

Fair Housing Activity Statement – Texas

Recognizing that each jurisdiction is unique, this Fair Housing Activity Statement - Texas is intended to be used in conjunction with the Analysis of Impediments, Phase I as a form to help the applying jurisdictions perform assessments of their impediments to fair housing choice, plan actions to address identified impediments, and communicate their plans to the State of Texas and HUD.

BEFORE beginning to fill out this form, each jurisdiction should:

- (1) Participate in the regional FFAST Form training.
- (2) Review the 2010 Texas Interim Phase I AI in detail;
- (3) Gather relevant information (see instructions in Appendix A);
- (4) Convene a FFAST Working Group to assess the data collected in #2 and fill out the FFAST form (see instructions in Appendix A.)

<u>Impediment #1</u>	Protected classes may experience disparities in home mortgage lending and high cost loans.
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No local action is required at this time.

<u>Impediment #2</u>	There is inadequate information available to the real estate community, governments and the public about fair housing requirements and enforcement procedures.
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No local action is required at this time.

Impediment #3

The public is not sufficiently aware of their Fair Housing rights and how to obtain the assistance necessary to protect those rights.

1. Consistent with the Fair Housing Act, the State of Texas, and funded sub-recipients should continue to promote and conduct events to celebrate April as Fair Housing Month, and direct sub-recipients to do the same. These events can demonstrate support for fair housing and build awareness.

☒ We will commit to undertake Fair Housing Month activities. (Check all that apply.)

☒ Passage of a resolution by our governing body.

☐ Activities in schools.

☒ Placing posters in public buildings.

☒ Governing body will hold a special hearing to solicit input from the community.

☒ Other. Please specify.

The City of Shoreacres has passed a resolution (#2011-68) by our governing body. Our city has FHA/HUD information available at City Hall, the City Website, and we will send information in each resident's water bill in the month of April. There are no schools located within our city.

Please refer to Appendix B for Resolution 2011-68

When will you undertake these activities? ☒ 2011 ☐ 2012 ☐ 2013

☐ Not Applicable (Explain)

2. Consistent with the Fair Housing Act, the State of Texas and funded sub-recipients have historically conducted fair housing activities at various times of the year and should continue to fund, depending on sufficient appropriations, or collaborate with public and private agencies, organizations and groups to plan and conduct fair housing activities.

☒ We will conduct/sponsor/fund in fair housing activities at various times of the year other than "April as Fair Housing Month". Attach a description of these activities and identify the organizations and agencies you have worked with.

When will you do this? ☒ 2011 ☐ 2012 ☐ 2013

The City participates at annual events held at our local parks such as National Night Out and BBQ Cook Offs. We will make information available at the city booth located at each of these events.

☐ Not Applicable (Explain)

Impediment #4

"Not in my Backyard" (NIMBY) may be an impediment to fair housing in Texas communities.

1. NIMBY opposition needs to be anticipated and planning and outreach should occur on the front end of projects. To mitigate defensive and reactive responses, planning should include strategies for education, outreach and marketing that provide accurate information and promote the positive aspects and benefits of affordable housing to build support among community residents.^[1]
2. The Department of Housing and Urban Development (HUD) provides extensive information about Fair Housing and examples at www.hud.gov. Generally communities should consider:
 - Working with local officials, editorial boards, religious and civic organizations and other community leaders to initiate education programs.
 - Seeking opportunities to present information to community organizations by requesting to be placed on their meeting agendas.
 - Including a visit to the Group Home residence as part of an education program.
 - Answering all questions.
 - Talking with local neighborhood leaders, including elected representatives, and setting up a neighborhood meeting.
 - Setting up a liaison committee consisting of advocates, group residents, and neighborhood residents to discuss issues.
 - Identifying areas that meet AFFH targets where the community supports development, has worked with community groups and potentially uses funds to assist the development of multi-family affordable housing.

- ☐ We have developed an anti-NIMBYism action plan. [Attach a copy or description]
- ☒ We will develop an anti-NIMBYism action plan. [Designate who will be responsible for developing this plan.]

When will you do this? ☐ 2011 ☒ 2012 ☐ 2013

The appointed FFAST committee is designated for developing this plan in 2012.

- ☐ Not Applicable (Explain)

Impediment #5

Certain governmental policies and practices may not meet current HUD policy concerning affirmatively furthering fair housing. Jurisdictions should act to ensure that their policies and procedures affirmatively further fair housing, address mal-distribution of resources, and that they do not unnecessarily impact housing choice.

1. As part of certifying that a community is affirmatively furthering fair housing, jurisdictions that have long-term infrastructure plans should review them to determine if the plan promotes racial concentrations or otherwise inadvertently results in disparate treatment of members of protected classes. While not intended to direct a community to hire a consultant, it is anticipated that a community will review its long-term infrastructure plans as part of this recommended action. In reviewing the project list (Appendix F of the Phase 1 AI) there are many projects that are listed as being of community-wide benefit. The records do not indicate the actual location of projects or provide adequate discussion of how the projects benefit the entire community.

- ☒ We have a long-term infrastructure plan and will review the plan to determine if it promotes racial concentrations or otherwise inadvertently results in disparate treatment of members of protected classes as it relates to the availability of housing.

When will you do this? ☐ 2011 ☒ 2012

- ☐ Not Applicable (Explain)

- ☒ We have already collected information on the locations of protected populations and have adequate information for insuring that new projects with "citywide benefits" will not perpetuate illegal differences in treatment.

Please refer to Appendix A for: US Census Bureau: General Housing Characteristics – 2010, US Census Bureau: Profile of General Population and Housing Characteristics – 2010, ESRI: Demographic and Income Profile, City of Shoreacres: Infrastructure Project Maps

- ☐ We will use the information in the AI to ensure that proposed projects do not perpetuate illegal differences in treatment.

When will you do this? ☐ 2011

- ☐ Not Applicable (Explain)

2. As it has been determined under federal law that Fair Housing applies to all federal housing and community development funds, to reduce “siloing” the fair housing component into only housing-related programs, fair housing should be considered in all activities for all local community planning staff.

