent over time as the city of Laredo has experienced only a 2% increase in the Hispanic population from 1990 to 2010 and 40% decrease in White populations. The African American populations in Laredo has grown slightly from 1990 to 2010, representing less than 1% of the total population. Since 1990, Hispanic residents have remained the majority population in the city of Laredo. Demographic patterns suggest that white and black, non-Hispanic residents are choosing to live outside the city of Laredo.

Throughout the region, the total population grew approximately 88% from 1990 to 2010. The Hispanic population saw the largest growth throughout the region for all ethnic groups in the region, increasing from 125,041 in 1990 to 239,653 in 2010. A corresponding higher level of growth occurred within the city of Laredo, as the Hispanic population grew from 122,258 to 222,412.

The majority of foreign born residents in 2010 were from Mexico and Honduras, representative of the local immigrant and refugee community. Although still a small segment of the population, residents with limited English proficiency primarily spoke Spanish, Korean, and Tagalog (Filipino language).

On a regional level, approximately 29% of residents are impacted by disabilities. Individuals report ambulatory difficulties at the highest rate (7.1%) followed by cognitively difficulty (6.2%) and independent living difficulty (4.9%). The two largest population groups by age of residents in Laredo are between 18 and 65 and 18 and under. It is anticipated that these two cohorts will drive trends in housing market demand.

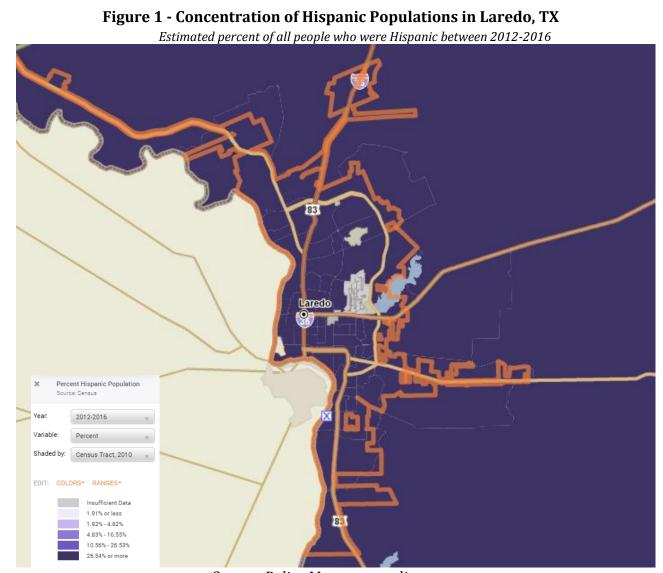
The following section reports demographic and population data per HUD-provided data, also available in subsequent sections in HUD Tables 1 and 2.

Race and Ethnicity - Demographic Patterns

(Laredo, TX CDBG, HOME, ESG) Jurisdiction

- Hispanics were the most populous racial/ethnic group in the city of Laredo (95.74%), followed by white, non-Hispanic population (3.32%) in the 2010 Census.
- All other racial/ethnic groups, which comprise, Black, non-Hispanic, Asian or Pacific Islander, non-Hispanic, Native American, non-Hispanic collectively account for less than 1% (.79%) in the 2010 Census.
- There was an increase of Hispanic residents from 122,258 to 222,412, an increase of 100,154 (82%).

- Blacks experienced a population increase from 47 to 496, an increase of 449 residents (955%)
- The white population also increased from 7,216 to 7,823, an increase of 607 residents (8.4%)
- Asian-Pacific Islanders population increased from 374 to 1,423, an increase of 1,049 residents (280%)
- Native American residents increased from 29 to 126, an increase of 97 residents or (334%)



Source: Policy Map, www.policymap

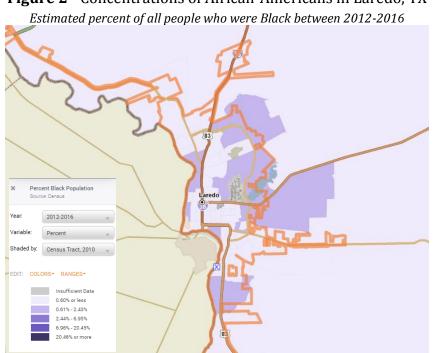
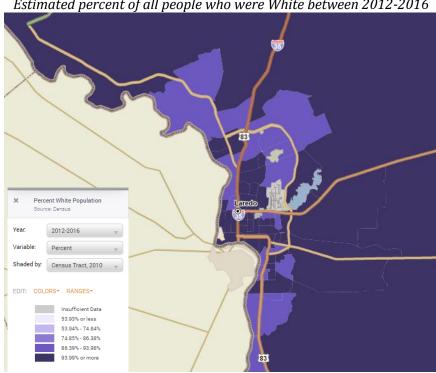


Figure 2 - Concentrations of African-Americans in Laredo, TX

Source: Policy Map, www.policymap



Source: Policy Map, www.policymap

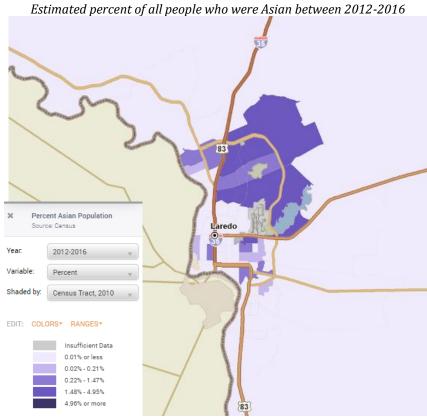


Figure 4 - Concentrations of Asians in Laredo, TX

Source: Policy Map, www.policymap

(Laredo, TX) Region

- The Laredo Region is predominantly Hispanic, which comprises 95.74%. White comprises 3.33% of the population and Black, non-Hispanic, comprises 19%.
- All other racial/ethnic groups, (Asian or Pacific Islander, non-Hispanic, Native American, non-Hispanic) collectively comprise 0.57% of the Laredo TX, region.
- White population increased in the region from 7,399 to 8,345, which is an increase of 946 (12%).
- Black population increased 48 to 554, an increase of 506 residents or (1,054%).
- The Hispanic population also increased from 125,041to 239,653, an increase of 114,612 residents (91%).
- Asian/Pacific Islander population increased from 376 to 1,440, which is an increase of 1,064 residents (282%)
- Native American population also increased from 29 to 148, an increase of 119 residents (410%).

Race and Ethnicity - Demographic Trends

(Laredo, TX CDBG, HOME, ESG) Jurisdiction

- The population in Laredo is predominately Hispanic, with 95% of the population identifying as Hispanic in the 2010 Census.
- From 1990 to 2010, the White population increased by 607 residents but decreased 1% in the overall percentage of the population in Laredo.
- Of all the racial and ethnic groups, the Black population experienced the most significant population increase (955%) between 1990 and 2010.
- The largest increase took place between 2000 and 2010 where the Hispanic population increased 33% from 168,743 to 225,412.
- The Asian or Pacific Islander, non-Hispanic population also experienced significant population growth of 280% between 1990 and 2010. In 2010 there were 1,423 Asian or Pacific Islander, non-Hispanic residents in Laredo, TX.
- The Native American, non-Hispanic population is the least populous racial and ethnic group identified in Laredo in 2010.
- In 1990, there were 29 Native American residents, which comprised 0.02% of Laredo's population. Between 1990 and 2010 there was an overall population growth of 334%. The Native American, non-Hispanic population peaked in 2000 with a population of 164; however, population declined by 23% between 2000 and 2010, where the Native American, Non-Hispanic population was 126.

(Laredo, TX) Region

- White, non-Hispanic population increased 12% between 1990 and 2010 from 7,399 to 8,345.
- All other racial or ethnic groups experienced population growth between 1990 and 2010.
- The black, non-Hispanic population increased 1,054% between 1990 and 2010.
- Between 1990 and 2010, the Hispanic population increased 91%.
- Asian or Pacific Islander, non-Hispanic population grew 282% from 376 to 1,440 between 1990 and 2010.
- Native American non-Hispanic population grew 410% between 1990 and 2010.
 Population declined slightly between 2000 and 2010, from 178 to 148, a decline of 30 people.

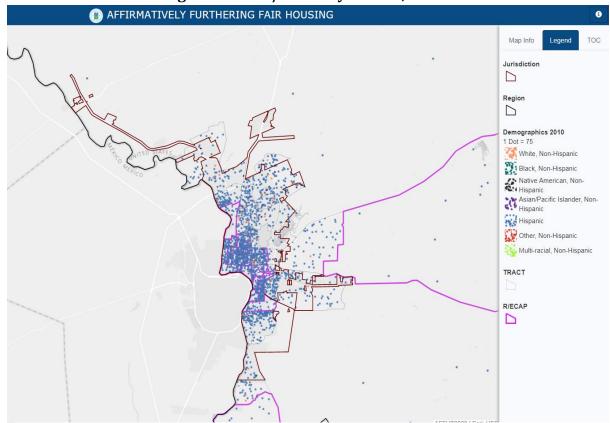


Figure 5 - Race/Ethnicity Laredo, Texas

Race/Ethnicity Laredo, TX. Source: HUD-provided map for AFH analysis

National Origin - Demographic Patterns (Laredo, TX CDBG, HOME, ESG) Jurisdiction

 Most foreign-born residents in Laredo originated from Mexico (62,315 residents), followed by Honduras and Philippines, with 761 and 453 residents respectively in 2010.

(Laredo, TX) Region

 Mexico, Honduras and Philippines were also the top three countries of origin for foreign residents within the Laredo region in 2010.

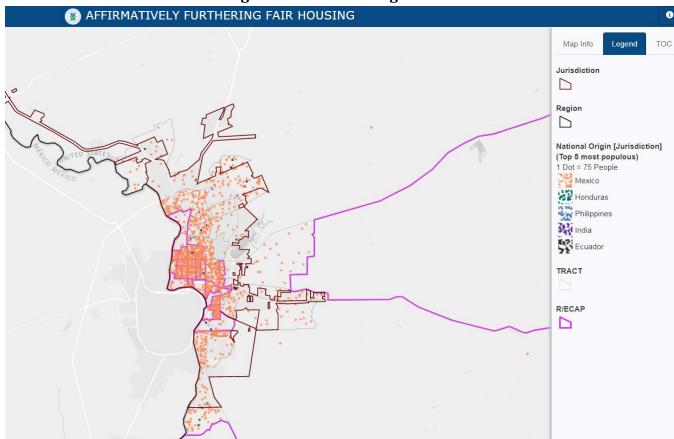
National Origin - Demographic Trends (Laredo, TX CDBG, HOME, ESG) Jurisdiction

• The number of foreign born residents increased between 1990 and 2010 from 32,422 to 66,205, or 104%.

As of 2010, foreign born residents comprised 28.04% of Laredo's population. The top countries of origin for foreign born residents in Laredo are: Mexico, (62,315 or 28.73%) Honduras (761 or 0.35%) and Philippines (453 or 0.21%).

(Laredo, TX) Region

- The proportion of foreign born residents doubled in the Laredo Region in the last two decades.
- In 1990, foreign born residents represented 25% (33,309) of population in the Laredo, TX Region, and increased 29.01% (56,026) by 2000.
- Another significant increase of foreign born residents took place between 2000 and 2010, which reflected an increase of 25.2% (14,137 residents).
- The top countries of origin for foreign born residents were: Mexico (66,774 or 29.10%), Honduras (769 or 0.34%) and Philippines (453 or 0.20%) in 2010.



Source: HUD-provided map for AFH analysis

Limited English Proficiency - Demographic Patterns

(Laredo, TX CDBG, HOME, ESG) Jurisdiction

■ The main languages spoken by people with limited English proficiency in Laredo were: Spanish (46.30%), Korean (0.04%) and Tagalog (0.04%) in 2010.

(Laredo, TX) Region

• The main languages spoken by people with limited English proficiency in the Laredo region were: Spanish (46.91%), Korean (0.04%) and Tagalog (0.04%) in 2010.

Limited English Proficiency - Demographic Trends

(Laredo, TX CDBG, HOME, ESG) Jurisdiction

- Population with limited English proficiency increased from 57,860 in 1990 to 101,262 in 2010 (75% increase).
- The main languages spoken by people with limited English proficiency in Laredo are: Spanish (46.30%), Korean (0.04%) and Tagalog (0.04%) in 2010.

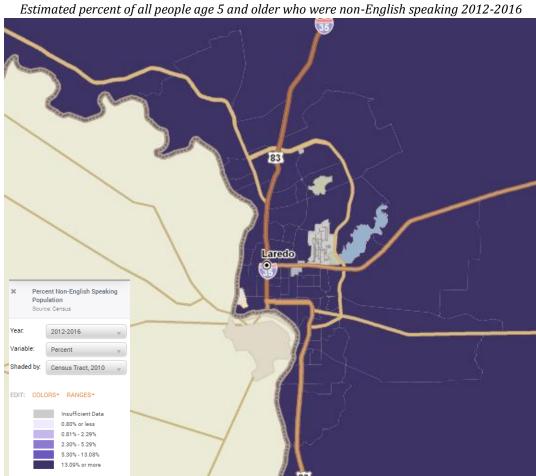


Figure 7 - Limited English Proficiency in Laredo, TX

Source: Policy Map, www.policymap

(Laredo, TX) Region

- Residents with limited English proficiency increased from 59,312 in 1990 to 107,997 in 2010; an 82% rise.
- The main languages spoken by people with limited English proficiency in the Laredo region were: Spanish (46.91%), Korean (0.04%) and Tagalog (0.04%) in 2010.

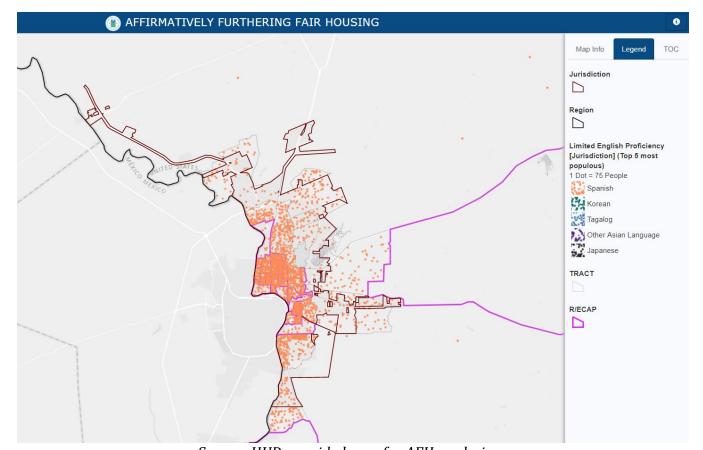


Figure 8 - 5 Most Commonly Used Languages

Source: HUD-provided map for AFH analysis

Disability Type - Demographic Patterns

(Laredo, TX CDBG, HOME, ESG) Jurisdiction

- Over 28% of residents reported having a disability in 2010.
- The most common disabilities in 2010 include ambulatory, which affects 6.97% of Laredo's residents, followed by cognitive and independent living difficulties. Less common disabilities include hearing difficulties, self-care and vision difficulties.

(Laredo, TX) Region

- Over 29% of residents reported having a disability in 2010.
- The most common disabilities in the Laredo region are similar to those of Laredo (ambulatory, cognitive and independent living difficulties).

Sex - Demographic Patterns

(Laredo, TX CDBG, HOME, ESG) Jurisdiction

• The male population comprised just under half of the population of Laredo (48.13%), while the female population comprised 51.87% in 2010.

(Laredo, TX) Region

• Comparable to Laredo, the male population comprised 48.54% of the population, while the female population comprised 51.46% in 2010.

Sex - Demographic Trends

(Laredo, TX CDBG, HOME, ESG) Jurisdiction

- The male population generally comprises just under half of the population of Laredo. In 1990, the proportion of male population was 47.95% or 62,453, which increased slightly in 2010 to 48.13% or 111,876.
- There was an increase in male population from 86,163 in 2000 to 111,876 in 2010.
- The female population generally comprises just over half of the population of Laredo.
- Female population increased from 67,795 in 1990 to 120,556 in 2010.

(Laredo, TX) Region

- Similar to Laredo, the male population comprises just under half of Laredo's population and slightly increased from 1990 to 2010.
- Despite increasing in number from 63,959 in 1990 to 93,039 in 2000, the proportion of females decreased slightly from 52% to 51.82% for the same period, and continued to decrease in 2010 to 51.46%.

Age - Demographic Patterns

(Laredo, TX CDBG, HOME, ESG) Jurisdiction

- The majority of the population in Laredo was between the ages of 18 to 64 (56.87%) in 2010.
- 35.16% of the population was under 18 and 7.97% 65 or older in 2010.

(Laredo, TX) Region

• Similar to Laredo, 56.99% of the population in the Laredo region in 2010 was between the ages of 18 to 64; 35.22% is 18 or under and 7.79% is 65 or older.

Age - Demographic Trends

(Laredo, TX CDBG, HOME, ESG) Jurisdiction

- The under 18 age cohort represent more than one third of the total population of Laredo. Between 1990 and 2010 the population under 18 increased 71% from 47,627 to 81,734.
- There was a nominal increase in the "18 to 64" cohort from 71,446 in 1990 to 99,323 in 2000, which then increased in 2010 to 132,184, a rise of 32,861.
- The 65+ age group increased between 1990 and 2000, from 10,174 residents to 14,259 and increased again in 2010 to 18,524, a gain of 8,350 residents.

(Laredo, TX) Region

- Population under 18 increased 79% from 48,994 in 1990 to 88,158 in 2010.
- "18 to 64" cohort increased from 55.49% of the population in 1990 to 56.99% in 2010.
- The 65+ age group also increased in population. This group had 10,310 residents in 1990, 14,831 in 2000 and 19,507 in 2010. There was an overall increase of 9,197 residents or 89%.

Families with Children - Demographic Patterns

(Laredo, TX CDBG, HOME, ESG) Jurisdiction

• In 2010, there were 30,635 families with children, which comprised 58.03% of Laredo's population.