- ☐ We have determined that consideration of Fair Housing implications has already been incorporated into all aspects of planning in this jurisdiction. [Please attach supporting documentation.]
- ☒ We will review and insure that Fair Housing implications are addressed in all aspects of planning in this jurisdiction in a manner consistent with the guidelines provided by the state at the FFAST form training and maintain documentation of that review.

When will you do this? ☒ 2011 ☐ 2012 ☐ 2013

- ☐ Not Applicable (Explain)

3. It would be beneficial for local elected officials to require senior staff of any subrecipient such as a city or county—including managers and attorneys—to receive available Fair Housing training within the first 12 months of their employment or engagement.

- ☒ We have a policy in place providing for all senior staff – including managers and attorneys – to receive Fair Housing training within their first 12 months on the job, and for long-term senior staff to receive regular updated training. [Attach copy of policy]

Resolution #2011-68. Please refer to Appendix B.

- ☐ We do not have such a policy and will develop and implement one.

When will you do this? ☐ 2011 ☐ 2012 ☐ 2013

- ☐ Not Applicable (Explain)

4. As part of what is usually a common initial training by the associations that provide education opportunities for newly-appointed board members or newly-elected council or commissioners court members of cities and counties, the state should request that training include specific information on the Fair Housing Act—with a discussion of affirmatively furthering fair housing obligations.

No local action is required at this time.

5. Local communities should consider limiting the concentration of infrastructure improvements like wastewater treatment, solid waste disposal, or similar necessary but not desirable infrastructure projects in residential areas where there are concentrations of protected classes.

☒ We have an official policy that limits the concentration of certain infrastructure improvements. [Attach a copy.]

[Resolution #2011-68. Please refer to Appendix B.](#)

☒ We have official policies and procedures that take the location of protected classes into account when deciding where to locate undesirable infrastructure improvements. [Attach a copy.]

[Resolution #2011-68. Please refer to Appendix B.](#)

☐ We do NOT have limits on the concentration of undesirable infrastructure improvements or policies and procedures that take the residential location of members of protected classes into account, but will develop formal limits or official policies and procedures.

When will you do this? ☐ 2011 ☐ 2012 ☐ 2013

☐ Not Applicable (Explain)

6. Communities electing to provide publicly financed housing incentives should be requested to call for recipients to engage in affirmative marketing.

☐ We have a policy requiring Affirmative Marketing Plans from developers seeking tax abatements or other supports for new housing.

☐ We do not have such a policy and will develop and implement one.

When will you do this? ☐ 2011

☒ Not Applicable (Explain)

- [Due to the city's small size, economics, and non-entitlement status](#)
- [The city has not been approached for concessions, however we are willing to consider future opportunities.](#)

7. If a jurisdiction is a non-entitlement community, when working in LMI areas to replace roads or other infrastructure, the jurisdiction should consider making application for additional sources of funding to provide assistance to repair substandard housing associated with the project (i.e., TDHCA or HUD.)

☐ We formally consider accessing supplementary funds when infrastructure proposals are developed. [Attach policies.]

☒ We have not consistently done this in the past and we will develop a process to formally consider making housing funding applications when funds for infrastructure projects are sought.

When will you do this? ☐ 2011 ☒ 2012 ☐ 2013

☐ Not Applicable (Explain)

8. Most infrastructure projects take into account items like curb cuts, sidewalks, hearing and visually impaired indicators at intersections. When approving non-federally funded projects, similar special needs construction should be required for infrastructure improvements. Projects should also address other legacy discrimination issues, such as accessibility in public areas like courthouses, community centers and other high traffic areas.

☒ We currently require that applications for non-federally-funded infrastructure projects are ADA compliant and address other legacy discrimination issues.

Resolution #2011-68. Please refer to Appendix B.

☐ We do not have such a requirement. We will develop one.

When will you do this? ☐ 2011

☐ Not Applicable (Explain)

9. Each jurisdiction applying for Community Development Block Grant funds or other federal housing and community development funds should submit a Fair Housing Activities Statement – Texas (FHAST) with their application, reviewing their infrastructure needs and housing needs and how the proposed activity promotes fair housing or results in more equitable treatment of protected classes. Projects with community-wide benefits should be accompanied by explicit commitments on the part of the local jurisdictions to undertake additional activities to affirmatively further fair housing along with a monitoring and reporting process.

☒ We submit a FHAST form.

When will you begin to do this? ☒ 2011

☐ Not Applicable (Explain)

10. As part of the non-housing disaster recovery program, jurisdictions should consider low-income areas and areas populated principally by members of protected classes to determine the potential for flooding and consider making infrastructure expenditures to help protect the impacted communities—including colonias.

- ☐ We have reviewed LMI areas and areas populated principally by members of protected classes, and prioritized infrastructure expenditures to help protect the impacted communities—including colonias.
- ☒ We have not done this in the past but will conduct such a review and consider these infrastructure projects in the future.

When will you do this? ☐ 2011 ☒ 2012

- ☐ Not Applicable (Explain)

11. If applicable, all policies should be reviewed regarding denying applicants' access to disaster recovery CDBG funds if their residence is located in the flood plain. If the policy does not allow participation by restricting building in flood plains, then the policy should be assessed to see if alternative housing programs could be implemented for the residents. Local jurisdictions should analyze the results and see if protected classes are more frequently harmed by flood plain restrictions. This action does not apply to the GLO CDBG Disaster Relief Fund that limits property purchase "unless TXCDBG receives satisfactory evidence that the property to be purchased was not constructed or purchased by the current owner after the property site location was officially mapped and included in a designated flood plain."

- ☒ We have completed this review and analysis and will take action on our findings.

The City is 100% inside a special flood hazard area (floodplain)

All residence are located in the special flood hazard area. No applicant is denied access to CDBG Disaster Relief Funds. No actions required.

- ☐ We have not completed this review and analysis. We will do so and take appropriate actions based on our findings for Round 2 programs.

When will you do this? ☐ 2011

- ☐ Not Applicable (Explain)

12. When an entire community is in a flood plain, the community should establish clear standards that allow for proper elevation or relocation, and that also allows for visitability/special needs considerations consistent with state^[3] and federal law.

☐ We have established clear standards that allow for proper elevation of homes or for relocation, and also allow for visitability/special needs considerations consistent with state and federal law. [Attach documentation.]

☒ We have not developed these standards but will do so for Round 2 programs.

When will you do this? ☐ 2011 ☒ 2012

☐ Not Applicable (Explain)

[The City accommodates citizens remaining on their property in private RVs or FEMA trailers. Please refer to Ordinances 2008-22, 2008-27, 2009-41 in Appendix C.](#)

13. Local jurisdictions that accommodated the relocation of disaster survivors resulting in concentrations of protected class survivors in specific areas should establish Moving to Opportunity Programs and include renters in their Moving to Opportunity Programs as defined under Round 2.

☐ This action step applies to our jurisdiction. We will establish a Moving to Opportunity Program for disaster survivors as part of our Round 2 housing recovery program.

When will you do this? ☐ 2011

☒ Not Applicable (Explain)

[Hurricane victims were not relocated to the City of Shoreacres.](#)

14. Consistent with the process established in the Conciliation Agreement, local jurisdictions and state agencies should work together to determine a demographic and economic profile of victims of the natural disaster and establish goals for assisting these populations in no less that the proportions they were impacted by the disaster. These goals should be performance goals and disaster recovery funds should be extended incrementally in a manner to ensure that these populations are equitably assisted with benefits.

☒ We will cooperate with state agencies to carry out this action step.

When will you do this? ☒ 2011

☐ Not Applicable (Explain)

^[3] Texas Government Code Section 2306.514

15. All infrastructure programs funded with disaster recovery funds should be designed so that any publicly accessible infrastructure projects and associated facilities are fully accessible to persons with disabilities.

- ☒ We have established clear policies and procedures to insure that all infrastructure programs funded with disaster recovery funds will be designed so that any publicly accessible infrastructure projects and associated facilities are fully accessible to persons with disabilities. [Attach documentation.]

Resolution #2011-68. Please refer to Appendix B.

- ☐ We have not developed these standards and policies; we will do so for Round 2 infrastructure projects. The person or entity responsible for developing these standards will be _____.

When will you do this? ☐ 2011

- ☐ Not Applicable (Explain)

16. Consistent with the Conciliation Agreement, family and elderly public housing units damaged or destroyed by the disaster should be reconstructed or repaired in a manner that affirmatively furthers fair housing utilizing disaster recovery funds within 24 months of approval of the initial application for disaster recovery assistance for the local jurisdiction.

- ☐ We affirm that family and elderly public housing units damaged or destroyed by the disaster will be reconstructed or repaired in a manner that affirmatively furthers fair housing utilizing disaster recovery funds within 24 months of submission of the initial application for disaster recovery assistance by the local jurisdiction.

- ☒ Not Applicable (Explain)

The City has no public housing units.

Impediment #6

Governmental entities at all levels do not appear to have been proactive in the enforcement of both the Fair Housing Act and the obligation to affirmatively further fair housing. The State and subrecipients should implement a robust and effective structure for identifying and pursuing suspected violations.

1. Given the potential for increase in Fair Housing enforcement action by federal and state agencies and private organizations, an ongoing fair housing testing program for areas that receive federal housing and community development funds could be beneficial to protect state agencies and sub-recipients from potential repayment. Fair housing enforcement is a valid use of CDBG funding and can be used to establish testing programs by agencies trained in HUD testing procedures. The state, or local jurisdictions combining together, should consider conducting tests in areas that include the following: steering in sales and rental; the denial of and different terms and conditions based on race, national origin, familial status, and disability in sales and rental; predatory and disparate terms and conditions in lending and insurance; and foreclosure modification schemes targeting minority neighborhoods. The state should also consider education to applicable entities on self-testing and self-correction.

☐ We currently have a testing program for Fair Housing violations. For more information.

☒ We do not have a testing program for Fair Housing violations and plan to establish one.

When will you do this? ☒ 2011 ☐ 2012 ☐ 2013

Due to size of City, it would be difficult to develop a test program on our own.
We will fully cooperate with State and HUD to develop a FHA testing plan.

☐ Not Applicable (Explain)

2. TDHCA should, as a pilot program, allocate funds to independent third parties or a combined jurisdiction team identified in point 1 of this section to provide similar testing to determine if additional enforcement is necessary.

No local action is required at this time.

3. Impacted agencies that provide certification that they are affirmatively furthering fair housing as required by federal law, should consider publishing a public document on enforcement that provides the public and communities with a clear description (and chart) of the state and Federal Fair Housing Act.

☒ On documents concerning housing and community development programs that are provided to the public, we will list fair housing enforcement contacts and procedures consistent with the State suggested language when it is provided in 2011.

When will you do this? ☒ 2011

Resolution #2011-68. Please refer to Appendix B.

☐ Not Applicable (Explain)

4. Each community should place on its website (if one is available) the contact, at the local, state, and federal levels, for reporting a Fair Housing complaint, if citizens believe they were victims of housing discrimination.

☒ We have published the contact information – at the local, state and federal levels – for reporting a Fair Housing complaint. [Attach a copy or URL.]

www.cityofshoreacres.us/fairhousing.htm

☐ We have not done so but will do so.

When will you do this? ☐ 2011

☐ Not Applicable (Explain)

5. Each local jurisdiction should publish on its website a clear statement, approved jointly by TDHCA, expressing the jurisdiction's obligation to affirmatively further fair housing and providing a method for reporting suspected noncompliance to the state and to HUD. The jurisdiction's contact person should be able to refer to clear local Fair Housing procedures for the complaint process, keep logs and records of all inquiries, allegations, complaints and referrals. These reports should be sent to the appropriate funding agency. Where these reports show that a jurisdiction has administered programs inconsistently with the AI and had the effect of discouraging applications from members of protected classes who are deemed eligible under the plan for assistance, affirmative marketing plans should be developed and submitted to the appropriate agency.

- ☒ We have published a policy statement expressing our jurisdiction's obligation to Affirmatively Further Fair Housing. [Attach a copy or URL.]

Resolution #2011-68. Please refer to Appendix B.

- ☐ We will publish a policy statement consistent with the language the State provides in 2011.