(Laredo, TX) Region

• Within the Laredo region, there were 32,756 families with children, which, similar to Laredo, comprised 58.13% of the population in 2010.

Families with Children - Demographic Trends

(Laredo, TX CDBG, HOME, ESG) Jurisdiction

• Families with children steadily declined from 18,265 in 1990, to 14,247 in 2000 and increased to 30,634 in 2010; there was an overall decline of 21% between 1990 and 2000.

(Laredo, TX) Region

• Families with children also declined overall within the Laredo Region from 18,734 in 1990, to 15,125 in 2000 and significantly increased to 32,756 in 2010; a net decline of 19% between 1990 and 2000.

DEMOGRAPHICS

		(Laredo, TX CDBG, HOME, ESG) Jurisdiction						(Laredo, TX) Region								
	1990 T	1990 Trend 2000 Trend		20101	2010 Trend Curre		rrent	nt 1990 Trend		2000 Trend		2010 Trend		Current		
Race/Ethnicity	#	%	#	%	2010	%	#	%	#	%	#	%	2010	%	#	%
White, Non-Hispanic	7,216	5.54%	9,058	5.05%	7,823	3.32%	7,710	3.32%	7,399	5.55%	9,484	4.91%	8,345	3.33%	8,345	3.33%
Black, Non-Hispanic	47	0.04%	299	0.17%	496	0.21%	424	0.18%	48	0.04%	312	0.16%	554	0.22%	487	0.19%
Hispanic	122,258	93.84%	168,743	94.09%	225,412	95.74%	222,550	95.74%	125,041	93.82%	182,047	94.26%	239,653	95.74%	239,653	95.74%
Asian or Pacific Islander, Non-Hispanic	374	0.29%	835	0.47%	1,423	0.60%	1,317	0.57%	376	0.28%	860	0.45%	1,440	0.58%	1,331	0.53%
Native American, Non-Hispanic	29	0.02%	164	0.09%	126	0.05%	84	0.04%	29	0.02%	178	0.09%	148	0.06%	95	0.04%
National Origin																
Foreign-born	32,422	24.87%	51,368	28.57%	66,205	28.04%	65,643	27.80%	33,309	25.00%	56,026	29.01%	70,163	28.03%	70,303	28.09%
LEP																
Limited English Proficiency	57,860	44.39%	70,790	39.38%	101,262	42.89%	101,278	42.90%	59,312	44.52%	76,705	39.72%	107,997	43.15%	108,114	43.19%
Sex																
Male	62,453	47.95%	86,163	48.05%	111,876	48.13%	111,876	48.13%	63,959	48.00%	93,039	48.18%	121,488	48.54%	121,488	48.54%
Female	67,795	52.05%	93,150	51.95%	120,566	51.87%	120,566	51.87%	69,280	52.00%	100,078	51.82%	128,816	51.46%	128,816	51.46%
Age																
Under 18	47,627	36.57%	65,731	36.66%	81,734	35.16%	81,734	35.16%	48,994	36.77%	72,008	37.29%	88,158	35.22%	88,158	35.22%
18-64	72,446	55.62%	99,323	55.39%	132,184	56.87%	132,184	56.87%	73,935	55.49%	106,278	55.03%	142,639	56.99%	142,639	56.99%
65+	10,174	7.81%	14,259	7.95%	18,524	7.97%	18,524	7.97%	10,310	7.74%	14,831	7.68%	19,507	7.79%	19,507	7.79%
Family Type	·															
Families with children	18,265	62.72%	14,247	59.54%	30,634	58.03%	30,634	58.03%	18,734	63.00%	15,125	60.21%	32,756	58.13%	32,756	58.13%

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Source: AFFH Table 1 – Demographics: Decennial Census; ACS

DEMOGRAPHIC TRENDS

	1	TRENDS	-			
	(Laredo, TX CDBG,	HOME, ESG) Jurisdictio	(Laredo, TX) Region			
Race/Ethnicity	•	#	%	·	#	
White, Non-Hispanic		7,710	3.32%		8,345	3.33%
Black, Non-Hispanic		424	0.18%		487	0.19%
Hispanic		222,550	95.74%		239,653	95.74%
Asian or Pacific Islander, Non-Hispanic		1,317	0.57%		1,331	0.53%
Native American, Non-Hispanic		84	0.04%		95	0.04%
Two or More Races, Non-Hispanic		238	0.10%		263	0.11%
Other, Non-Hispanic		119	0.05%		130	0.05%
National Origin						
#1 country of origin	Mexico	62,315	28.73%	Mexico	66,774	29.10%
#2 country of origin	Honduras	761	0.35%	Honduras	769	0.34%
#3 country of origin	Philippines	453	0.21%	Philippines	453	0.20%
#4 country of origin	India	329	0.15%	India	329	0.14%
#5 country of origin	Ecuador	315	0.15%	Ecuador	315	0.14%
#6 country of origin	El Salvador	238	0.11%	El Salvador	241	0.11%
#7 country of origin	Guatemala	177	0.08%	Guatemala	207	0.09%
#8 country of origin	Korea	129	0.06%	Korea	129	0.06%
#9 country of origin	Cuba	94	0.04%	Cuba	101	0.04%
#10 country of origin	Nicaragua	84	0.04%	Nicaragua	94	0.04%
Limited English Proficiency (LEP) Languag	e					
#1 LEP Language	Spanish	100,417	46.30%	Spanish	107,653	46.91%
#2 LEP Language	Korean	91	0.04%	Korean	91	0.04%
#3 LEP Language	Tagalog	85	0.04%	Tagalog	85	0.04%
#4 LEP Language	Other Asian Language	65	0.03%	Other Asian Language	65	0.03%
#5 LEP Language	Japanese	63	0.03%	Japanese	63	0.03%
#6 LEP Language	Other Indic Language	43	0.02%	Other Indic Language	43	0.02%
#7 LEP Language	Hindi	41	0.02%	Hindi	41	0.02%
#8 LEP Language	Russian	24	0.01%	Russian	24	0.01%
#9 LEP Language	Chinese	14	0.01%	Chinese	14	0.01%
#10 LEP Language	Thai	12	0.01%	Thai	12	0.01%

Disability Type				
Hearing difficulty	7,959	3.70%	8,552	3.76%
Vision difficulty	7,745	3.60%	8,416	3.70%
Cognitive difficulty	13,014	6.06%	14,172	6.23%
Ambulatory difficulty	14,978	6.97%	16,235	7.14%
Self-care difficulty	7,168	3.34%	7,674	3.37%
Independent living difficulty	10,609	4.94%	11,296	4.97%
Sex				
Male	111,876	48.13%	121,488	48.54%
Female	120,566	51.87%	128,816	51.46%
Age				
Under 18	81,734	35.16%	88,158	35.22%
18-64	132,184	56.87%	142,639	56.99%
65+	18,524	7.97%	19,507	7.79%
Family Type				
Families with children	30,634	58.03%	32,756	58.13%

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Source: AFFH Table 2 - Demographic Trends: Decennial Census; ACS

Education

As a percentage of the population 25 years of age and older, Laredo's high school dropout rate is 14.2%, which is slightly below the college graduation rate of 14.7%. As outlined in the table below, nearly 14.2% of Laredo residents 25 or older did not complete high school. Twenty-nine percent graduated from high school, with approximately 14.7 percent going on to attend college.

Just over six percent of Laredo residents have earned an associate degree, with over 12 percent earning a bachelor's and just over 5 percent has earned a graduate, professional or doctorate degree. These educational attainment levels have increased since 2011, likely because of the significant increase in millennials in the city.

2016 EDUCATIONAL ATTAINMENT

Cubicat	Laredo city, Texas			
Subject	Total	Percent		
Population 25 years and over	141,289	100%		
Less than 9th grade	24,972	17.7%		
9th to 12th grade, no diploma	20,099	14.2%		
High school graduate (includes equivalency)	41,268	29.2%		
Some college, no degree	20,708	14.7%		
Associate's degree	9,583	6.8%		
Bachelor's degree	17,444	12.3%		
Graduate, Professional or Doctorate degree	7,215	5.1%		

Table 3: Source, US Census American Fact Finder, www.census.gov

Employment

In 2016 Laredo had approximately 101,929 residents in its labor force of whom approximately 97,451 were employed. The unemployment rate of 4.5 percent, was significantly reduced from 5.6 percent in 2015.

UNEMPLOYMENT RATES

2016	2015 2014		2013	2012
Estimate	stimate Estimate		Estimate	Estimate
4.5%	5.6%	6.3%	6.4%	5.1%

Table 4: Source, US Census American Fact Finder, www.census.gov

In Laredo, women had a lower unemployment rate than men with only 45,070 of females in the labor force as compared to 56,859 of males in the labor force.

Povertv

Despite years of job growth, and significant income growth in the past year, Laredo's poverty rate remains stubbornly high. Although it is slightly up from 30.4 percent in 2015, the poverty rate of 32.4 percent remains the highest among the nation's 10 largest cities.

POPULATION LIVING IN POVERTY

		Total Estimate	Below poverty level Estimate	Percent below poverty level Estimate
Population	2016	254,632	82,576	32.4%
for whom	2015	252,445	77,498	30.7%
poverty	2014	250,128	80,197	32.1%
status is	2013	245,305	75,368	30.7%
determined	2012	239,827	75,717	31.6%

Table 5: Source, US Census American Fact Finder, www.census.gov

2. Location of homeowners and renters in the jurisdiction and region, and describe trends over time.

The region has a noticeably lower homeownership rate than that of the city. Homeownership rates in the region are noticeably higher in the outer urban centers. Homeownership rates are declining in many areas of the city, but have remained somewhat constant overall, with little fluctuation from 2012 to 2016. The growth of owner-occupied units has occurred in the outermost suburbs of the region. Within the city, urban center has the highest percentage of renters which may be contributed to its location near the border.

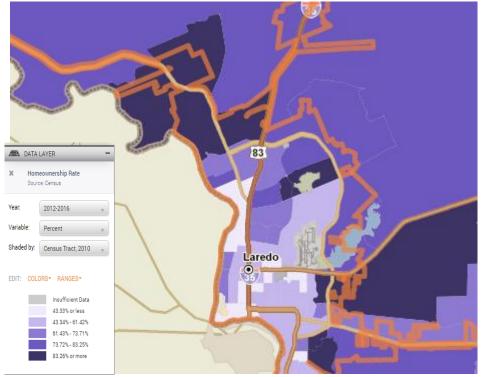
HOMEOWNERS AND RENTERS

	Laredo Region, Webb County, Texas								
	2016 2015 2014 2013 2012								
Total:	44,439	43,817	43,476	43,256	43,441				
Owner occupied	24,448	24,058	23,632	24,314	24,344				
Renter occupied	19,991	19,759	19,844	18,942	19,097				

	City of Laredo, Texas								
	2016 2015 2014 2013 2012								
Total:	67,651	66,308	65,014	64,012	63,596				
Owner occupied	42,439	41,378	40,199	40,450	40,005				
Renter occupied	25,212	24,930	24,815	23,562	23,591				

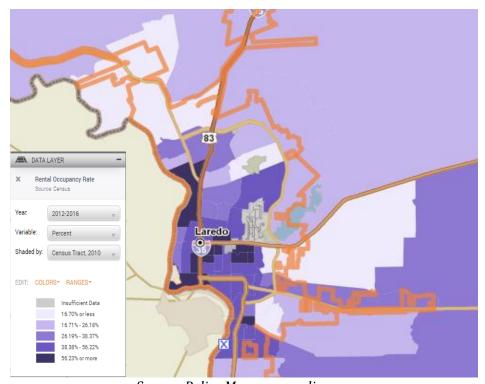
Table 6: Source, US Census American Fact Finder, www.census.gov

Figure 9 - Estimated percent of all households that own a home between 2012-2016



Source: Policy Map, www.policymap

Figure 10 - Estimated percent of all households that rent a home between 2012-2016



Map Variations | Map Themes |

Map Interest | Map Themes |

TAMAT

TAMAT

RECAP

Persent Households who are Owner: 0 430 % 1037 % 10 % 100

Figure 11 - Percent of Owner Households in the City of Laredo

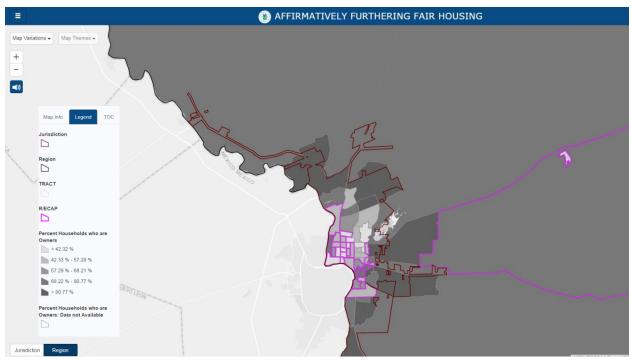


Figure 12 - Percent of Owner Households in the Laredo Region

General Issues

Segregation Analysis

Laredo is a majority minority city with approximately 95.4 percent of its population identifying as minority in 2016, according to Census ACS estimates. Laredo is one of the least ethnically diverse cities in the United States. However, when comparing economic diversity, household diversity, and social class diversity, the City of Laredo is much more diverse. The following will provide a more detailed analysis of the degree of segregation and integration patterns and trends at the regional, city and neighborhood level.

Segregation Levels in the Jurisdiction and Region

To describe levels of segregation in the jurisdiction and region HUD provides a dissimilarity index. This index measures the degree to which two groups are evenly distributed across a geographic area and is a commonly used tool for assessing residential segregation between two groups. The dissimilarity index provides values ranging from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured. Generally, dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

Dissimilarity Index Value Level of Segregation

	Level of Segregation	
Dissimilarity	0-39	Low Segregation
Index Value (0-	40-54	Moderate Segregation
100)	55-100	High Segregation

Source: Table 7: Dissimilarity Index Value Level of Segregation

The dissimilarity index below shows a low level of segregation for Laredo and the region. The highest levels, in order, exist between Asian or Pacific-Islander/White and Non-White/White residents in the City and the region. Asian or Pacific-Islander/White is the only comparison group that demonstrates a moderate level of segregation. Overall, the dissimilarity index for all racial/ ethnic groups is lower for the region than the city in 1990, 2000 and 2010.

Racial/Ethnic Dissimilarity Trends

	(Lar	(Laredo, TX CDBG, HOME, ESG) Jurisdiction					TX) Regio	n
Racial/Ethnic Dissimilarity Index	1990 2000 2010 Current Trend Trend			1990 Trend	2000 Trend	2010 Trend	Current	
Non-White/White	33.76	27.65	30.20	33.02	33.52	27.80	30.35	33.79
Black/White	47.17	28.19	28.49	38.93	47.43	28.41	28.90	39.39
Hispanic/White	33.98	27.93	30.54	33.33	33.73	28.06	30.69	34.10
Asian or Pacific Islander/White	35.83	30.22	34.63	39.19	36.25	30.83	34.99	41.61

Table 8: Racial/Ethnic Dissimilarity Trends, HUD AFFH Data

Areas with Relatively High Segregation and integration by Race/Ethnicity, National Origin, or LEP Group

Race/Ethnicity

As illustrated in the HUD Race/Ethnicity map below the high degree of segregation of Hispanics is striking, both within the region and the city. The greater Laredo region is predominately Hispanic as well. There are no identifiable concentrations of White and Black populations throughout the city or the Laredo region.

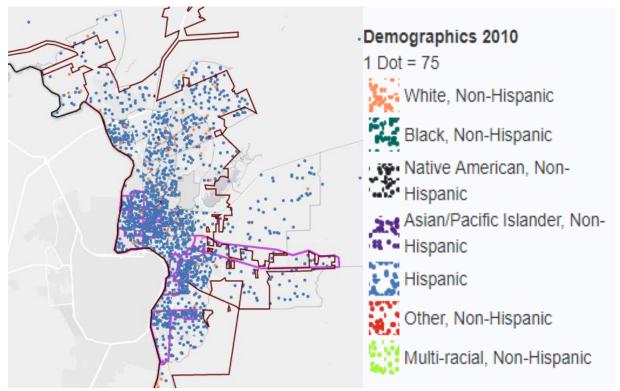
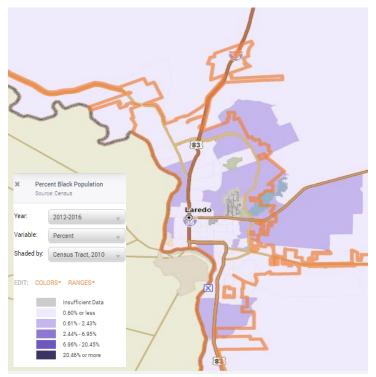


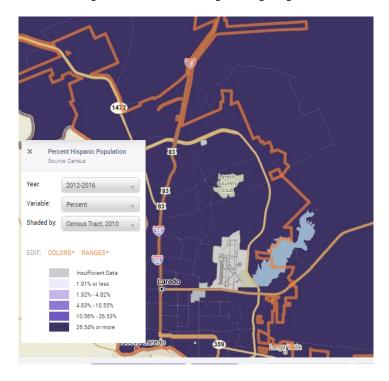
Figure 13 - Race/Ethnicity Concentrations

Figure 14 - Estimated percent of all people who were Black between 2012-2016 $\,$



Source: Policy Map, www.policymap

Figure 15 - Estimated percent of all Hispanic people between 2012-2016



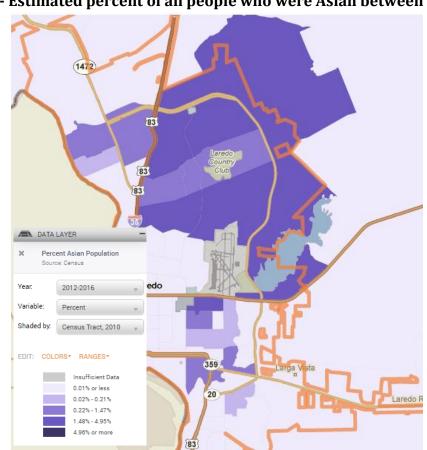
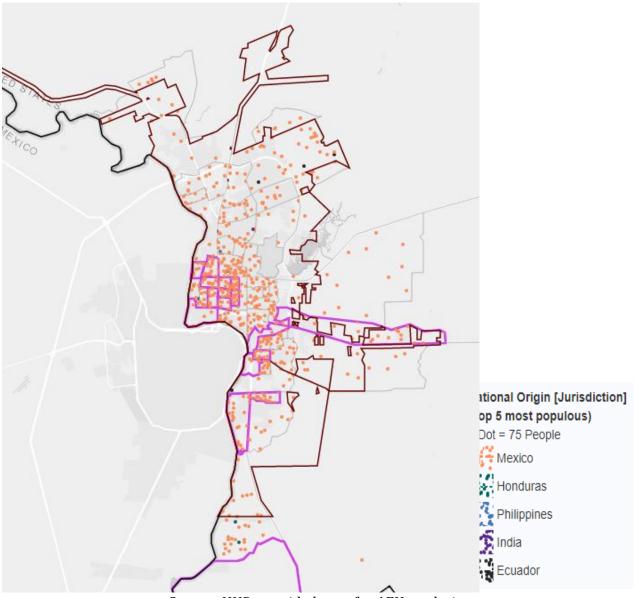


Figure 16 - Estimated percent of all people who were Asian between 2012-2016

National Origin

Foreign-born residents constitute a large percentage of the total regional population as illustrated in the map on the next page. In the city, the concentration of foreign-born individuals is dispersed throughout and includes populations from Mexican, Honduras, Philippines, India, and Ecuador. The majority concentration foreign-born individuals are from Mexico in the city and the region.

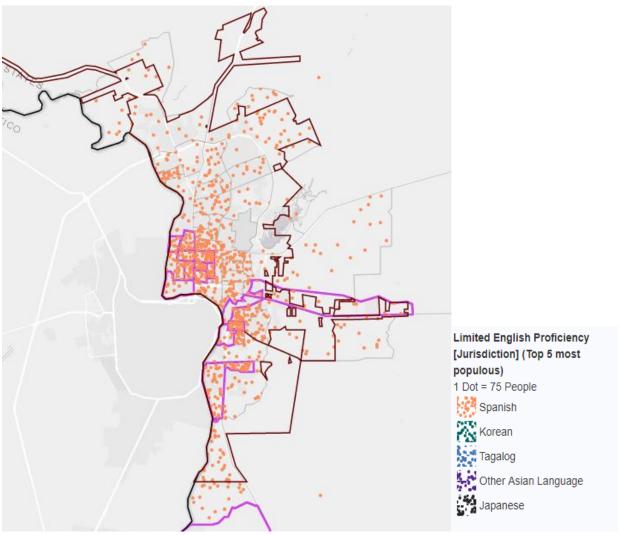
Figure 17 - National Origin Concentrations



Limited English Proficiency (LEP)

As illustrated in the map below Spanish, Korean, Tagalog, Other Asian Languages, and Japanese represent the top three groups in the city and the region. Spanish represents the highest percentage in the city and region by a wide margin. The highest concentrations of Spanish-speaking individuals are in urban center of Laredo, closest to the border.

Figure 18 -Limited English Proficiency (LEP)



Changes in Segregation Levels over Time (since 1990).

The segregation levels between non-White/White, Black/White, and Hispanic/White declined from 1990 to 2000 and increased from 2000 to 2010 in the city and the region. However, generally the decline in the region was less than that in the city. For example, the segregation level between Black/White dropped from 47.17 to 28.49 in the city and from 47.43 to 28.90 in the region. The biggest decline for all three of these groups occurred from 1990 to 2000. The drop in levels for these three groups was very slight from 2000 to 2010 in both the city and the region. There was only a slight change in the level of Hispanic/White segregation in the region from 2000-2010.

The segregation level between Asian or Pacific Islander/White decreased very slightly in the city from 1990 to 2010. The level for this group also decreased from 35.83 to 34.63 in the city and from 36.25 to 34.99 in the region from 2000 to 2010.

Racial/Ethnic Dissimilarity Trends

	(Lared	(L	aredo, T	ΓX) Regi	on			
Racial/Ethnic Dissimilarity Index	dex Trend Trend Trend Current				1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	33.76	27.65	30.20	33.02	33.52	27.80	30.35	33.79
Black/White	47.17	28.19	28.49	38.93	47.43	28.41	28.90	39.39
Hispanic/White	33.98	27.93	30.54	33.33	33.73	28.06	30.69	34.10
Asian or Pacific Islander/White	35.83	30.22	34.63	39.19	36.25	30.83	34.99	41.61

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

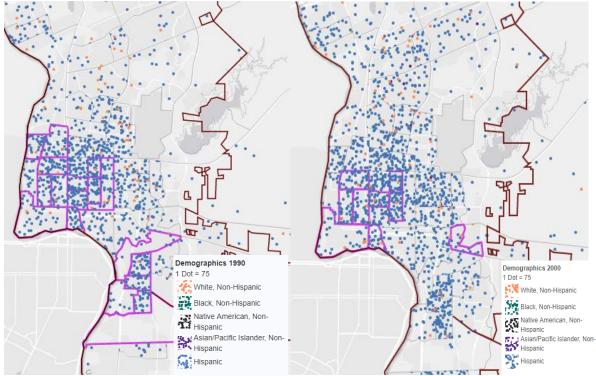
Table 9: Source: AFFH Table 8-Racial/Ethnic Dissimilarity Trends

Although the dissimilarity index shows that the low level of segregation between non-White/White, Hispanic/White and Asian or Pacific Islander/White, decreased some between 1990 and 2000, the following two HUD maps illustrate that on a spatial level there remains higher levels of segregation between Asian or Pacific Islander/White and Blacks and Whites – the region remains predominantly Hispanic. In addition, within the city and the region there is still a high degree of segregation. The population of the city and the region has remained consistent since 1990 with the rapid growth of the Hispanic population.

Racially and Ethnically Concentrated Areas of Poverty Comparisons

Figure 19 - 1990 R/ECAP

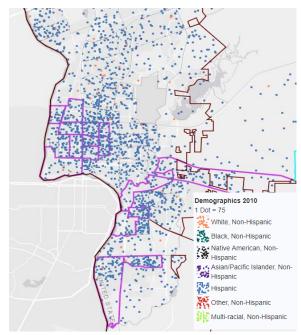
Figure 20 - 2000 R/ECAP



Source: HUD-provided map for AFH analysis

Source: HUD-provided map for AFH analysis

Figure 21 - 2010 R/ECAP



Segregated or Integrated Areas for the Location of Owner and Renter Occupied Housing

As noted earlier, both the City of Laredo and the region have moderate to low dissimilarity indices, demonstrating a low level of segregation. As a result, it can be assumed that much of the housing described below – both owner and renter occupied housing – is located in significantly segregated areas.

The following maps provide a spatial representation rental of and homeownership levels among the populations. Rental levels are highest in the R/ECAP areas in both the city and the region and are lower outside the R/ECAP areas in the city. The maps also show that the region has a noticeably higher homeownership rate than that of the city. Rates begin to rise immediately outside of the city. Homeownership rates in the region are noticeably lower in the outer urban centers. The demographic section indicates that while Homeownership rates are declining in some areas, region wide they have remained somewhat constant overall with little fluctuation from 2000 to 2010. The growth that has occurred is generally seen in the outermost suburbs. Within the city, rental rates are generally the highest near the the with urban border. center experiencing particularly high levels.

Figure 22 - Percent Households who are Renters with R/ECAP Overlay

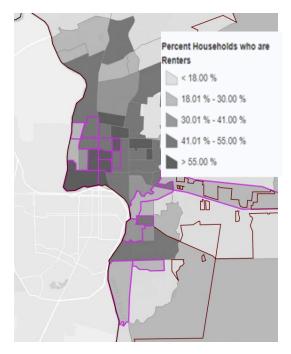
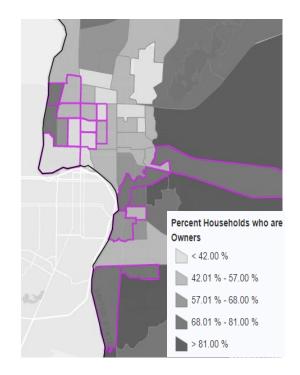


Figure 23 - Percent Households who are Owners with R/ECAP Overlay



The following maps reflect high concentration of renters located in the urban center of the City of Laredo and the region near Chicago Street, Sherman Street, Park Street and Washington Street, while the highest percentage of owner-occupied units are located at the intersection of E. Del Mar Blvd, McPherson Avenue and Bob Bullock Loop.

Figure 24 -Percent of Renter Occupied Housing, 2010

Arturo Cortes
Villada
Nuevo Latero
Victoria

Renter Occupied Housing

49 94%

9 94-26.82%

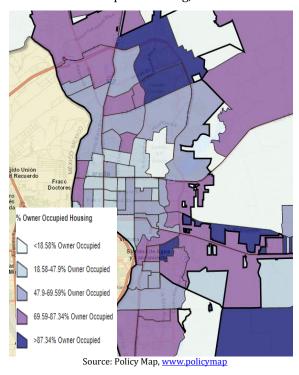
26.82-46.79%

46.79-73.14%

>73.14%

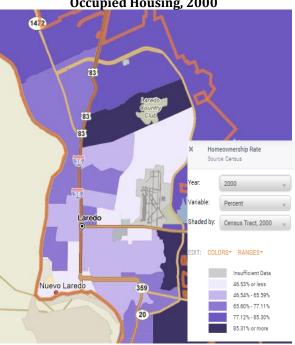
Priorice: Policy Map, www.policymap

Figure 25 - Percent of Owner Occupied Housing, 2000



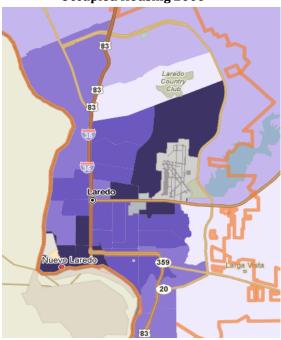
In 2000, the location of housing in the City of Laredo and the region reflected the highest percentages (over 77%) of home ownership outside of the urban center and pockets of high rental occupancy (over 34%) located in both the urban center near the border and outskirts of the city.

Figure 26 - Percent of Renter Occupied Housing, 2000



Source: Policy Map, www.policymap

Figure 27 - Percent of Owner Occupied Housing 2000



Demographic trends or practices that could lead to higher segregation

The significant level of segregation that exists today in both the city and Region began decades ago.

"The residential character of Laredo is consistent with the status oriented, high density Latin American settlement pattern. Those families of the highest social status located their homes in close proximity to the plaza, while others of lesser status located on the periphery. In the second half of the 19th century, the elite residential neighborhood centered around San Agustín Plaza. San Agustín Church, situated on the east side of the plaza, was founded in 1767, and the present building was constructed in 1860-1872. Prominent ranchers and settlers who lived adjacent to the plaza were the García, Levendecker, Martin, Vidaurri, Benavides, and Ramon families. Laredo has emerged as the principal port of entrv into Mexico". http://www.cityoflaredo.com/history.html

The lending disparities that persist today—as described in the next section—further limit mobility for Laredo residents. However, other factors also limit minority mobility. Poor schools leave young residents unprepared to access higher-paying jobs, which leave them financially unable to move to a higher opportunity neighborhood. Multiple factors affecting access to opportunity are addressed throughout this report.

The lack of affordable housing is a major concern for the City of Laredo and the region. While residents have noted the lack of affordable housing opportunities and difficulty low income families have in qualifying for safe and decent housing. Other factors, such as an increased investment in transportation for residents to improve the frequency, reliability and perceptions for public transit was noted as a concern limiting housing mobility. The lack of adequate, affordable transportation can affect individual's ability to maintain gainful employment, which may result in housing mobility.

City zoning and land use regulations can contribute to various types of segregation because they separate single-family dwellings from two-family and multi-family dwellings so thoroughly. As single-family dwellings tend to be more expensive than other types of housing options, large areas of single-family zoned neighborhoods tend to be segregated by income, meaning that there are areas of significant concentrated poverty. The following table shows the amounts of land area dedicated to each of the residential zoning districts:

Residential Zoning Districts

RESIDENTIAL DISTRICTS								
R-1	R- 1A	R-1MH	R-2	R-3	RSM	RS	RO	USES
X	X	X	X	X	X	X	X	Single Family Detached
	X	X	X	X	X	X	X	Single Family Zero Lot Line
	X	X	X	X	X	X	X	Single Family Townhouse
		X		X				Single Family Manufactured Home
			X	X			X	Two Family (Duplex)
			X	X	X		X	Three Family (Triplex)
			X	X	X			Four Family (Quadraplex)
			X	X	X		X	Multi-Family
			X		X		X	Condominiums
			S	S	X		X	Townhouse
	X- Permitted S- Special Land Use							

Table 10: Source: City of Laredo-Residential Zoning Districts

The urban center of the City of Laredo is primarily commercial along the main corridors with single family and multi-family neighborhoods in-between. The zoning ordinance defines multifamily housing as any housing that contains three (3) or more dwelling units. Multifamily dwellings are allowed by right in only four districts, including R-2, R-3, RSM, and RO. There are no requirements or incentives for affordable housing units within the zoning ordinance. The City does not appear to waive any zoning requirements for affordable housing.

Mortgages and Lending Trends

Lending disparities are a contributing factor in several types of barriers to fair housing: segregation, disparities in access to opportunity, and disproportionate housing needs. This analysis examined application, approval and denial data for home purchase mortgage loans to determine whether lending activities differed in neighborhoods with varying income compositions. The data used was collected in 2014-15 under the Home Mortgage Disclosure Act (HMDA), which captures the activities of most institutional lenders.

There were notable differences in mortgage application loan types (prime vs. government-backed) between areas with different economic compositions. Disparities in loan type are important because while government-backed mortgages fill a need, particularly after the collapse of the subprime lending market, these loans are more expensive and more restrictive than other loan types. Areas that have a preponderance of these loans therefore are spending more aggregate income on housing and have less access to certain refinancing

or mortgage assistance tools, such as Homeowners Emergency Mortgage Assistance Program (HEMAP), which is a loan program to prevent foreclosure. These conditions can reinforce problematic housing patterns. The share of home purchase mortgages that used government loans was highest in Census Tracts 17.22, 16.02, 17.11, 17.12, 17.13 and 17.15. A disparity also exists in the location in which householders earning less than 50% of the MSA Median Income and householders earning 50% - 80% have originated loans. Over 14.01% of households at 50% MSA have loan originations located in R/ECAPs.

17.13 177.122 17.20 16.02 17.09 9800 16.01 Laredo 18.16 19 Nuevo Laredo

Figure 28 - Number of home loans that were insured by the government in 2015

Figure 29 - Percent of loans where the borrower's income is less than 50% of MSA Median Income in 2015

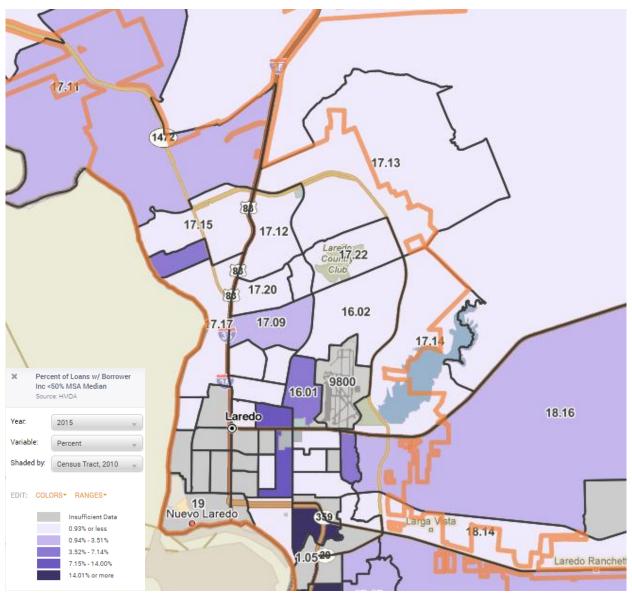
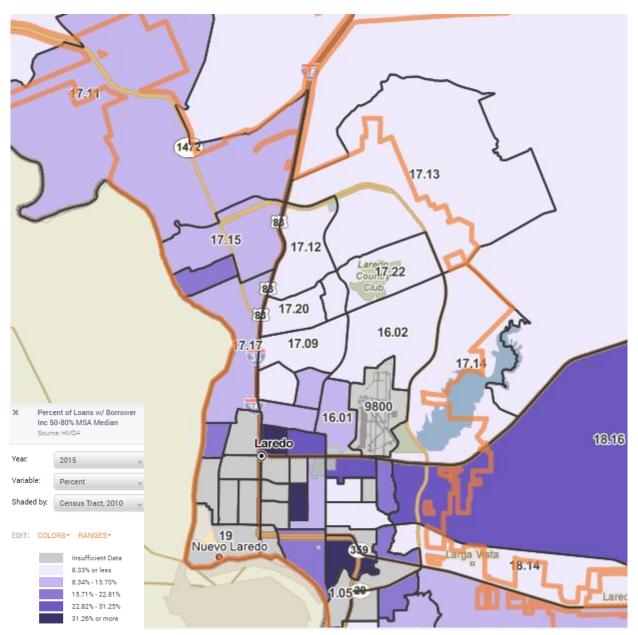


Figure 30 - Percent of loans where the borrower's income is between 50% and 80% of MSA Median Income in 2015



Contributing Factors of Segregation

Lack of community revitalization strategies

Stakeholders emphasized the importance of city and neighborhood plans that engage community residents as critical to ensuring all residents have access to housing and opportunities. However, the need for revitalization activities is greater than the existing strategies and activities. Community development organizations are facing a lack of resources and would benefit from increased cooperation throughout the community.