When will you do this? ☐ 2011

- ☐ Not Applicable (Explain)

- ☒ We have developed clear procedures for the Fair Housing complaint process. [Attach a copy]

Resolution #2011-68. Please refer to Appendix B.

- ☐ We will develop clear procedures for the Fair Housing complaint process once more guidance is given by the State in 2011.

When will you do this? ☐ 2011

- ☐ Not Applicable (Explain)

- ☒ We keep complete logs and records of all Fair Housing inquiries, allegations, complaints and referrals and have a policy statement about these legal records.

Resolution #2011-68. Please refer to Appendix B.

- ☐ We will begin keeping required logs and records.

When will you do this? ☐ 2011

- ☐ Not Applicable (Explain)

- ☒ We have remedial procedures for developers, landlords, home sellers and others whose actions may be inconsistent with Fair Housing laws and regulations.

Due to the city's small size we will refer possible cases for investigation and remediation to the Greater Houston Fair Housing Center.

- ☐ We do not have remedial procedures but will develop them. The agency or person who will be responsible for developing these procedures is

When will you do this? ☐ 2011 ☐ 2012

- ☐ Not Applicable (Explain)

Impediment #7

Many local jurisdictions have zoning codes, land use controls, and administrative practices that may impede fair housing choice and fail to affirmatively further fair housing.

1. The law anticipates that ordinances creating disparate impact should also be reviewed for change. If a disparate impact is determined to exist by the local jurisdiction, it could repeal or amend the restriction, use public funds to offset the cost through homebuyer assistance programs, or waive fees or other offsets to make the home more affordable.

- ☐ We recently conducted or updated a Fair Housing Review of our ordinances and codes.

- ☒ We have not done so but will conduct a review

- ☐ We have a policy statement/guidance for those responsible for developing codes/ordinances that reminds them to consider and document the Fair Housing/AFFH implications of any new rule.

- ☒ We do not have such a policy/guidance but will develop one when suggested guidelines are provided by the State in 2011.

When will you do this? ☐ 2011 ☒ 2012

- ☐ Not Applicable (Explain)

2. To help limit concentrations that could be considered impediments to affirmatively furthering fair housing, jurisdictions that have long term planning documents for housing growth or redevelopment, or revitalization plans, should consider allowing or encouraging mixed income affordable housing in the plan and provide incentives for development of this type of housing in areas that are not concentrated.

☐ We recently conducted a Fair Housing Review and took/are taking appropriate action concerning our planning documents. [Attach a list of plans reviewed, a summary of findings, and actions you will take to remove impediments]

☒ We have not done so but will conduct a Fair Housing Review after the State provides suggested guidelines in 2011.

When will you do this? ☐ 2011 ☒ 2012

☐ Not Applicable (Explain)

☐ We have identified residential areas that show concentrations or underrepresentation of protected groups, and we encourage mixed-income affordable housing and other strategies to widen housing choice throughout our jurisdiction.

☒ We have not done so but will include this in our FFAST plan once guidelines are provided by the State in 2011.

When will you do this? ☐ 2011 ☒ 2012 ☐ 2013

☐ Not Applicable (Explain)

3. Local jurisdictions seeking CDBG Disaster Recovery funds from the state should consider offering expedited permitting and review processes for affordable housing projects within high opportunity target zones.

☒ We currently offer incentives to developers to locate affordable housing projects in high opportunity neighborhoods and prevent overconcentration.

We are a small city and our permit process is less than 2 weeks.

☐ We have not done so but will.

When will you do this? ☐ 2011 ☐ 2012 ☐ 2013

☐ Not Applicable (Explain)

Impediment #8

Inadequate planning for re-housing after an emergency situation creates a situation where persons who are uninsured or under-insured, low income, or special needs can be displaced for long periods of time.

1. Some legislators, the Sunset Commission, and communities acknowledge that while temporary disaster housing is a federal program, Texas should continue to provide guidance to local governments on additional planning that needs to be done as part of the emergency preparedness planning to most efficiently work with FEMA.

No local action is required at this time.

2. As much of what FEMA has previously offered is travel trailers or manufactured housing, local governments should review their zoning requirements or other land use provisions that restrict temporary housing or housing on an existing lot during the building process and look at potential waivers that do not risk or negatively impact health, safety, and welfare during a period after disasters so that low income persons can move back to their existing communities with temporary housing while waiting for redevelopment.

- ☒ We have reviewed our zoning requirements and other land use provisions and have provided waivers or other accommodations for post-disaster housing.

Please refer to Ordinances 2008-22, 2008-27, 2009-41 in Appendix C.

- ☐ We have not done so but will review our zoning and look at potential waivers.

When will you do this? ☐ 2011 ☐ 2012 ☐ 2013

- ☐ Not Applicable (Explain)

Impediment #9

There are impediments in public and private actions and private attitudes to housing choice for persons with disabilities.

1. To meet federal Fair Housing requirements for zoning and neighborhood uses, jurisdictions should look to determine if there are direct or indirect limitations in codes that would prevent facilities or personal residences from providing assistance or communities of choice or service-enriched environments that directly impact special needs persons.

City Administrator Letter of Review. Please see Appendix D.

2. Local jurisdictions should work to ensure that zoning or code requirements do not unnecessarily impose stricter commercial building requirements, such as emergency access or protection services, on group homes, thereby dramatically increasing housing costs for persons with special needs.

- ☒ We have reviewed our codes and ordinances and have addressed/are addressing any impediments relating to special needs persons, including (1) rules that might prevent facilities or personal residences from providing assistance or communities of choice or service-enriched environments that directly impact special needs persons, and (2) rules that might unfairly increase the costs to special needs persons.

City Administrator Letter of Review. Please see Appendix D.

- ☐ We have not done so but will conduct a review and address any impediments identified once guidelines are provided by the State in 2011.

When will you do this? ☐ 2011

- ☐ Not Applicable (Explain)

3. Local jurisdictions should consider coordinating with the legislatively created Housing and Health Services Coordination Council for best practices on working with supportive services.

- ☒ We agree to coordinate with the legislatively created Housing and Health Services Coordination Council staffed by TDHCA for best practices on working with supportive services.