Lack of private investments in specific neighborhoods

The urban areas of the city continue to be underserved by services and businesses. In addition to a lack of services such as grocery stores and banks. These areas have also fallen into disrepair, increasing the amount of investment for renovation and revitalization activities. Stakeholders and residents expressed the need for a range of private investments -- mixed-income/mixed-use developments, grocery stores, banks, health care facilities and others – in low-opportunity areas. Lack of these amenities contributes to overall market conditions and may impact segregation patterns.

Lack of public investments in specific neighborhoods, including services or amenities

A range of public amenities and services— parks, high-performing schools, libraries, recreation centers, lighting, sidewalks, trash collection — are important factors in stabilizing neighborhoods and ensuring equitable access. Many public facilities are in need of repairs and/or many communities lack this range of public amenities. Lack of high quality public amenities may impact segregation patterns.

Location and type of affordable housing

Households who have disproportionately lower educational attainment and those who may not be U.S. citizens tend to reside in subsidized housing which are in areas of disinvestment but are only affordable options. This impacts segregation patterns. Affordable housing units are primarily available in R/ECAP and segregated areas of the city with less access to opportunities. Existing public housing units, which are primarily located in these areas are in need of major renovations and improvements.

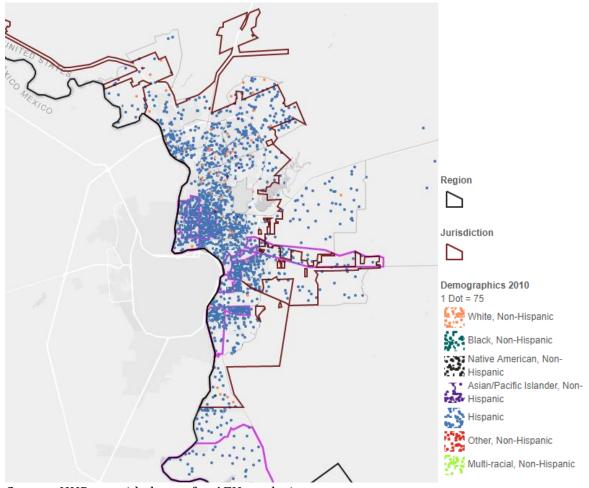
Loss of affordable housing

Meeting participants raised concern about growth pressures continuing to increase taxes and land costs. Additionally, the stock of lower priced single family homes continues to decrease as land values create economic pressure for new infill.

R/ECAPs or groupings of R/ECAP tracts in Laredo

HUD defines a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as a census tract where: (1) the non-White population comprises 50 percent or more of the total population and (2), the percentage of individuals living in households with incomes below the poverty rate is either (a) 40 percent or above or (b) three times the average poverty rate for the metropolitan area, whichever is lower.

Figure 31 - Race/Ethnicity



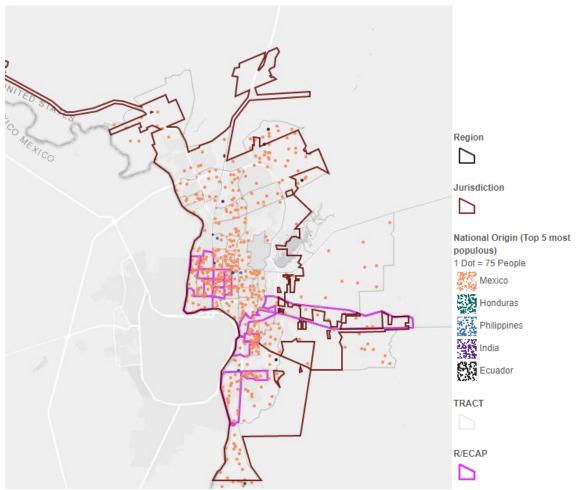
Source: HUD-provided map for AFH analysis

Racially and ethnically concentrated areas of poverty (R/ECAPs) occupy a significant coverage area within the city limits. While much of Northeast, Northeast, and West region do not contain R/ECAPs. There are sizeable designations are seen in the urban center of Laredo near the border.

National Origin

A sizable population of foreign born individuals resides in R/ECAPs in the city of Laredo and in the region. The most prevalent country of origin of the population living in R/ECAPs is Mexico R/ECAP residents, followed by Honduras R/ECAP residents.

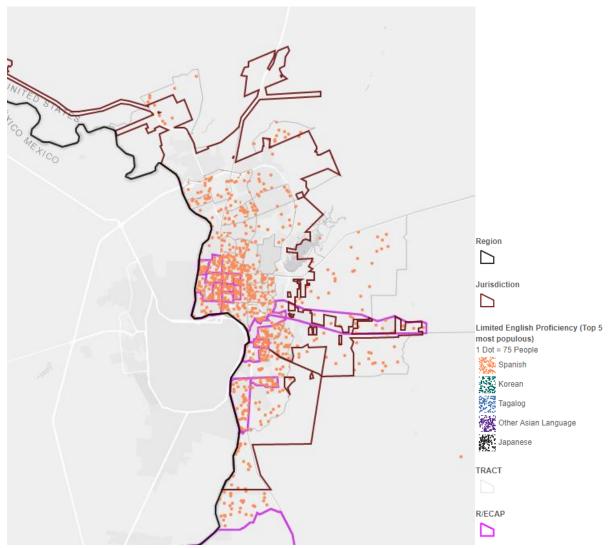
Figure 32 - National Origin



Limited English Proficiency (LEP)

Limited English Proficiency is also very extensive within R/ECAPs. There are very substantial concentrations of those with limited English speaking proficiency in the urban center of the City of Laredo and within the region as well. As noted earlier, a considerable Hispanic population resides here. Spanish is widely spoken.

Figure 33 - Limited English Proficiency (LEP)



R/ECAP Population by Race/Ethnicity in Laredo and Region

	CDBG	edo, TX , HOME, risdiction	(Laredo, TX) Region		
R/ECAP Race/Ethnicity	#	%	#	%	
Total Population in R/ECAPs	81,505	-	86,519	-	
White, Non-Hispanic	1,608	1.97%	1,702	1.97%	
Black, Non-Hispanic	81	0.10%	81	0.09%	
Hispanic	79,610	97.67%	84,517	97.69%	
Asian or Pacific Islander, Non- Hispanic	94	0.12%	95	0.11%	
Native American, Non-Hispanic	28	0.03%	33	0.04%	
Other, Non-Hispanic	29	0.04%	32	0.04%	

Table 11: Source: HUD-provided table for AFH analysis

Over 97 percent of those living in R/ECAPs reside in the city of Laredo and the region and are Hispanic. Very few R/ECAPs are found in the region. Those that do exist are found in the eastern and southern part of the region. Each of these locales contains highly concentrated population, particularly when compared to other outlying areas of the region.

Percentages of White, Black, and Asian populations are fairly consistent when comparing race/ethnicity within R/ECAPs in the jurisdiction and region. For example, Whites constitute approximately 1.97 percent of those living in R/ECAPs in both cases. Similarly, Blacks represent 10 percent and 9 percent of those living in R/ECAPs in both the city and region, respectively.

There are a disproportionate number of Hispanics individuals that reside in R/ECAPs, while only 1.9 percent of Laredo's R/ECAP are white, non-Hispanic and less than a tenth of Black and Asians reside in R/ECAPs. The R/ECAP populations in the Laredo region are representative of the regional demographics. The region surrounding Laredo is mostly Hispanic, approximately 97.69 percent. The following maps show R/ECAPs in Laredo in relation to concentrations of the different races/ ethnicities referenced above.

Figure 34 - White Populations in R/ECAPs

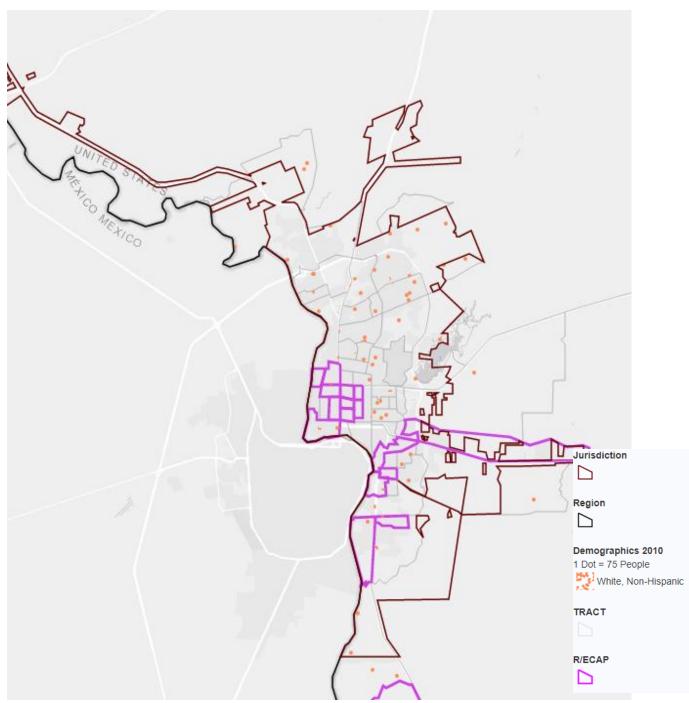


Figure 35 - Black Populations in R/ECAPs

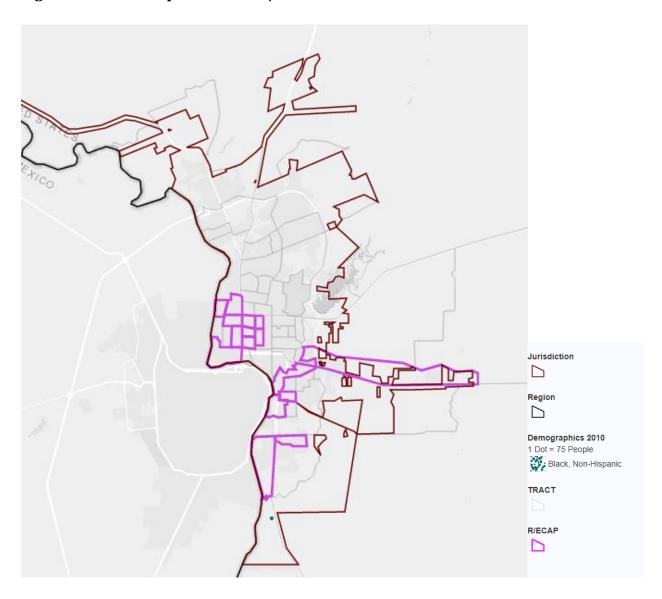
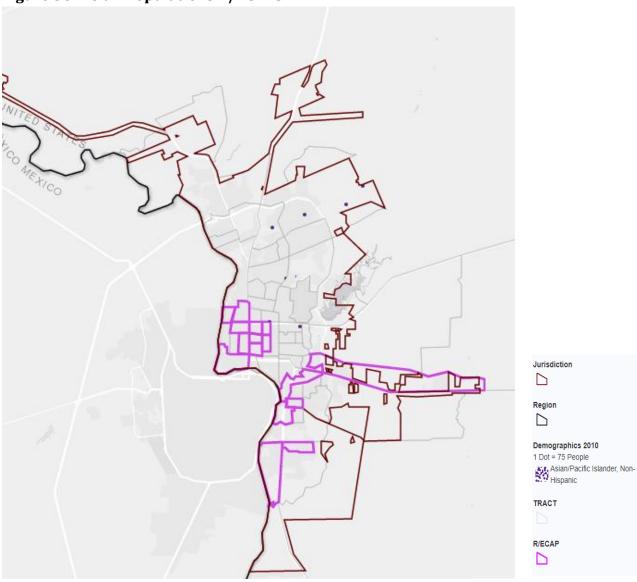


Figure 36 -Asian Populations R/ECAPS



National Origin

R/ECAP Population by National Origin in Laredo and Region

Ity Zeiti Topuide	(Laredo, T									
	ESG) Jurisdiction			(Laredo	o, TX) Re	gion				
R/ECAP National Origin										
Total Population in R/ECAPs		81,505	-		86,519	-				
#1 country of origin	Mexico	24,281	29.79%	Mexico	26,084	30.15%				
#2 country of origin	Honduras	424	0.52%	Honduras	424	0.49%				
#3 country of origin	El Salvador	95	0.12%	El Salvador	98	0.11%				
#4 country of origin	Ecuador	75	0.09%	Ecuador	75	0.09%				
#5 country of origin	Portugal	63	0.08%	Portugal	63	0.07%				
#6 country of origin	Cuba	59	0.07%	Cuba	59	0.07%				
#7 country of origin	Venezuela	34	0.04%	Venezuela	34	0.04%				
#8 country of origin	Guatemala	29	0.04%	Guatemala	29	0.03%				
#9 country of origin	Argentina	27	0.03%	Argentina	27	0.03%				
#10 country of origin	Panama	25	0.03%	Panama	25	0.03%				

Table 12: Source: HUD-provided table for AFH analysis

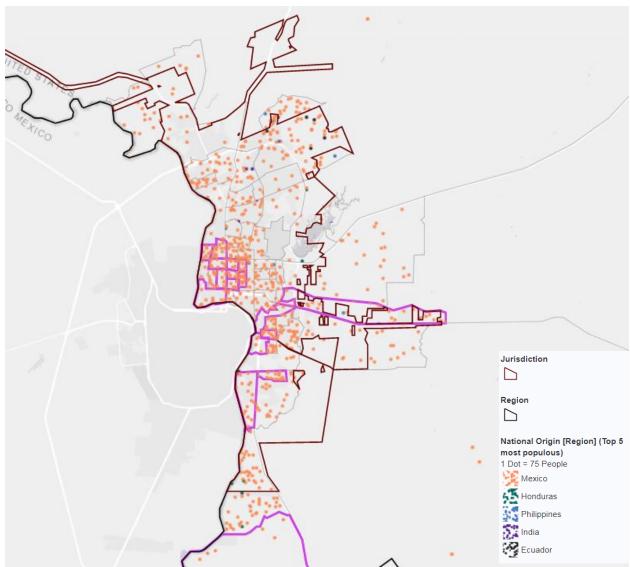
The top 10 countries representing individuals with a foreign national origin are identical in the city and region. There are subtle changes in order and percentage breakdowns, but overall remain very much the same.

Individuals from the Mexico represent the largest group with a foreign national origin in the city and region, accounting for 29 percent and 30 percent of the population, respectively. All other countries account for less than one percent of the total population.

In the city, Honduras, El Salvador, Ecuador, and Cuba comprise the next three highest ranking groups (in order). These countries are also represented in the region, in the exact same order.

The following map depicts all foreign born residents and their location in the city relative to R/ECAPs.

Figure 37 - R/ECAP Population by National Origin in Laredo and Region



Families with Children

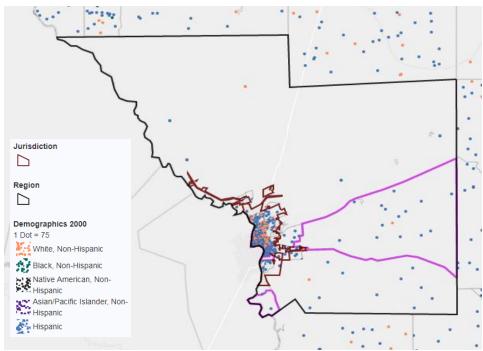
R/ECAP Population by Family Type in Laredo and Region

	(Laredo, TX CDBG, HOME, ESG) (Laredo, TX Jurisdiction Region			
R/ECAP Family Type	#	%	#	%
Total Families in R/ECAPs	18,025	-	19,079	-
Families with children	9,276	51.46%	9,892	51.85%

Table 13: Source: HUD-provided table for AFH analysis

In both the city and the region just over half of the families living in R/ECAPs have children. In 2010, 68 percent of families in the city had children and 63 percent of families in the region had children.

Figure 38 - Race/Ethnicity Trends, 1990



Region

Demographics 1990
1 Dot = 75

White, Non-Hispanic

Black, Non-Hispanic

Asian/Pacific Islander, Non-Hispanic

Hispanic

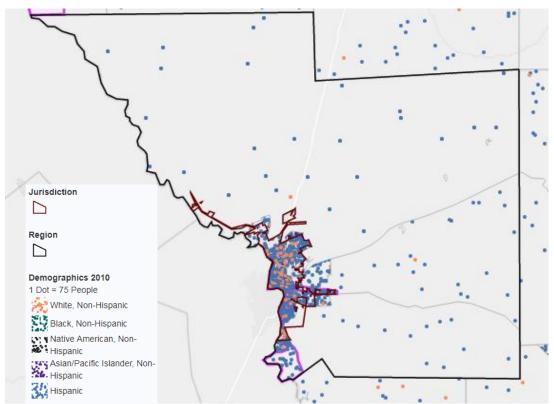


Figure 40 - Race/Ethnicity Trends, 2010

Disparity in Access to Opportunity

The following table presents Opportunity Indicators by Race and Ethnicity. Indicators of opportunity include school proficiency, labor market, transportation, jobs proximity, and environmental health by race and ethnicity and compares the City to the broader region; this data shows the following:

Opportunity Indicators by Race/Ethnicity

(Laredo, TX CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population						•	
White, Non-Hispanic	36.55	51.82	50.10	56.65	29.88	54.60	74.7
Black, Non-Hispanic	38.47	51.80	49.65	50.75	26.30	52.10	77.7
Hispanic	22.33	40.07	37.50	60.24	32.85	46.11	73.8
Asian or Pacific Islander, Non-Hispanic	44.13	56.09	56.64	55.38	29.09	60.45	76.18
Native American, Non-Hispanic	30.47	47.77	48.08	59.03	32.98	58.11	74.18
Population below federal poverty line							
White, Non-Hispanic	25.46	44.81	41.21	61.85	32.71	44.50	75.04
Black, Non-Hispanic	19.18	46.63	40.52	58.39	40.89	62.77	67.61
		22.46	27.75	63.70	37.66	43.80	71.62
Hispanic	10.94	32.16					
Hispanic Asian or Pacific Islander, Non-Hispanic	10.94 13.14	37.03	28.63	63.70	46.73	43.88	66.60
Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic			28.63 27.76	63.70 69.05	46.73 30.41	43.88	
Asian or Pacific Islander, Non-Hispanic	13.14	37.03					66.60 75.60
Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic (Laredo, TX) Region	13.14	37.03					
Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic (Laredo, TX) Region Total Population	13.14	37.03 34.09	27.76	69.05	30.41	30.22	75.60
Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic (Laredo, TX) Region Total Population White, Non-Hispanic	13.14 12.30	37.03 34.09 51.90	27.76	69.05 54.59	28.68	30.22 54.88	75.60 75.53
Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic (Laredo, TX) Region Total Population White, Non-Hispanic Black, Non-Hispanic	13.14 12.30 34.94 35.38	37.03 34.09 51.90 52.57	27.76 47.77 45.14	69.05 54.59 49.02	28.68 24.50	54.88 52.09	75.60 75.53 78.69
Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic (Laredo, TX) Region Total Population White, Non-Hispanic Black, Non-Hispanic Hispanic	13.14 12.30 34.94 35.38 21.53	37.03 34.09 51.90 52.57 40.86	27.76 47.77 45.14 36.08	54.59 49.02 57.87	28.68 24.50 31.51	54.88 52.09 46.38	75.60 75.51 78.69 74.61
Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic (Laredo, TX) Region Total Population White, Non-Hispanic Black, Non-Hispanic Hispanic Asian or Pacific Islander, Non-Hispanic	13.14 12.30 34.94 35.38 21.53 43.81	51.90 52.57 40.86 55.90	27.76 47.77 45.14 36.08 56.31	54.59 49.02 57.87 55.20	28.68 24.50 31.51 28.95	54.88 52.09 46.38 60.63	75.60 75.57 78.65 74.63
Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic (Laredo, TX) Region Total Population White, Non-Hispanic Black, Non-Hispanic Hispanic Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic	13.14 12.30 34.94 35.38 21.53 43.81	51.90 52.57 40.86 55.90	27.76 47.77 45.14 36.08 56.31	54.59 49.02 57.87 55.20	28.68 24.50 31.51 28.95	54.88 52.09 46.38 60.63	75.60 75.57 78.65 74.63
Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic (Laredo, TX) Region Total Population White, Non-Hispanic Black, Non-Hispanic Hispanic Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic Population below federal poverty line	13.14 12.30 34.94 35.38 21.53 43.81 28.51	51.90 52.57 40.86 55.90 48.65	27.76 47.77 45.14 36.08 56.31 45.26	54.59 49.02 57.87 55.20 54.36	28.68 24.50 31.51 28.95 30.86	54.88 52.09 46.38 60.63 58.92	75.66 75.57 78.66 74.61 76.30 75.66
Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic (Laredo, TX) Region Total Population White, Non-Hispanic Black, Non-Hispanic Hispanic Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic Population below federal poverty line White, Non-Hispanic	13.14 12.30 34.94 35.38 21.53 43.81 28.51	37.03 34.09 51.90 52.57 40.86 55.90 48.65	27.76 47.77 45.14 36.08 56.31 45.26	54.59 49.02 57.87 55.20 54.36	28.68 24.50 31.51 28.95 30.86	54.88 52.09 46.38 60.63 58.92	75.60 75.57 78.66 74.61 76.30 75.66
Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic (Laredo, TX) Region Total Population White, Non-Hispanic Black, Non-Hispanic Hispanic Asian or Pacific Islander, Non-Hispanic Native American, Non-Hispanic Population below federal poverty line White, Non-Hispanic Black, Non-Hispanic	13.14 12.30 34.94 35.38 21.53 43.81 28.51	37.03 34.09 51.90 52.57 40.86 55.90 48.65	27.76 47.77 45.14 36.08 56.31 45.26	54.59 49.02 57.87 55.20 54.36	28.68 24.50 31.51 28.95 30.86	54.88 52.09 46.38 60.63 58.92 45.41 62.77	75.60 75.57 78.69 74.61 76.30 75.60 75.60

Table 14: Opportunity Indicators by Race/Ethnicity, HUD AFFH Data

The School Proficiency Index measures the proficiency of elementary schools in the attendance area of individuals sharing a protected characteristic within 1.5 miles of the block-group. The values for School Proficiency Index are determined by the performance of 4th grade students on state exams to describe which neighborhoods have high performing elementary schools nearby, and which are near lower performing elementary schools. The spatial distribution of racial/Ethnicity and national origin groups and families with children, overlaid by shading that shows school proficiency levels for the jurisdiction and the region. In each map, lighter shading indicate areas of lower opportunity and darker shading indicates higher opportunity.

In the City of Laredo, Asian residents generally live in neighborhoods with greater access to proficient schools, with the highest school proficiency score of 56.09. The next highest index value is captured by White, non-Hispanic and Black non-Hispanic at 51.82 and 51.80 respectively and Native-Americans with a score of 47.77. The Hispanic population has a school proficiency index value of 40.07, which is more than 16 points lower than the Asian population.

Analyzing persons living below the federal poverty line within the City of Laredo, White, non-Hispanic and Black non-Hispanic populations have the highest value index ranging from 46.63 to 44.81, showing greater access to neighborhoods with proficient schools, with Asian and Native American somewhat lower at 37.03 and 34.09. Hispanic residents maintain the lowest score of 32.16 (Table 14).

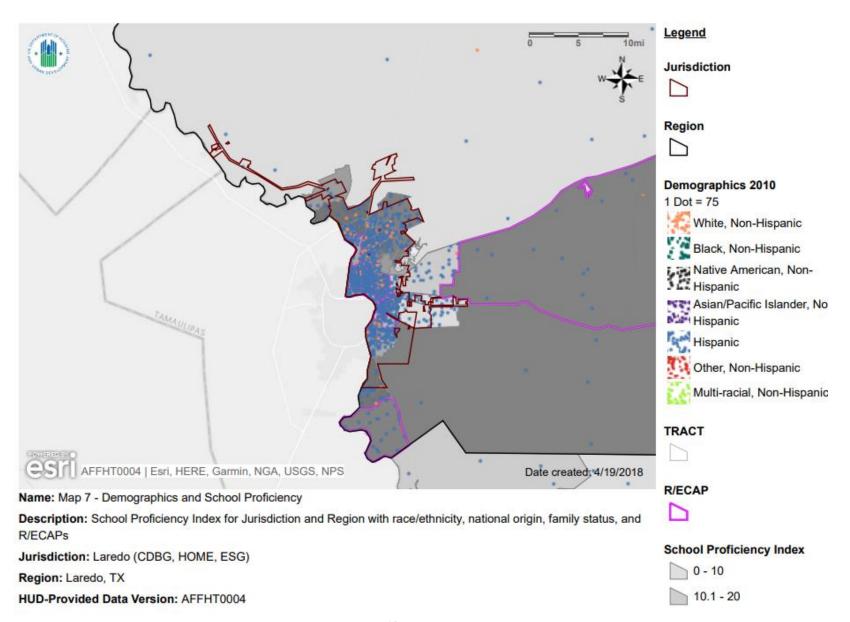
At the regional level, similar results emerge, with Asian, White, and Black non-Hispanic groups assigned the highest indices of access to proficient schools, ranging from 51.90 to 55.90. Native Americans have somewhat greater access to good schools at the regional level, with an index value of 48.65, while Hispanic populations have a virtually the same access, with an index value of 40.86. Looking at the population below the federal poverty line, Whites, Asians, and Blacks have greater access to proficient schools having the highest scores compared to Hispanic.

The Hispanic population tends to live in neighborhoods that have less access to proficient schools at both regional level and at the City level.

Areas of the City that have higher percentage of owner-occupied units and characterized as predominantly White have both a smaller percentage of families with children, and a higher index of access to proficiency schools, compared to other areas. On the other hand, other racial/ethnic groups such as Blacks, Hispanics, Asians, tend to live in areas of the City where there are high number of aging renter-occupied units and have either moderate or low access to proficient schools according to the access to School Proficiency Index provided by HUD.

The City of Laredo is served by the Laredo independent School District and the United Independent School District. According to comments from stakeholders, the United Independent School District is the most adept at providing quality education for Laredo students. Meeting participants voiced concerns differences in school provisions for the LISD as opposed to the UISD which in Laredo is highly correlated with access to housing type and affordability. For example, where census blocks exhibit high concentrations of low-income, Hispanic children and are all assigned to the same school zone, this disproportionate ratio impacts overall school performance, as measured by state exam scores.

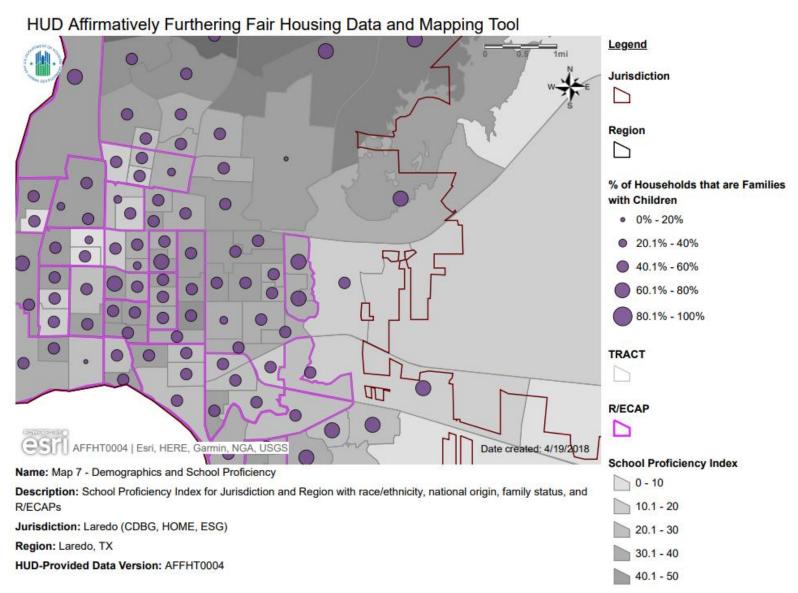
Figure 41 - School Proficiency Index and Race/Ethnicity



Legend Jurisdiction Region National Origin [Jurisdiction] (Top 5 most populous) 1 Dot = 75 People Mexico Honduras Philippines Ecuador TRACT R/ECAP AFFHT0004 | Esri, HERE, Garmin, NGA, USGS, NPS Date created: 4/19/2018 Name: Map 7 - Demographics and School Proficiency School Proficiency Index Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and 0 - 10 R/ECAPs 10.1 - 20Jurisdiction: Laredo (CDBG, HOME, ESG) 20.1 - 30 Region: Laredo, TX 30.1 - 40 **HUD-Provided Data Version: AFFHT0004**

Figure 42 - School Proficiency Index and National Origin

Figure 43 - School Proficiency Index and Familial Status



Employment Opportunities

According to the AFFH Data Documentation the Labor Market Index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a Census Tract. While, the Job Proximity Index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations and measures the physical distances between place of residence and jobs by Race/Ethnicity. Values range from 0 to 100. The higher the index value, the better the access to employment opportunities for residents, high labor force participation, and high human capital of a neighborhood.

According to the Job Proximity Index categories from Table 14 at the City level, White, Asian, and Native American populations have scores above 55, indicating homes in closer proximity to work places than those of Black and Hispanic populations, which show scores of 52.10 and 46.11, respectively. For the segment of the population below the federal poverty line within the City, the Black non-Hispanic population maintains the highest score of 62.77, compared to the rest of the racial/ethnic groups, which have significantly lower scores ranging from 30.22 to 44.50.

The Job Proximity Index values are lower at the regional level than the City. Regionally, the highest Job Proximity Index score is 60.63, reflected by Asian groups. Native Americans are next with a value of 58.92. Whites and Black non-Hispanic have similar scores of 54.88 and 52.09. The Hispanic population has the lowest score of 46.38. For populations below poverty at the regional level, all Race/Ethnicity groups' scores range from 29.75 to 62.77 with Native Americans with the lowest score and Black, non-Hispanics had the highest score.

Based on labor market engagement data, White and Asian populations in Laredo have the highest labor-force participation with index values of 50.10 and 56.64 respectively. Native American, Hispanics and Blacks, have lower scores ranging from 37.50 to 49.65 with Hispanic being the lowest. Of the population below the federal poverty line in the City, White and Blacks have the highest participation index value of 41, more than ten points higher than the next highest groups of Asians and Native Americans, with scores of 28.63 and 27.76, respectively. Hispanics have the lowest labor force participation with scores of 27.75. The residents of Laredo overall demonstrate a somewhat higher labor market engagement than their counterparts in the region.

At the regional level, Whites also have higher labor market engagement with a score of 40.03. However; Blacks maintain the highest score of 40.52. Other races and Ethnicities scores range from 26.59 to 28.63 with Hispanic populations having the lowest labor engagement score.

In conclusion, all population groups in the City demonstrate moderate employment participation. At both the City and regional level White, Asians, and Blacks, have somewhat higher labor force participation even when controlling for income; Whites and Black show a more than ten point difference compared to Hispanics. The same groups scoring higher on the participation index are also the groups that demonstrate a slightly greater access to jobs, by spread of just five points on the proximity index. Based on the Jobs Proximity Index (Table 14), Hispanics are the least successful in accessing employment with a score of 46.11, which is more than 14 points below the Asian population (60.45) and 12 points below Native Americans (58.11), 8 points below the White population (52.10) and 6 points below the Black population. Further, of all foreign-born residents, those of Mexican, national-origin appear to be less likely to have opportunity to access the labor market (Figures 14 and 15). Language barriers and associated educational attainment levels likely contributed to these results.

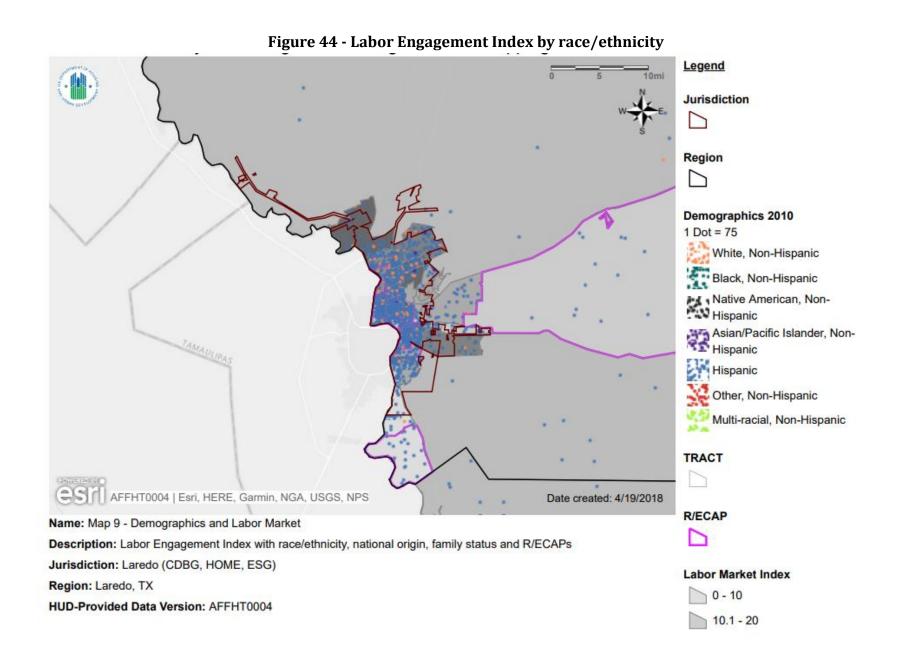


Figure 45 - Labor Engagement Index by National Origin

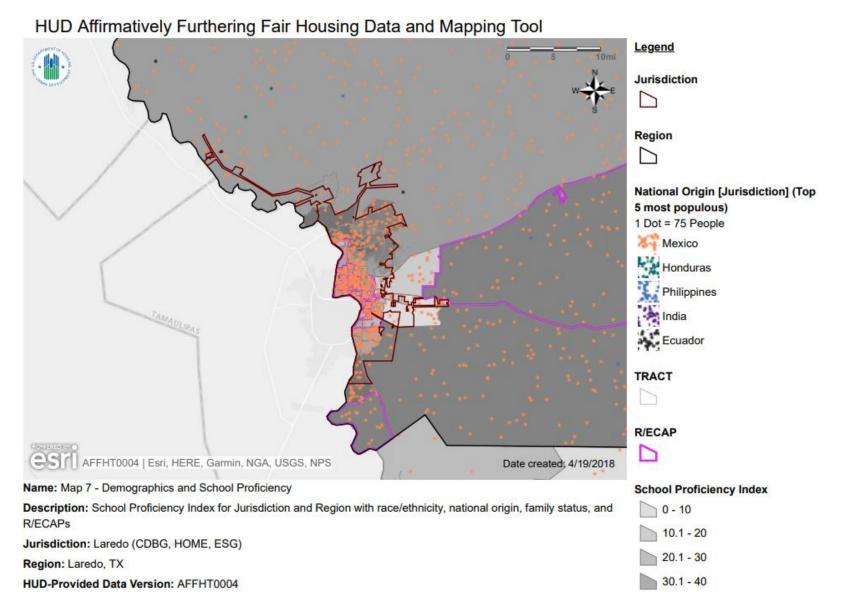
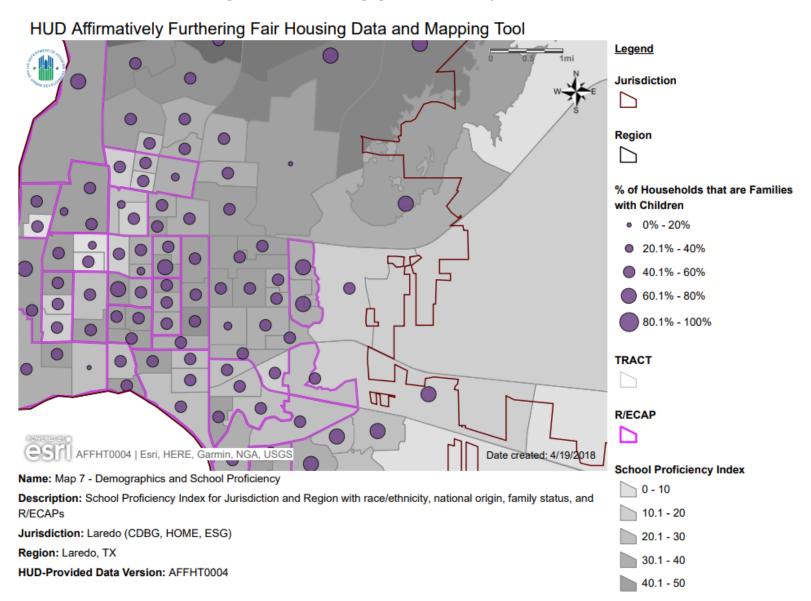


Figure 46 - Labor Engagement Index by Familial Status



Transportation Opportunities

Public transportation in the City consists of fixed bus routes and par-transit services, available primarily along commercial corridors and within activity centers. El Metro operates a special door-to-door transit service within Laredo and the region for persons with disabilities.