When will you do this? ☐ 2011 ☒ 2012 ☐ 2013

- ☐ Not Applicable (Explain)

Impediment #10

There are barriers to mobility and free housing choice for Housing Choice Voucher holders including: inadequate tenant counseling services and mobility assistance, failure of PHAs to apply for the FMR pilot demonstration funds, and government policies, procedures, and regulations that tend to decrease participation by private housing providers and to restrict available housing to "racially or low-income populated neighborhoods" with little access to economic, educational, or other opportunity.

No local action beyond compliance with Round 2 Housing Guidelines is currently required but communities are encouraged to work with local public housing authorities to understand and overcome these impediments.

Impediment #11

Loss of housing stock in Hurricanes Dolly and Ike compounded the shortage of affordable housing in disaster recovery areas. This shortage is particularly acute in safe, low-poverty neighborhoods with access to standard public services, job opportunities and good schools.

No local action is required at this time. TDHCA will develop a statewide strategic plan including guidance for local jurisdictions on the following Action Steps in 2011.

1. To help offset the costs of developments that feature reduced rents without government support, local jurisdictions should consider establishing density bonuses to allow for higher levels of units per site for multifamily developments and single-family developments that propose increased affordability.
2. TDHCA and HUD have developed programs that preserve affordable housing. Continuing in this vein, the state and local jurisdictions should work to preserve existing affordable housing development and discourage them from converting to market rate housing. Requirements should be included in all publicly funded developments providing tenants with early and clear notification of the intention of management to convert to market rate housing and providing first right of refusal to nonprofit and public entities and organizations to purchase units to maintain affordability.
3. The state and local jurisdictions should consider using CDBG funds to buy down the cost of land in high-cost and high-opportunity development areas to increase affordable housing options in these areas.

Impediment #12

Lack of financial resources for both individuals and housing providers limits Fair Housing choice. Using an effective program under Section 3 of the Housing and Urban Development Act of 1968 may help members of protected classes gain economic opportunities necessary to allow them to exercise fair housing choice.

1. The state is maximizing its resources in Round 2 of the Ike/Dolly funding to affirmatively further fair housing in single family and multi-family developments. As called for in the Conciliation Agreement, the state is looking to provide more integrated housing options for persons in racially concentrated or poverty concentrated neighborhood groups. In single-family programs, the state should require subrecipients to offer the opportunity to relocate out of floodplain areas, concentrations of racial minorities, or concentrations of poverty—through the Homeowner Opportunity Program. Any relocation should be into an area that does not result in simply relocating the high-concentration from one area to another.

Local jurisdictions will be responsible for complying with Section 3 as part of their contract with the state.

2. Jurisdictions receiving federal funds from HUD, directly or indirectly, should ensure they have a compliant Section 3 program to meet HUD requirements regarding notification to LMI eligible persons of potential job creation at the impacted neighborhood level with federal funds.

☐ We have in place a Section 3 program that meets the requirements of federal law and regulations regarding potential job creation at the impacted neighborhood level and the use of federal funds to hire local LMI eligible persons. We confirm that appropriate staff persons in this jurisdiction have already received training on Section 3, regarding job creation for local LMI persons including members of protected classes. [Attach Section 3 plan and list of staff names and training dates]

☒ We have not done so but will develop a Section 3 program that meets the requirements of federal law and regulations and that ensure appropriate staff receive training.

When will you do this? ☒ 2011

Impediment #13	Location and lack of housing accessibility and visitability standards within political jurisdictions limits fair housing choice for persons with disabilities.
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1. Local jurisdictions should consider establishing incentives for affordable housing applicants to create an increased set-aside of housing units for persons with disabilities or persons who are elderly without violating the existing TDHCA integrated housing rule.
2. TDHCA and local jurisdictions should consider adding proximity to medical facilities as a scoring incentive for competitive programs using federal funds for proximity to medical facilities.
3. TDHCA should require that all federally funded housing construction be built to accessibility standards found in Texas Government Code §2306.514.

☐ We have formally considered: 1) establishing incentives for affordable housing developers to create an increased set-aside of housing units for persons with disabilities or persons who are elderly without violating the existing TDHCA Integrated Housing Rule; 2) providing point incentives for units in proximity to medical facilities for competitive programs using federal funds; and 3) requiring new housing built with federal funds to be built with structures that allow for accessible features, regardless of whether the original occupant needs the features, as called for by state law. [Attach documentation of the review and resulting actions.]

☒ We have not undertaken the above review, but plan to do so.

When will you do this? ☐ 2011 ☒ 2012 ☐ 2013

☐ Not Applicable (Explain)

Impediment #14

Many colonias residents live in developments that have insufficient infrastructure and protections against flooding and are impacted by flooding beyond events like Hurricanes Dolly and Ike.

1. The state, COGs, and local jurisdictions should examine the infrastructure needs in colonias, in particular the use of CDBG disaster recovery funds to provide drainage improvements to correct flooding problems in the wake of Hurricane Dolly, and the historical provision of public infrastructure and housing assistance to meet those needs in border and non-border colonias.

- ☐ We have identified the unserved infrastructure needs of colonias within our jurisdiction and whether these infrastructure improvements are eligible for disaster recovery funding and, if so, whether those projects will be funded.
- ☐ We have not undertaken the above review, but plan to do so.

When will you do this? ☐ 2011

☒ Not Applicable (Explain)

Based on data available (such as GIS mapping, Census tract, Harris County Damage Assessment Report, Harris County Appraisal District information and personal knowledge of our citizenship) there are no area specific concentrations of LMI. 17% of the population is LMI but they are dispersed throughout the community.

Please refer to Appendix E.

Impediment #15

Minority neighborhoods in disaster areas are primarily served by non-regulated insurance companies that do not adhere to underwriting guidelines and may be discriminated against in the provision of insurance. Texas has passed aggressive statutes to prevent insurance "redlining." National research indicates that protected classes face unwarranted disparities in the cost of insurance, the amount of coverage, and cancellation of policies without notice to the homeowner.

No local action is required at this time.