Within the AFFH Data Documentation, HUD describes how the Low Transportation Cost Index (Table 14) measures cost of transportation and proximity to public transportation by neighborhood. The Index values range from 0 to 100. The higher the index, the lower the cost of transportation in that neighborhood. Also, the Transit Trips Index (Table 14) measures how often low-income families in a neighborhood use public transportation. The higher the value, the greater the number of trips taken, thus indicating the more often a neighborhood utilizes public transit.

Both indexes are based on estimates of transportation costs for a family that meets the following description: a 3-person, single-parent family with income at 50% of the median income for renter for the region. HUD data (Figures 19 through 24) displays the Low Transportation Cost Index based on racial/ethnicity, national origin, and households with children for both the City and the region. Lighter shading indicates areas of lower opportunity, and darker areas indicate areas of higher opportunity.

At the City level, public transportation appears to be accessible and used almost equally by all racial/ethnic groups, with values ranging from 50.75 to 60.24, with Hispanic population having the highest score of 60.24. For the population below the federal poverty line, all race/ethnic groups show scores above 58, ranging from 58.39 to 69.05. Native Americans, Hispanics, and Asians have the greatest use and accessibility to public transportation having scores of more than 63. The Low Transportation Cost Index at the City level shows that Hispanics and Native Americans often live closer to public transportation, using public transportation more out of the total population. However, there is a fairly even spread among all racial and ethnic groups with the lowest score of 26.30.

At the regional level, Hispanics, Asians, Blacks, and Whites use public transportation more often, as indicated by index scores ranging from 54.36 to 57.87 and Blacks with the lowest score of 49.02. For the population below the federal poverty line, Native Americans, Hispanics, and Asians have the greatest accessibility and use of public transportation, with comparable scores of 67.96, 63.70, and 60.47, while Blacks (58.39) and Whites (59.47) are comparable. The Low Transportation Cost Index at the regional level, also shows Hispanic and Asian populations as being the groups that live closer to public transportation and comparatively lower public transportation costs.

Even when controlling for income at the City and regional level, Hispanic, Native Americans, and Asian populations continue to more often utilize public transit and have the lower cost of transportation. In general, Hispanic Native Americans, and Asian residents of Laredo have easier access to transit than the region, and at a lower cost.

Based on the maps provided by El Metro bus stops map in the figure below, bus routes are congested in the transit center due to poor route planning times. Access to the downtown transit center and the Mall de Norte is somewhat limited and so is transportation to the bridge to Nuevo Laredo.

Legent
I larte Ple
2.4 San Barri
I larte Ple
2.5 San Barri
I larte Ple
2.5 San Barri
I larte Ple
2.5 San Barri
I larte
I larte
I color
I Color
I LCC
I Trought Tax
Center
I Park & Rold,
A report (3) LAREDO ELMERO REAL TIME El Metro Transit Center

Figure 47 - El Metro System Route Map

<u>Legend</u> Jurisdiction Region Demographics 2010 1 Dot = 75 White, Non-Hispanic Black, Non-Hispanic Native American, Non-Hispanic Asian/Pacific Islander, Non-Hispanic Hispanic Other, No Other, Non-Hispanic Multi-racial, Non-Hispanic TRACT Date created: 4/20/2018 R/ECAP Name: Map 10 - Demographics and Transit Trips Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs Transit Trips Index Jurisdiction: Laredo (CDBG, HOME, ESG) 0 - 10 Region: Laredo, TX 10.1 - 20 **HUD-Provided Data Version:** AFFHT0004 20.1 - 30 30.1 - 40

Figure 48 - Transit Trips by Race and Ethnicity

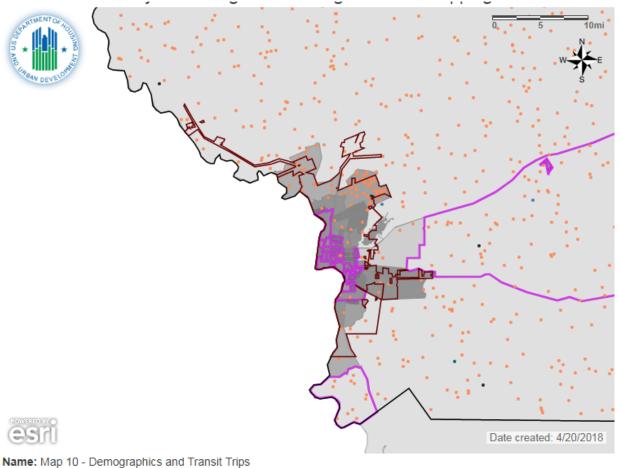


Figure 49 - Transit Trips by National Origin

Description: Transit Trips Index for Jurisdiction and Region with race/ethnicity, national origin, family status and

R/ECAPs

Jurisdiction: Laredo (CDBG, HOME, ESG)

Region: Laredo, TX

HUD-Provided Data Version: AFFHT0004

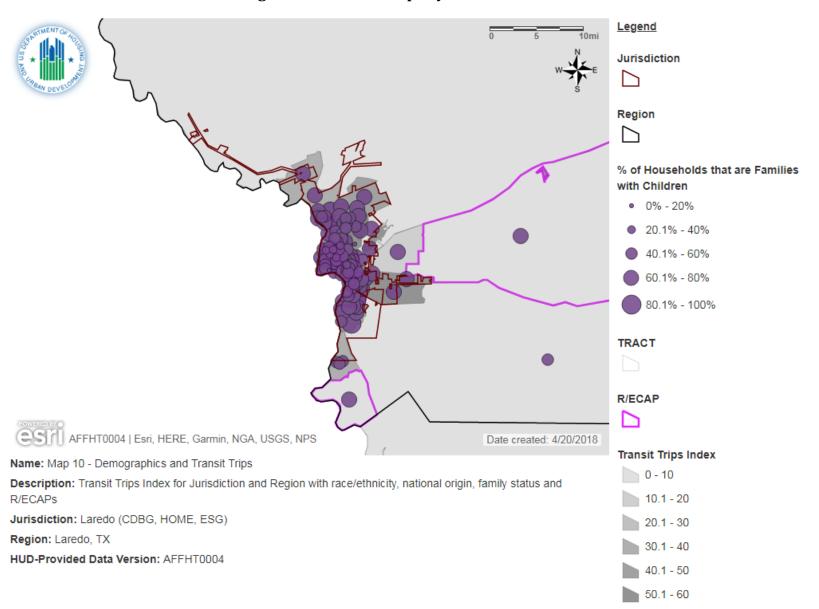


Figure 50 - Transit Trips by Familial Status

Low Poverty Exposure Opportunities

The Low Poverty Index provided by the HUD in Table 14 uses rates of family poverty by household to measure exposure to poverty by neighborhood. A higher score generally indicates less exposure to poverty at the neighborhood level. For this analysis, HUD also provides maps that indicate geographic distribution of the Low Poverty Index by Race/Ethnicity, national origin, and households with children. Lighter shading indicates areas of lower opportunity and darker shading indicates areas of higher opportunity.

According to the Table 14, Hispanics in Laredo experience the highest instance of poverty with a score of 22.33 on the Low Poverty Index; Black, White, and Native American populations follow with a higher exposure to poverty as indicated by the index value ranging from 30.47 to 38.47. Asians have less exposure to poverty having a score of 44.13. Overall all races and ethnicities experience a significant exposure to poverty in Laredo. When controlling for income, the exposure to poverty is even higher with the Hispanic population having the highest exposure to poverty with an index score of 10.94.

A person's place of residence has a great impact on their exposure to poverty. Even though the analysis has shown that no R/ECAPs Census tracts exist in the City, one can identify areas where households that live below the federal poverty level demonstrate trends toward segregation, limited access to opportunities, and one or more housing problems, like cost-burdened conditions.

Regionally, across all ethnicities and races the trend remains that Hispanics in the region experience the highest instance of poverty with a score of 21.53 on the Low Poverty Index; while Black, White, and Native American populations follow with a higher exposure to poverty as indicated by the index value ranging from 28.51 to 35.38. Asians have less exposure to poverty with a score of 43.81. Overall all races and ethnicities experience a significant exposure to poverty in the region as well. When controlling for income, the exposure to poverty is even higher with the Hispanic population having the highest exposure to poverty with an index score of 10.63.

Figure 51 - Poverty Exposure by Race and Ethnicity

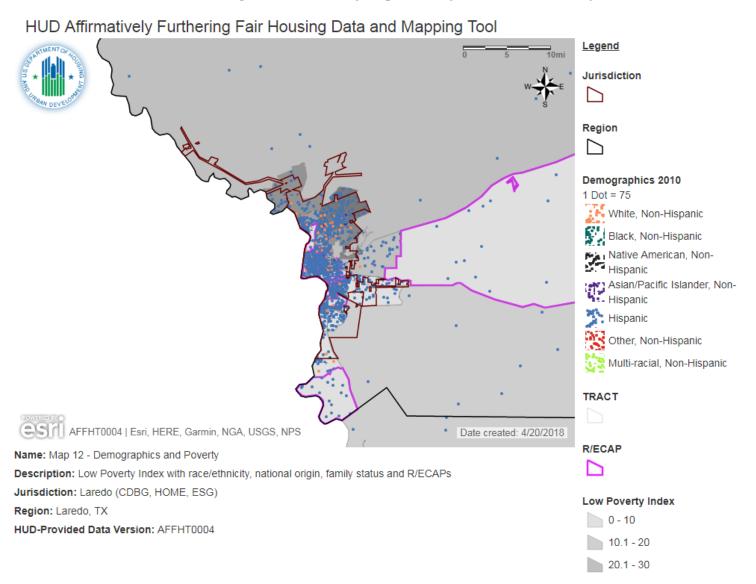


Figure 52 - Poverty Exposure by National Origin

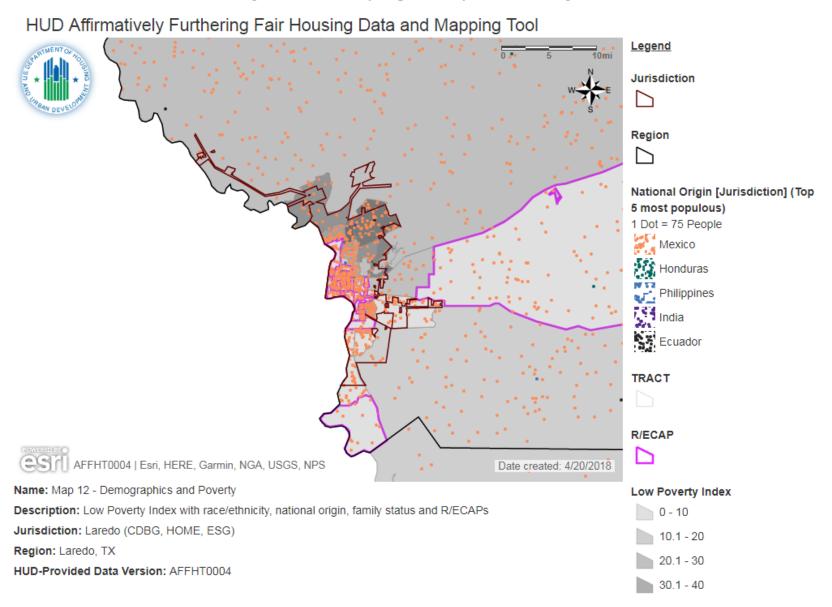
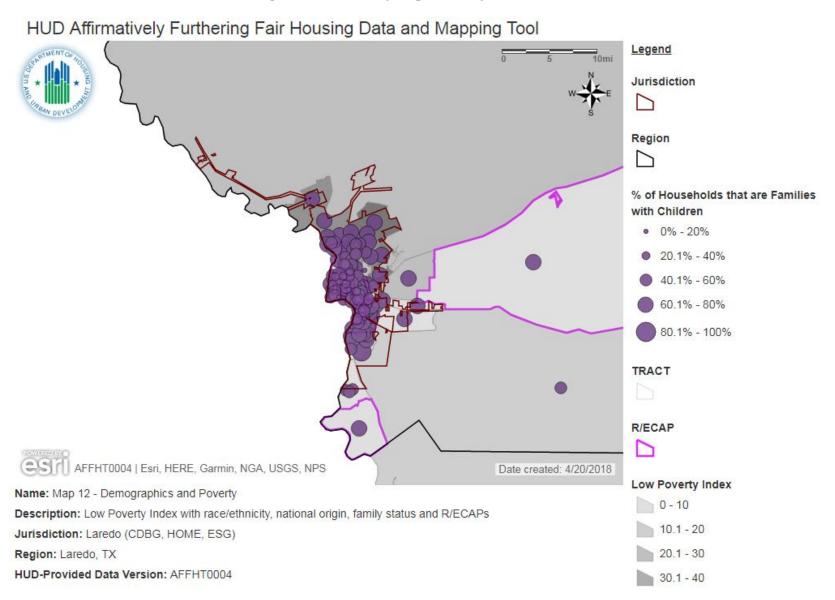


Figure 53 - Poverty Exposure by Familial Status



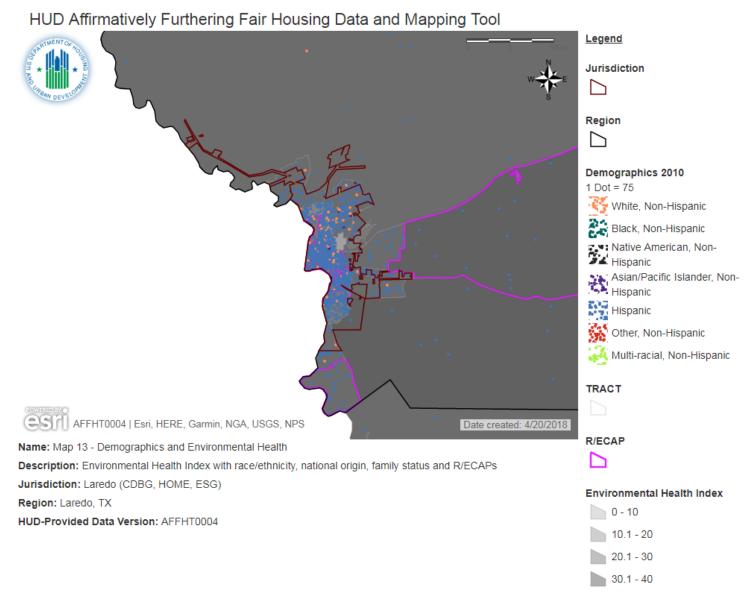
Environmentally Healthy Neighborhoods

The Environmental Health Index shown in Table 14 and Figures 28 through 30 measures exposure air quality carcinogenic, respiratory and neurological toxins by neighborhood in Laredo, based on Race/Ethnicity, national origin, and households with children. Values range from 0 to 100. Higher values indicate a better environmental quality. Lighter shading indicates areas of lower quality and darker shading indicates areas with greater access to healthy environments.

The Environmental Health Index score shows that all groups in Laredo experience a similar level of exposure to environmental toxins with scores around 75. Blacks have the highest score of 77.72 that is, the least exposure compared to other groups; and all other races scores show a slight increased exposure with Hispanic, Native Americans, Asian, and White populations have essentially the same score of 75. When controlled for income, Blacks and Asians have a higher exposure to environmental hazards with a score of 67.61 and 66.60. Hispanics at lower incomes have a similar score at 71.62 and Whites and Hispanics have less exposure to environmental hazards.

The Regional Environmental Index reveals very similar values across all racial and ethnic groups. The Black population has the highest score of 78.69, followed by Asians a score of 76.30. Native Americans are third with a score of 75.66, Whites are fourth with a score of 75.57, and the Hispanic population is the group with the lowest score of 74.61, meaning that this is the group experiencing the most exposure to toxins and air pollutants, albeit there is only a 4 point difference between the most exposure and the least exposure. Analysis of populations below the federal poverty line within the region show little difference from those groups above the poverty level.

Figure 54 - Environmental Health Index by Race/Ethnicity



89

Figure 55 - Environmental Health Index by National Origin

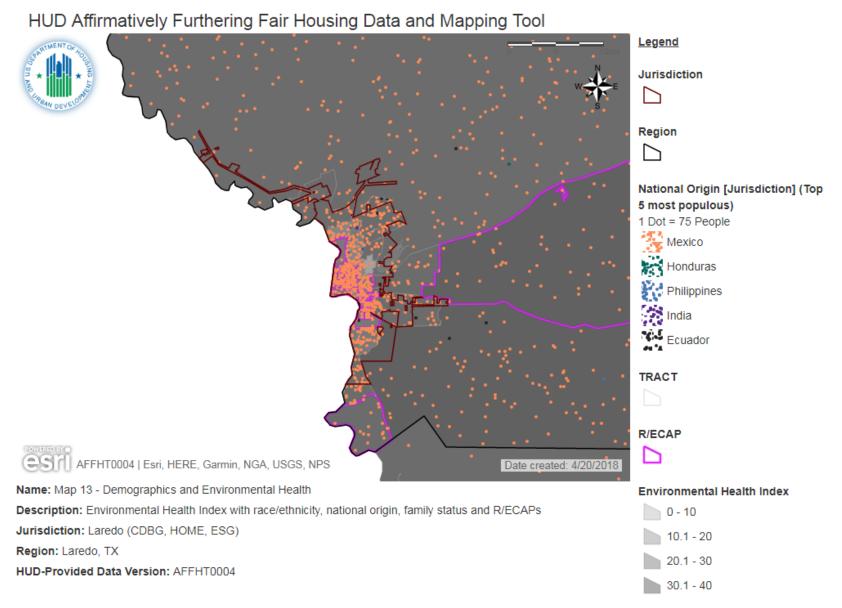
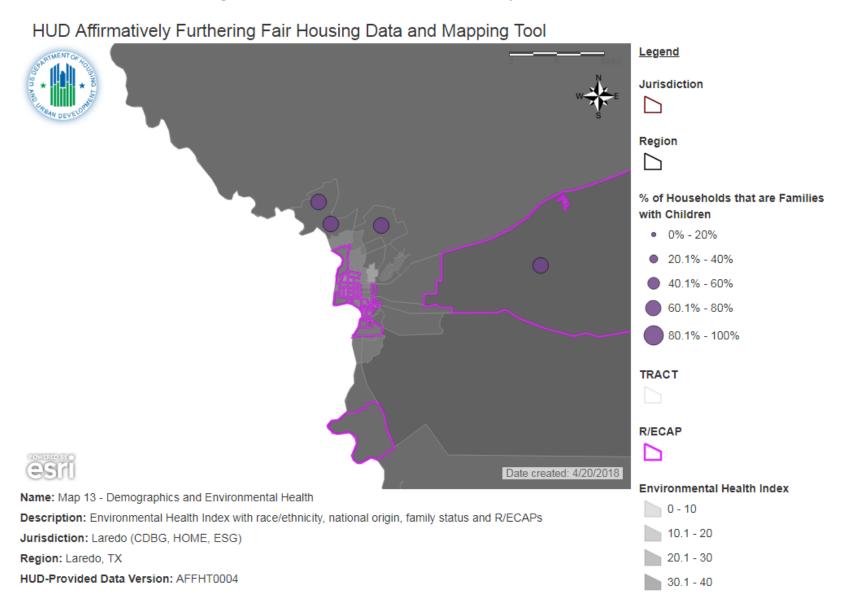


Figure 56 - Environmental Health Index by Familial Status



91

Disproportionate Housing Needs

Housing Problems

HUD defines housing problems as a household experiencing one or more of the following issues: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 30 percent. HUD further defines severe housing problems as having more than 1.5 persons per room and a cost burden greater than 50 percent. The lack of opportunity to build quality, affordable housing in multi-family units due to a disproportionate amount of land allocated to single-family uses certainly affects the ability of families to meet their housing needs. Furthermore, areas where homes for people with disabilities can be constructed or developed are extremely limited and, in most cases, require planning approval and public hearings.

According to the most recent Comprehensive Housing Affordability Strategy (CHAS) data provided by HUD, nearly a half of all households (65,015) experience housing problems and just over 31 percent of those households experience severe housing problems. A review of data provides an overall view of the housing needs including number and type of household and those experiencing housing problems including substandard conditions, overcrowding, and cost burdens, for both renters and owners². The following map shows the percentage of households that are cost burdened in Laredo and further outlines the R/Ecaps based on race/ethnicity dot density.

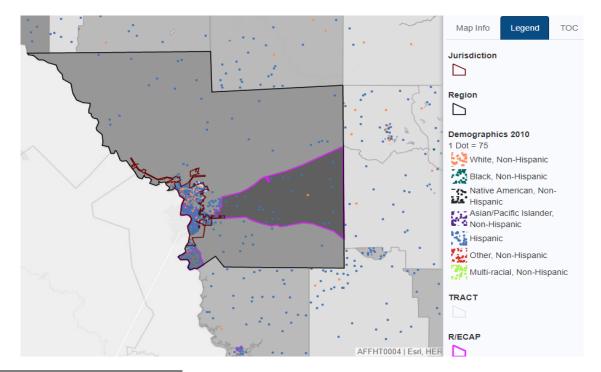


Figure 57 - Percentage of households who are Cost Burdened

_

² HUD Consolidated Planning/CHAS data, https://www.huduser.gov/portal/datasets/cp.html

Because Laredo's ethnic population is majority Hispanic, these households are located throughout the City and are not limited to a certain area. Housing problems, including cost burdens, may cause more difficulty no matter the household's income. However, the areas with the greatest percentage of households with burden generally align with R/ECAPs throughout Laredo and are in predominately Hispanic neighborhoods.

HUD defines a disproportionately greater need exists when the members of racial or ethnic groups at a given income level experience housing problems at a greater rate (10% or more) than the income level for the entire population.

The following table shows the percentage of race/ethnicity groups experiencing one of four housing problems: housing cost burden (defined as paying more than 30 percent of income for monthly housing costs including utilities), overcrowding, lacking a complete kitchen, or lacking plumbing.

Disproportionate Housing Needs	Laredo, TX CDBG, HOME, ESG Jurisdiction				
Households experiencing any of four problems	#HH w/problems	Total #HH	%HH w/problems		
Whole	25095	35945	69.81%		
White	715	11565	6.18%		
Black	50	10900	0.46%		
Asian	70	10920	0.64%		
Native American, Alaska Native	10	10860	0.09%		
Pacific Islander	0	10850	0.00%		
Hispanic	17395	28245	61.59%		

Table 15: Source, HUD AFFH data

The City of Laredo's population is over 95 percent Hispanic with just under 5 percent of the population identifying as other ethnic origins. Nearly 88 percent of the population identify as white, about 9 percent some other race, just over 1 percent identify as multi-racial, and less than 1 percent identify as black, white, or Asian. As shown in the table above, 61.6 percent of the Hispanic population experienced one or more housing problems and 6.1 percent of white households experienced housing problems. At first glance, it appears that there is no one racial/ethnic group experiencing a disproportionate housing need since there is no group trending higher than 10 percent of the whole group. However, when we consider that a person that identifies as Hispanic may also identify as white or any other racial category, the data can be skewed to show that the Hispanic population is not experiencing a disproportionate housing need.

According to the City's most recent Consolidated Plan, income levels have a direct correlation to the number of severe housing problems occurring. At the extremely low level of income the number of Hispanics experiencing one or more severe housing problems is 6,750, decreasing by 1.93% at the very low- income level with a total of 4,930 members who have housing problems. The low-income level demonstrates a total of 3,810 Hispanics with housing problems decreasing by 0.92% at the moderate- income level with a total of 1,250 Hispanics experiencing housing problems.

Housing Market Trends

The sales housing market in the Laredo Housing Market Area (HMA) remains balanced. The vacancy rate is estimated at 1.4 percent which represents a slight decrease from 1.9 percent in 2010. The number of new homes sold from January 2014 through January 2015 totaled 510, down 9 percent from the nearly 560 homes sold during the previous 12 months. New home sales have decreased 67% from the peak average of 1,580 sold annually during 2006 and 2007 and remain 31 percent less than the average of 640 homes sold annually from 2008 through 2012. The average sales price of a new home was \$199,500 during the 12 months ending January 2015, up \$8,700, or nearly 5 percent, compared with the sales price a year earlier. By comparison, the average sales price of new homes peaked at \$203,400 during 2006 and 2007.

Existing home sales totaled 2,200 during in 2015 which was a minimal increase over the previous year. Existing home sales are 24 percent less than the highest number of homes sold annually from 2005 and 2006 but are slightly more than the average of 1,725 homes sold from 2008 through 2012. The average sales price of an existing home was \$153,300 during 2014.

For 2014, real estate owned (REO) property sales totaled 350, or less than 12 percent of all home sales in the HMA, which is down from the 440 REO sales during 2013, when REO sales accounted for 14 percent of all existing single-family home sales. During 2005 and 2006, before the housing downturn, REO sales averaged 130 annually and accounted for approximately 3 percent of all home sales. The average sales price of an REO home is less than the average sales price of a non-REO home in the HMA, and the high percentage of REO sales, relative to recent history, continues to negatively affect existing single-family sales prices.

Single-family homebuilding activity, as measured by the number of single family homes permitted, has increased each year since 2011 but remains below prerecession levels. The number of single-family homes permitted during the 12 months ending January 2015 increased by 50, or 5 percent, to 960 single-family homes compared with the number of homes permitted during the 12 months ending January 2014. The number of homes permitted peaked from 2004 through 2006, at an average of 1,825 homes permitted

annually, but declined to an average of only 660 homes permitted annually from 2008 through 2010. Figure 7 shows the number single-family homes permitted by year since 2000. Single-family housing subdivisions currently in development include the 148-home Las Ventanas on the east side of the city of Laredo, which broke ground in 2012. Home prices at Las Ventanas start at \$125,000, and the development is about 75 percent complete. Green Ranch, which broke ground in 2006, is on the northwest side of the city of Laredo and will have an estimated 350 homes when complete. The development currently has home prices starting at \$149,900 and is about two-thirds complete.

The rental housing market in the Laredo HMA is currently stable, with increased multifamily construction activity stabilizing the rental market after a shortage of rental housing associated with the start of work in the Eagle Ford Shale oil and natural gas field in 2010. As of February 1, 2015, the rental vacancy rate, which includes single-family homes, mobile homes, and apartment units, is estimated at 6.6 percent, down from 7.8 percent in April 2010 (Figure 8). The apartment market is estimated to be slightly tighter than the overall rental market but also balanced. The apartment market had a vacancy rate of 6.4 percent as of January 2015, up from 4.6 percent the previous year and an estimated 5 percent in April 2010 (Reis, Inc.). During January 2015, apartment rents averaged \$672, \$823, and \$1,009 for one-, two-, and three-bedroom units, respectively. Rent increases have averaged \$40, \$20, and \$45, or 6, 3, and 5 percent, annually for one-, two-, and three-bedroom units, respectively, since 2010.

Beginning in late 2010, the overall rental market tightened significantly in response to the influx of workers into the Eagle Ford Shale area. The oil and natural gas field workers moved into the HMA quickly and absorbed many of the available units, and no immediate increase in the number of available rental housing units was made to meet this demand; therefore, vacancy rates dropped, and rents rose. Development of new rental units, which began in late 2011, began to balance the market. During the first quarter of 2013, when the rental market is estimated to have been the tightest, the apartment vacancy rate was 3.3 percent.

Multifamily development has increased substantially since the late 2000s and remains at record-high levels. During the 12 months ending January 2015, 1,125 multifamily units were permitted, up 47 percent from 760 units permitted during the previous 12 months, all intended for renter occupancy (preliminary data). The rate of building activity in 2014 was nearly double the 575 multifamily units permitted in 2004, which was the prerecession peak year for multifamily units permitted (Figure 9). From 2004 through 2008, the number of multifamily units permitted averaged 430 a year. The number declined to an average of only 95 multifamily units permitted annually during 2009 and 2010. An average of 740 multifamily units was permitted each year from 2011 through 2014.

Contributing Factors of Disproportionate Housing Needs

Influx of Seasonal Employees:

Seasonal workers for the Eagle Ford Shale are not counted as permanent residents of Laredo and adversely impact rental affordability and vacancy rates. A common schedule for workers in the Eagle Ford Shale consists of working for 3 weeks straight, followed by 2 weeks off. The individuals, or sometimes the firms they work for, lease housing units in the area. The workers are not considered residents because it is likely that they will return to their permanent place of residence when they are not working. Such workers are not included in the population or resident employment counts in the HMA, but they may be counted as being at the location of a regional office. Although these employees do not establish a permanent residence in the HMA, they have a significant effect on its rental housing market affordability.

The availability of affordable units in a range of sizes:

There is a mismatch between household income and housing costs. Due to cultural norms, many families live multi-generationally which makes the household size trends larger in Laredo. Given the large number of families in the city, the lack of affordable rentals with larger bedroom counts is certainly a contributing factor to family households with children facing disproportionate housing needs.

Publicly Supported Housing Analysis

Publicly supported housing analysis includes an examination of public housing; Project-Based Section 8; Other HUD Multifamily Assisted developments; and the Housing Choice Voucher (HCV) Program. The Project-Based Section 8 category includes only those subsidized housing developments where the owner has a contract directly with HUD, and does not include project-based developments where the owner has a Housing Assistance Payments contract directly with the Laredo Housing Authority. LHA administered vouchers, both for tenant-based and project-based units, are included in the HCV Program category. Please also note that HUD data combines race and ethnicity, i.e. a Black or White Hispanic resident is classified in the HUD tables only as Hispanic and is not counted separately as either Black or White.

PICTURE OF SUBSIDIZED HOUSING

				Asian/Pacific	Native
Publicly Supported Housing Category	White	Black	Hispanic	Islander	American
Public Housing	986	2	985	0	0
Project Based Section 8	0	0	0	0	0
Other Multifamily	10	0	9	0	0
HCV Program	1370	2	1365	0	0
Total	2366	4	2359	0	0

Table 16: *Picture of Subsidized Housing, Source:* https://www.huduser.gov/portal/datasets/assthsg.html

PICTURE OF SUBSIDIZED HOUSING

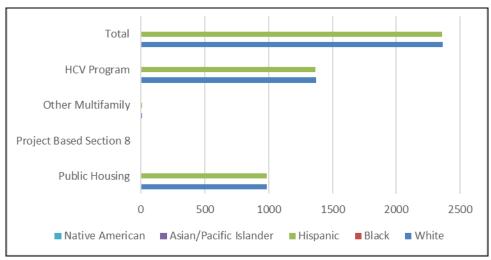


Chart 1: Picture of Subsidized Housing, Source: https://www.huduser.gov/portal/datasets/assthsg.html

As shown, white and Hispanic households predominate in publicly supported housing both in absolute numbers and relative percentages, followed in descending order by black households. Since over 95 percent of the population is Hispanic, nearly all the publicly supported households regardless of race represent a Hispanic ethnicity.

Disability

A total of 166 families residing in Laredo Public Housing are disabled with one or more disabilities. An estimated 11.6 percent of Laredo's population age five and older live with one or more disabilities. In comparison, an estimated 22.87 percent of all households in all publicly supported housing reported that they have a disability with the highest percentage

(16.67 percent) from the HCV program. Additionally, there is a strong demand for accessibility features and of the 1,268 families on the waiting list, at least 20 have at least one disabled family member.

Disabled Families

60

2

Figure 58 - Disabled Families

Families with Children

As detailed below, 43.8 percent of Laredo's households are families with children compared to 30.0 percent of all publicly supported housing. All publicly supported housing categories have lower percentages of households with children than the citywide Chart. It should be noted that the Other HUD Multifamily Assisted category consists of greater than 97 percent studio and one-bedroom apartments, and are generally not intended for occupancy by children. The Project-Based Section 8 category consists of 74.2 percent studio and one-bedroom units. Additionally, some Public Housing developments and units are designated for occupancy by elderly persons, which at LHA includes persons age 55 and over.

■ Public Housing ■ Project Based Section 8 ■ Other Multifamily ■ HCV Program ■ Total

Publicly Supported Housing Location and Occupancy

Public Housing in the City consists of the following nine properties throughout Laredo and Asherton serving 994 families. As shown in the maps below, each of the public housing units are in racial and ethnically concentrated areas of poverty.

Colonia Guadalupe is the first public housing development in the Laredo and completed construction in 1941. The property is located at the corner of Park and International Highway 35 and houses 272 single-family homes. It is bordered by San Dario

Ave./International Highway 35 to the east, Gonzalez St. to the north, San Leonardo Ave. to the west, and Park St. to the south.

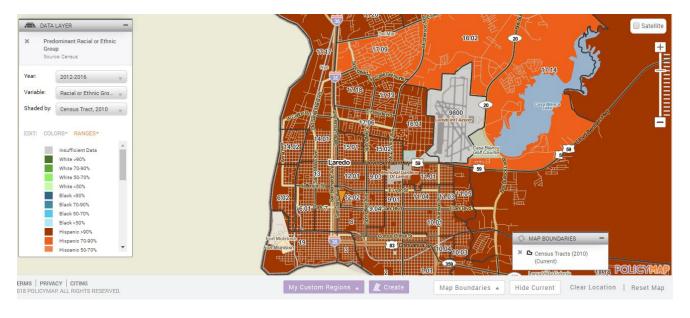


Figure 59 - Colonias Guadalupe

Russell Terrace was finished in 1957 and is the second oldest development belonging to the Laredo Housing Authority. It is made up of 200 single-family homes. Russell Terrace is located on 500 Richter Dr. and it is bordered by Springfield Ave. to the east, E Ash St. to the north, Logan Ave. to the west, and E Plum St. to the south.

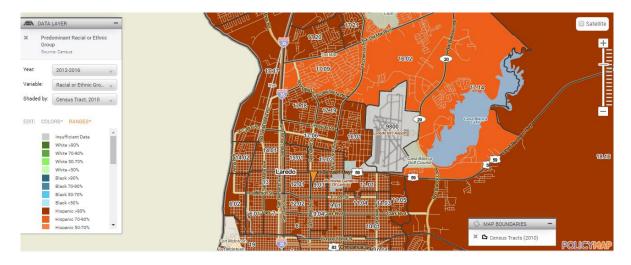


Figure 60 - Russell Terrace

Springfield Acres (Ana Maria Lozano) and Carlos Richter makes up 226 units. Ana Maria Lozano was finished in 1980 and is made up of 126 single-family homes. Carlos Richter was finished in 1960 and is made up of 100 single-family homes. Ana Maria Lozano is located on 6500 Springfield Ave. It is traversed by Springfield Ave. and Gale St.