Impediment #16

Many jurisdictions do not have adequate Analysis of Impediments to Fair Housing or Fair Housing Plans, and do not keep sufficient records of their activities.

1. Recipients of CDBG funds from HUD for housing should maintain records as required by the Fair Housing Act, HUD regulations, and the Conciliation Agreement in order to document that they are carrying out their commitments and affirmatively furthering fair housing.

- ☒ We currently maintain all required records to document our AFFH actions and compliance with Fair Housing laws, HUD and State regulations, and the Conciliation Agreement. [Attach details of the records now kept and identify the person or entity responsible for keeping these records.]

Resolution #2011-68. Please refer to Appendix B.

- ☐ We have not done so but do so in compliance with GLO guidance.

When will you do this? ☐ 2011 ☐ 2012 ☐ 2013

- ☐ Not Applicable (Explain)

2. As required under the Conciliation Agreement, the State will conduct a new Statewide AI after HUD approval of the Phase 1 AI. Entitlement communities should conduct new AIs or update current AIs to ensure that they address all recommended data and issues and specifically address issues related to all protected classes under the Fair Housing Act. Race and national origin, as well as the other protected classes, must be identified independent of low and moderate-income categories in order to understand the impact of actions, practices, regulations, ordinances, and other factors on them.

- ☐ We recently completed a formal Analysis of Impediments, are currently updating an existing AI, or are conducting our first AI. [Attach most recent AI or draft.]

- ☒ We are using the FFAST form process to analyze our impediments to fair housing and plan how to address them.

When will you do this? ☒ 2011

- ☐ Not Applicable (Explain)

Alternative or additional Local Action Steps developed by this jurisdiction: To address unique impediments to fair housing within each community, local jurisdictions are encouraged to develop alternative action steps to be adopted in lieu of or in addition to those set out in the State of Texas Interim Analysis of Impediments to fair housing. If your jurisdiction elects to propose alternative or additional action steps, please describe them below.

☐ We plan to take additional Action Steps, described in an Attachment.

☒ We will not take additional FH Action Steps at this time.

When will you do this? ☐ 2011 ☐ 2012 ☒ 2013

After implementing other action steps committed to as stated throughout this FHAST form, we'll evaluate the need for alternative or additional Local Action Steps.

☐ Not Applicable (Explain)

Appendix A

- US Census Bureau: General Housing Characteristics – 2010
- US Census Bureau: Profile of General Population and Housing Characteristics – 2010
- ESRI: Demographic and Income Profile
- City of Shoreacres: Infrastructure Project Maps



QT-H1

General Housing Characteristics: 2010

2010 Census Summary File 1

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see <http://www.census.gov/prod/cen2010/doc/sf1.pdf>.

GEO: Shoreacres city, Texas

Subject	Number	Percent
OCCUPANCY STATUS		
Total housing units	632	100.0
Occupied housing units	559	88.4
Vacant housing units	73	11.6
TENURE		
Occupied housing units	559	100.0
Owner occupied	503	90.0
Owned with a mortgage or loan	356	63.7
Owned free and clear	147	26.3
Renter occupied	56	10.0
VACANCY STATUS		
Vacant housing units	73	100.0
For rent	2	2.7
Rented, not occupied	1	1.4
For sale only	14	19.2
Sold, not occupied	0	0.0
For seasonal, recreational, or occasional use	7	9.6
For migratory workers	0	0.0
Other vacant	49	67.1
TENURE BY HISPANIC OR LATINO ORIGIN OF HOUSEHOLDER BY RACE OF HOUSEHOLDER		
Occupied housing units	559	100.0
Owner-occupied housing units	503	90.0
Not Hispanic or Latino householder	440	78.7
White alone householder	422	75.5
Black or African American alone householder	6	1.1
American Indian and Alaska Native alone householder	5	0.9
Asian alone householder	3	0.5
Native Hawaiian and Other Pacific Islander alone householder	0	0.0
Some Other Race alone householder	0	0.0
Two or More Races householder	4	0.7
Hispanic or Latino householder	63	11.3
White alone householder	46	8.2
Black or African American alone householder	1	0.2
American Indian and Alaska Native alone householder	2	0.4
Asian alone householder	0	0.0
Native Hawaiian and Other Pacific Islander alone householder	0	0.0
Some Other Race alone householder	13	2.3
Two or More Races householder	1	0.2
Renter-occupied housing units	56	10.0
Not Hispanic or Latino householder	47	8.4
White alone householder	43	7.7
Black or African American alone householder	0	0.0

Subject	Number	Percent
American Indian and Alaska Native alone householder	1	0.2
Asian alone householder	0	0.0
Native Hawaiian and Other Pacific Islander alone householder	0	0.0
Some Other Race alone householder	0	0.0
Two or More Races householder	3	0.5
Hispanic or Latino householder	9	1.6
White alone householder	6	1.1
Black or African American alone householder	0	0.0
American Indian and Alaska Native alone householder	1	0.2
Asian alone householder	0	0.0
Native Hawaiian and Other Pacific Islander alone householder	0	0.0
Some Other Race alone householder	2	0.4
Two or More Races householder	0	0.0

X Not applicable.

Source: U.S. Census Bureau, 2010 Census.

2010 Census Summary File 1, Tables H3, H4, H5, and HCT1.



DP-1

Profile of General Population and Housing Characteristics: 2010

2010 Demographic Profile Data

NOTE: For more information on confidentiality protection, nonsampling error, and definitions, see <http://www.census.gov/prod/cen2010/profiletd.pdf>.

GEO: Shoreacres city, Texas

Subject	Number	Percent
SEX AND AGE		
Total population	1,493	100.0
Under 5 years	68	4.6
5 to 9 years	81	5.4
10 to 14 years	102	6.8
15 to 19 years	108	7.2
20 to 24 years	71	4.8
25 to 29 years	71	4.8
30 to 34 years	88	5.9
35 to 39 years	92	6.2
40 to 44 years	110	7.4
45 to 49 years	131	8.8
50 to 54 years	150	10.0
55 to 59 years	131	8.8
60 to 64 years	116	7.8
65 to 69 years	62	4.2
70 to 74 years	45	3.0
75 to 79 years	31	2.1
80 to 84 years	17	1.1
85 years and over	19	1.3
Median age (years)	43.3	(X)
16 years and over	1,215	81.4
18 years and over	1,169	78.3
21 years and over	1,119	74.9
62 years and over	239	16.0
65 years and over	174	11.7
Male population	755	50.6
Under 5 years	31	2.1
5 to 9 years	46	3.1
10 to 14 years	62	4.2
15 to 19 years	55	3.7
20 to 24 years	39	2.6
25 to 29 years	38	2.5
30 to 34 years	46	3.1
35 to 39 years	47	3.1
40 to 44 years	47	3.1
45 to 49 years	56	3.8
50 to 54 years	75	5.0
55 to 59 years	79	5.3
60 to 64 years	57	3.8
65 to 69 years	28	1.9
70 to 74 years	22	1.5
75 to 79 years	14	0.9
80 to 84 years	5	0.3
85 years and over	8	0.5

Subject	Number	Percent
Median age (years)	41.3	(X)
16 years and over	600	40.2
18 years and over	584	39.1
21 years and over	552	37.0
62 years and over	109	7.3
65 years and over	77	5.2
Female population	738	49.4
Under 5 years	37	2.5
5 to 9 years	35	2.3
10 to 14 years	40	2.7
15 to 19 years	53	3.5
20 to 24 years	32	2.1
25 to 29 years	33	2.2
30 to 34 years	42	2.8
35 to 39 years	45	3.0
40 to 44 years	63	4.2
45 to 49 years	75	5.0
50 to 54 years	75	5.0
55 to 59 years	52	3.5
60 to 64 years	59	4.0
65 to 69 years	34	2.3
70 to 74 years	23	1.5
75 to 79 years	17	1.1
80 to 84 years	12	0.8
85 years and over	11	0.7
Median age (years)	44.3	(X)
16 years and over	615	41.2
18 years and over	585	39.2
21 years and over	567	38.0
62 years and over	130	8.7
65 years and over	97	6.5
RACE		
Total population	1,493	100.0
One Race	1,467	98.3
White	1,359	91.0
Black or African American	23	1.5
American Indian and Alaska Native	11	0.7
Asian	8	0.5
Asian Indian	1	0.1
Chinese	0	0.0
Filipino	2	0.1
Japanese	0	0.0
Korean	0	0.0
Vietnamese	4	0.3
Other Asian [1]	1	0.1
Native Hawaiian and Other Pacific Islander	0	0.0
Native Hawaiian	0	0.0
Guamanian or Chamorro	0	0.0
Samoan	0	0.0
Other Pacific Islander [2]	0	0.0
Some Other Race	66	4.4
Two or More Races	26	1.7
White; American Indian and Alaska Native [3]	10	0.7
White; Asian [3]	5	0.3
White; Black or African American [3]	4	0.3
White; Some Other Race [3]	5	0.3
Race alone or in combination with one or more other races: [4]		
White	1,384	92.7
Black or African American	29	1.9
American Indian and Alaska Native	23	1.5

Subject	Number	Percent
Asian	13	0.9
Native Hawaiian and Other Pacific Islander	0	0.0
Some Other Race	71	4.8
HISPANIC OR LATINO		
Total population	1,493	100.0
Hispanic or Latino (of any race)	260	17.4
Mexican	213	14.3
Puerto Rican	6	0.4
Cuban	3	0.2
Other Hispanic or Latino [5]	38	2.5
Not Hispanic or Latino	1,233	82.6
HISPANIC OR LATINO AND RACE		
Total population	1,493	100.0
Hispanic or Latino	260	17.4
White alone	185	12.4
Black or African American alone	1	0.1
American Indian and Alaska Native alone	3	0.2
Asian alone	0	0.0
Native Hawaiian and Other Pacific Islander alone	0	0.0
Some Other Race alone	63	4.2
Two or More Races	8	0.5
Not Hispanic or Latino	1,233	82.6
White alone	1,174	78.6
Black or African American alone	22	1.5
American Indian and Alaska Native alone	8	0.5
Asian alone	8	0.5
Native Hawaiian and Other Pacific Islander alone	0	0.0
Some Other Race alone	3	0.2
Two or More Races	18	1.2
RELATIONSHIP		
Total population	1,493	100.0
In households	1,493	100.0
Householder	559	37.4
Spouse [6]	371	24.8
Child	423	28.3
Own child under 18 years	285	19.1
Other relatives	78	5.2
Under 18 years	32	2.1
65 years and over	13	0.9
Nonrelatives	62	4.2
Under 18 years	6	0.4
65 years and over	4	0.3
Unmarried partner	34	2.3
In group quarters	0	0.0
Institutionalized population	0	0.0
Male	0	0.0
Female	0	0.0
Noninstitutionalized population	0	0.0
Male	0	0.0
Female	0	0.0
HOUSEHOLDS BY TYPE		
Total households	559	100.0
Family households (families) [7]	441	78.9
With own children under 18 years	156	27.9
Husband-wife family	371	66.4
With own children under 18 years	123	22.0
Male householder, no wife present	26	4.7
With own children under 18 years	14	2.5
Female householder, no husband present	44	7.9
With own children under 18 years	19	3.4

Subject	Number	Percent
Nonfamily households [7]	118	21.1
Householder living alone	89	15.9
Male	40	7.2
65 years and over	7	1.3
Female	49	8.8
65 years and over	20	3.6
Households with individuals under 18 years	180	32.2
Households with individuals 65 years and over	123	22.0
Average household size	2.67	(X)
Average family size [7]	2.98	(X)
HOUSING OCCUPANCY		
Total housing units	632	100.0
Occupied housing units	559	88.4
Vacant housing units	73	11.6
For rent	2	0.3
Rented, not occupied	1	0.2
For sale only	14	2.2
Sold, not occupied	0	0.0
For seasonal, recreational, or occasional use	7	1.1
All other vacants	49	7.8
Homeowner vacancy rate (percent) [8]	2.7	(X)
Rental vacancy rate (percent) [9]	3.4	(X)
HOUSING TENURE		
Occupied housing units	559	100.0
Owner-occupied housing units	503	90.0
Population in owner-occupied housing units	1,314	(X)
Average household size of owner-occupied units	2.61	(X)
Renter-occupied housing units	56	10.0
Population in renter-occupied housing units	179	(X)
Average household size of renter-occupied units	3.20	(X)

X Not applicable.