Figure 61 - Ana Maria Lozano

Carlos Richter is located on 1700 Circle Dr. It is bordered by Santa Rita Ave. to the east, Blair St. to the north, Santa Maria Ave to the west, and Frankfort St. to the south. It is traversed by Main St.



Figure 62 - Carlos Richter

AMP 4 is made up of the Senior Citizens Home and Meadow Elderly. Senior Citizens Home was originally the site of the downtown Mercy Hospital was acquired 1961. The new building was completed in 1963 and is made up of 100 apartments on 7 stories. Meadow Elderly was built in 1983 and contains 30 single-family homes. Seniors Citizens Home is located on 700 Juarez St. and is bordered by Santa Maria Ave. to the east, Matamoros St. to the north, and Farragut St. to the south.

Figure 63 - Senior Citizens Home

Meadow Elderly is located on 3119 Seymour Circle. It is bordered by Loring Ave. to the east, the Catholic Cemetary to the north, N. Meadow Ave. to the west, and E Plum St. to the south.



Figure 64 - Meadow Elderly.

AMP 5 is made up of Meadow Acres Phases I & II and South Laredo Phases I & II. Meadow Acres Residential Complex was finished in 1983. It is made up of 78 single-family homes. Phase I contains 38 units and Phase II includes 40 units. South Laredo Phase I was completed in 1987 and Phase II was completed in 1993. Each development contains 36 units and 20 units, respectively, for a total of 56 single-family homes.

Meadow Acres is located on 1641 E. Elm Loop. It is bordered by N. Meadow Ave. to the east, the City of Laredo Cemetery to the north, Nixon High School to the west, and E. Plum St. to the south.



Figure 65 - Meadow Acres Phases I & II

South Laredo I is located on 3501 S. Arkansas Ave. It is bordered Ireland St. to the north, S. New York Ave. to the west, and Las Lomas Del Sur Blvd. to the south.



Figure 66 - South Laredo Phases I

South Laredo II is located on S. Milmo Ave. It is bordered by S. Martin Ave to the east, Farm Labor to the north, and Saltillo St. to the south.

DATA LAVER

X Predominant Racial or Ethnic
Group
Source Century
Source Century
Source Century
Source Century
Source Century
Shaded by Block Group, 2010
Block Group, 2010
White 500%
White 500%
White 500%
Black 500%
Black

Figure 67 - South Laredo Phases II

AMP 6 is made up of the Asherton Development and was acquired by LHA until 2006. It is made up of 32 single-family homes. Asherton is located on 12th Cleveland St., Asherton, TX. It is bordered by Cleveland St. to the north and undeveloped land to the east and south.

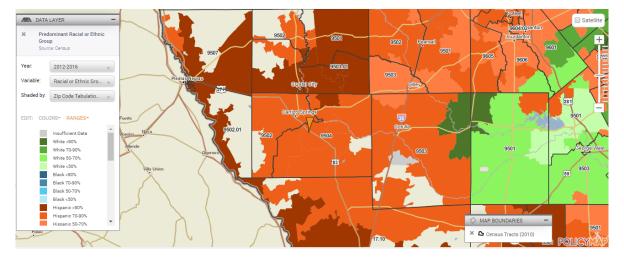


Figure 68 - Asherton Development

All publicly supported housing is located in concentrated areas of ethnic and racial poverty as identified by HUD mapping and data tools. It is important to also note that more than 95% of the City of Laredo's population is Hispanic. Demographic composition of the publicly supported housing varies by the type of program. There is not current data that can identify the demographic composition of public housing facilities.

As reported by the Laredo Housing Authority, the Rental Assistance Demonstration ("RAD") from HUD has approved participation through the Laredo Housing Facilities Corporation to convert Russell Terrace into a RAD project. All 200 units will eventually move from Public Housing based assistance to Project Based Voucher assistance. In the

process, 132 units will be demolished and rebuilt with modern amenities. Tenants who resided there before the conversion process will have the "Right to Return" after the demolition and rebuilding has been completed.

Publicly supported housing in the City consists of nine properties that serve seniors citizens and families with children. Because Laredo is not racially or ethnically diverse there are no developments that are primarily occupied by one Race/Ethnicity over another race.

Fair Housing Enforcement, Outreach Capacity, and Resources

The Federal Fair Housing Act refers to Title VIII of the Civil Rights Act of 1968. This Act, in addition to the Texas Fair Housing Act, protects individual's right to rent an apartment, buy a home, obtain a mortgage, or purchase homeowners insurance free from discrimination based on: race, color, national origin, religion, sex, familial status, and disability.

Typically, fair housing services for renters and homebuyers include the investigation and resolution of housing discrimination complaints, discrimination auditing/testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Tenant/landlord counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities.

Every year, the National Fair Housing Alliance releases a report on trends in fair housing, including the most recent data on reported instances of housing discrimination in America. The **2017 Fair Housing Trends Report**, provides a detail history of policies and practices of segregated communities and explores alternatives to combat housing discrimination. The report also provides recent data on fair housing complaints from private fair housing centers, Department of Justice (DOJ), HUD, and Fair Housing Assistance Program (FHAP) agencies. Highlights of this data include:

- A total of 28,181 complaints of housing discrimination were reported in 2016.
- 55 percent of the complaints reported involved discrimination on the basis of disability, followed by 19.6 percent based on racial discrimination and 8.5 percent based on discrimination against families with kids (familial status).
- 91.5 percent of all acts of housing discrimination reported in 2016 occurred during rental transactions.

Disability-based discrimination is easier to detect because it is typically blatant and as such is reported at higher levels than other types of discrimination, which occur more subtly and are less often recognized.

Fair Housing Agency Complaints

HUD's Office of Fair Housing and Equal Opportunity (FHEO)

Complaints alleging housing discrimination can be filed at the Federal and State level. At the Federal level complaints can be filed with the HUD Office of Fair Housing and Equal Employment Opportunity (FHEO). FHEO administers the Fair Housing Assistance Program (FHAP) which awards and manages the Fair Housing Initiatives Program grants and proposes fair housing legislation. Complaints can be submitted to the central HUD office or to regional field offices located in each state.

Individuals who believe they are victims of housing discrimination can choose to file a fair housing complaint through the respective Regional FHEO. Typically, when a complaint is filed with the agency, a case is opened and an investigation of the allegations of housing discrimination is reviewed.

If the complaint is not successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a "Determination", as well as a "Charge of Discrimination", and a hearing is scheduled before a HUD administrative law judge. Either party [complainant or respondent] may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in Federal court.

HUD's Fort Worth Regional Office of Fair Housing and Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. From January 1, 2007 to December 31, 2017, within the City of Laredo, 20 such complaints originated. Disability was the most common basis with 14 of the 20 (70 percent) complaints filed in Laredo during this period and national origin was the second most common at 15 percent of complaints.

Filed Cases by Basis –Laredo, Texas January 1, 2007 to December 31, 2017

Bases for Discrimination	Number of Complaints	Percent
Disability	14	70%
Race	1	5%
Retaliation	0	0%
National Origin	3	15%
Sex	0	0%
Color	0	0%
Familial Status	2	10%
Total	20	100%

Table 17: Source: *HUD Office of Fair Housing and Equal Opportunity*

Below is the number of Laredo cases completed by resolution type from January 1, 2007 through December 31, 2017.

Laredo Cases Completed January 1, 2007 to December 31, 2017, by Resolution Type

Closure Reason	Number of Complaints	Percent		
Complainant failed to cooperate	2	10%		
No cause determination	5	25%		
Conciliation/settlement successful	7	35%		
Complaint withdrawn by complainant after resolution	6	30%		
Complaint withdrawn by complainant without resolution	0	0%		
Unable to locate complainant	0	0%		
Unresolved	0	0%		
Total	20	100%		
Table 18: Source: HUD Office of Fair Housing and Equal Opportunity				

The pattern of fair housing complaints filed with the regional HUD office mirrors the pattern of complaints filed with local and state Human Relations Commissions. Disability tends to be the most frequent bases for complaints filed in Laredo. Disability is likely to continue as a major basis for discrimination complaints given the age of the housing stock and the aging of the baby boom cohort, which may lead to increased demands for wheelchair accessibility and other modifications in existing residential units.

The Texas Workforce Commission (TWC)

The Texas Workforce Commission ("TWC") is the entity responsible for enforcing the Fair Housing Act in the State of Texas. Complaints are received up to one year after an alleged violation. TWC accepts complaints via email, fax, hand delivery, online, or mail. A Freedom of Information Request (FOIA) was submitted to TWC for all fair housing complaints from January 1, 2007 through December 31, 2017. TWC responded that the City of Laredo did not have any on-going, pending, or completed fair housing complaints from 2007 through 2017.

The Civil Rights Division of the Texas Workforce Commission also offers a variety of comprehensive, interactive presentations and training programs to provide housing providers with a practical understanding of the U.S. and Texas Fair Housing Acts and rules

and how to comply. The TWC provides presentations or training on-site through webinar or phone, at minimal costs.

Section 504 Compliance

Section 504 of the Federal Rehabilitation Act of 1973 prohibits discrimination based on disability in any program receiving Federal financial assistance. This includes provisions for providing reasonable modifications in all rules, policies, and procedures. Programs must be readily accessible to and useable by individuals with disabilities. Major alterations or construction of dwelling units must provide at least 5 percent of units accessible to people with mobility impairments and at least 2 percent of units accessible to people with visual or hearing impairments. There were no recorded Section 504 complaints filed for Laredo from January 1, 2017 to December 31, 2017.

Hate Crime Data

Fair housing violations due to hate crimes occur when people will not consider certain neighborhoods, or have been run off from their homes for fear of harassment or physical harm. To a certain degree, hate crimes can also be an indicator of discrimination. The Texas Hate Crimes Act, Chapter 411.046 of the Texas Government Code, defines hate crimes as crimes that are motivated by prejudice, hatred, or advocacy of violence including, but not limited to, incidents for which statistics are or were kept under Public Law 101-275 (the Federal Hate Crimes Statistics Act). The federal law further defines Hate Crime as crimes that manifest evidence of prejudice based on race, ethnicity, sexual orientation, religion, disability, gender and gender identity. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation (FBI) Hate Crime Statistics Program collects statistics on these incidents.

A review of the data available through the Hate Crime Statistics Program between 2012 through 2016 Program revealed there were no incidents of hate crimes in Laredo in the last five years.

Impediments & Suggested Actions

The requirements for affirmatively furthering fair housing are long-standing components of HUD's housing and community development programs. Entitlement jurisdictions that receive funds from HUD, such as, the City of Laredo are required to execute certification to affirmatively furthering fair housing in its Five-year Consolidated Plan and Annual Action Plan. The HUD AFFH requirements encompasses the following elements:

- Conduct an Analysis of Impediments to Fair Housing Choice;
- Take actions to remedy impediments, if impediments are identified;
- Maintain records of the analysis and actions taken.

The Analysis of Impediments not only identifies impediments to fair housing choice, but also makes recommendations to overcome the effects of those impediments and will serve as the basis for fair housing planning, providing essential information to staff, policy makers, housing providers, lenders, and fair housing advocates, and assisting with garnering community support for fair housing efforts.

The 2018 Analysis of Impediments for the City of Laredo revealed several impediments to fair housing choice. The key issues identified below are accompanied by suggested actions the City will implement in order to alleviate these impediments. These actions were designed to offer greater housing choice to the protected classes frequently experiencing discrimination in the housing market throughout the City of Laredo.

Impediment: Lack of Available Housing Units

Lack of affordable housing exacerbates housing discrimination. Many communities are experiencing a tight housing market, allowing landlords to be highly selective in tenant selections which may disguise some illegal discrimination. Tight housing markets sometimes relates to landlords not taking care of the physical condition of their housing unit. Lack of available housing units based on number of bedrooms is also problematic. The development of new housing is expensive and costs continue to outpace increases in income. Housing development in rural areas is often more difficult due to lower income and higher development costs due to remoteness and lack on contractors and suppliers. The middle fifty percent of household incomes are often in a limbo were their income is too much to qualify for vouchers and housing assistance, yet not enough to support their family at full market rents. This is compounded with the family size trending larger and multigenerational families living together than past populations, increasing the need for larger three plus bedroom housing units throughout Laredo.

Continued access to funding is vital for development of new housing and rehabilitation of existing housing. Educational efforts are needed to understand the importance of affordable housing in every community.

Action Steps:

- 5. Increasing availability of affordable and habitable housing units provides individuals and families with choices allowing them the ability to find housing units that are suitable and affordable.
- 6. The City of Laredo will continue to evaluate the effectiveness of its financial resources with the goal of increasing production of affordable housing and search for opportunity for additional funding to help alleviate the vulnerable position of underserved households seeking housing opportunity.
- 7. Consider set-aside of funds or program changes that effectively support housing development in rural areas.
- 8. Continue to work with local nonprofit housing organizations to allocated federal funding for rehabilitation of existing housing units and ability to change ownership of vacant and abandoned homes throughout the City.

Impediment: Lack of Fair Housing Education

Lack of knowledge and education often hinders success for both renters and homeowners. Many individuals are aware of fair housing protections but don't clearly understand them or how to recognize or address potential discrimination when it occurs. In addition, many renters and homeowners have not been exposed to or learned basic life skills, budgeting, how to maintain their property or what is expected with landlord/tenant or lender/borrower relationships.

Through the public survey and public meetings it was noted that there is a need for additional education. Education for renter's responsibilities, maintaining your property, and fair housing were the topics of interest. Survey results indicated over 85 percent of survey respondents in Laredo had never experienced discrimination. Furthermore, only 20 percent of responded stated they knew where to file a complaint if they had been discrimination against. While the majority of survey respondents noted they had never experience discrimination this high percentage could be attributed to their lack of knowledge of the laws regarding fair housing discrimination.

The fair housing education and outreach arena is primarily covered by various federally funded fair housing organizations, including the Texas Workforce Commission Civil Rights Division and the Office of Fair Housing and Equal Opportunity. It is unclear whether the current fair housing organizational work directly relates to the number of fair housing complaints filed with enforcement agencies. However, it is important to note that while enforcement agency caseloads may not appear high, numerous fair housing cases are settled or resolved through advocacy outside of administrative enforcement, including through the HUD funded programs such as the Fair Housing Initiative Programs (FHIP), fair housing education training is vital for increasing awareness in a community in which discriminatory practices are occurring.

Awareness and education are ways to offset NIMBYism, spreading community success stories and developing awareness of what is fair housing should help to alleviate the impediment. All protected classes are expected to benefit from this activity but especially those who are most disproportionately impacted by discrimination, persons with disabilities households with familial status, and those of lower income.

Action Steps:

- 1. Increasing the opportunity for individuals and agencies to learn important aspects of housing to increase opportunity for success.
- 2. Provide additional fair housing trainings for tenant groups, Laredo Housing Authority clients, human service agencies, multi-cultural organizations, realtors, lenders, in addition to other targeted groups.

Impediment: Economic Issues Affect Housing Choice

There is a lack of economic opportunities in the City which prevents lower income households from increasing their income and ability to live outside areas with concentrations of low-income households, which makes this a fair housing concern. Housing segregation by class tends to impact how people live and affects every aspect of their lives—their quality of life, access to transportation, employment opportunities, access to decent health care, and, perhaps most important, access to good schools.

Action Steps:

- 1. Strengthen partnerships and program delivery that will enhance the City's business base, expand its tax base, and create a more sustainable economy for all residents and businesses.
- 2. Support and enhance workforce development and skills training that result in a "livable" wage and increases job opportunities.

- 3. Support programming that enhances entrepreneurship and small business development, expansion, and retention within impacted areas and high poverty neighborhoods.
- 1. Support the expansion of existing businesses that will create new job opportunities for the unemployed and underemployed.

Impediment: Racially/Ethnically Concentered Areas and Impact on Opportunity

Racially/ethnically concentrated areas of poverty ("impacted areas") have suffered from disinvestment and face challenges in providing housing choice that offers meaningful access to opportunity. Neighborhoods in Laredo that are identified as "areas of concentrated poverty," strongly correlate with areas of racially/ethnically concentrated poverty due to historical segregation and inequities, typically lack the professional, social, health, and safety opportunities found in communities with greater financial resources. Such opportunities would not likely exist unless otherwise stimulated through investments.

For example, areas of the City that have higher percentage of owner-occupied units and characterized as predominantly White have both a smaller percentage of families with children, and a higher index of access to proficiency schools, compared to other areas. On the other hand, other racial/ethnic groups such as Blacks, Hispanics, Asians, tend to live in areas of the City where there are high number of aging renter-occupied units and have either moderate or low access to proficient schools according to the access to School Proficiency Index provided by HUD. Comparatively, Laredo's Job Proximity Index categories at the City level revealed White, Asian, and Native American populations have scores above 55, indicating homes in closer proximity to work places than those of Black and Hispanic populations, which show scores of 52.10 and 46.11, respectively. Additionally, access to the downtown transit center and the Mall de Norte is somewhat limited for Laredo residents as well as transportation to the bridge to Nuevo Laredo.

Action Steps:

- 1. Improved evaluation and funding criteria for housing investments in areas in need of comprehensive neighborhood revitalization.
- 2. Sustain and enhance a commitment to invest in high poverty areas to increase community revitalization in low-income areas.
- 3. Examine, with input from local partners, how to best measure and evaluate the extent to which neighborhood revitalization actually occurs as a result of housing investment in concert with a revitalization plan.