[1] Other Asian alone, or two or more Asian categories.

[2] Other Pacific Islander alone, or two or more Native Hawaiian and Other Pacific Islander categories.

[3] One of the four most commonly reported multiple-race combinations nationwide in Census 2000.

[4] In combination with one or more of the other races listed. The six numbers may add to more than the total population, and the six percentages may add to more than 100 percent because individuals may report more than one race.

[5] This category is composed of people whose origins are from the Dominican Republic, Spain, and Spanish-speaking Central or South American countries. It also includes general origin responses such as "Latino" or "Hispanic."

[6] "Spouse" represents spouse of the householder. It does not reflect all spouses in a household. Responses of "same-sex spouse" were edited during processing to "unmarried partner."

[7] "Family households" consist of a householder and one or more other people related to the householder by birth, marriage, or adoption. They do not include same-sex married couples even if the marriage was performed in a state issuing marriage certificates for same-sex couples. Same-sex couple households are included in the family households category if there is at least one additional person related to the householder by birth or adoption. Same-sex couple households with no relatives of the householder present are tabulated in nonfamily households. "Nonfamily households" consist of people living alone and households which do not have any members related to the householder.

[8] The homeowner vacancy rate is the proportion of the homeowner inventory that is vacant "for sale." It is computed by dividing the total number of vacant units "for sale only" by the sum of owner-occupied units, vacant units that are "for sale only," and vacant units that have been sold but not yet occupied; and then multiplying by 100.

[9] The rental vacancy rate is the proportion of the rental inventory that is vacant "for rent." It is computed by dividing the total number of vacant units "for rent" by the sum of the renter-occupied units, vacant units that are "for rent," and vacant units that have been rented but not yet occupied; and then multiplying by 100.

Source: U.S. Census Bureau, 2010 Census.



ESRI

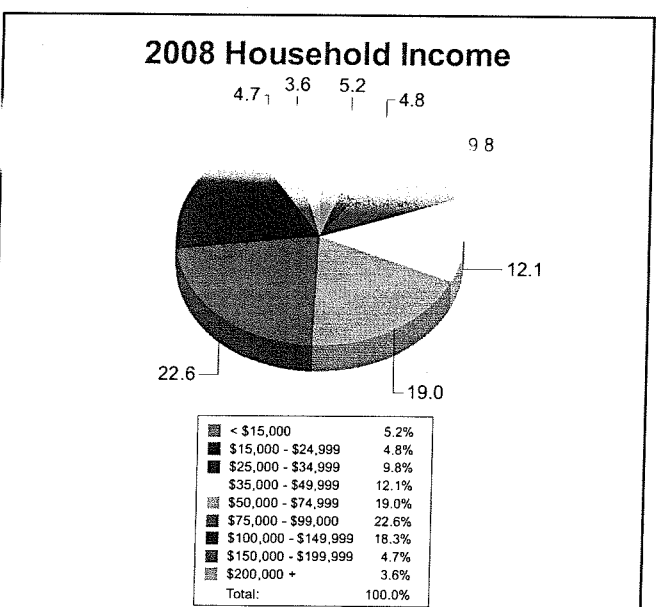
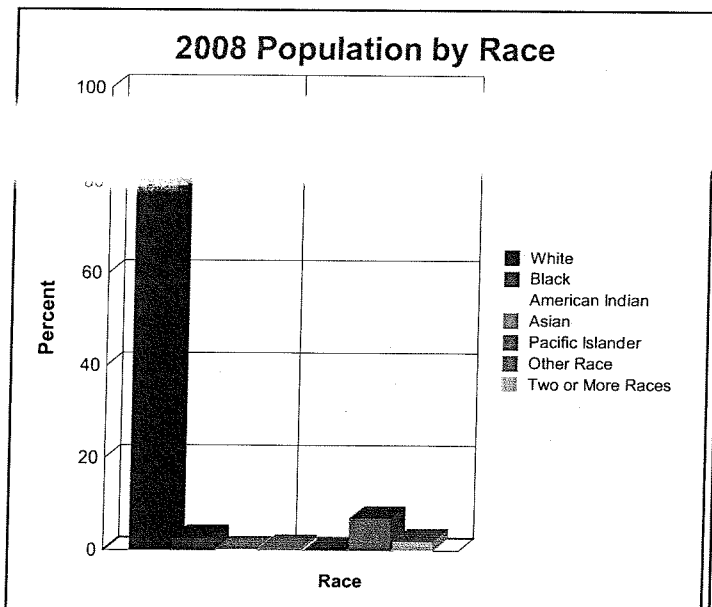
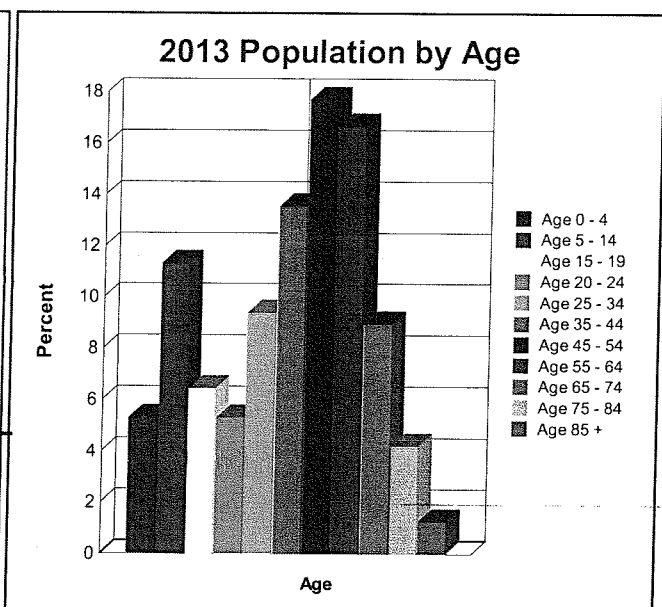
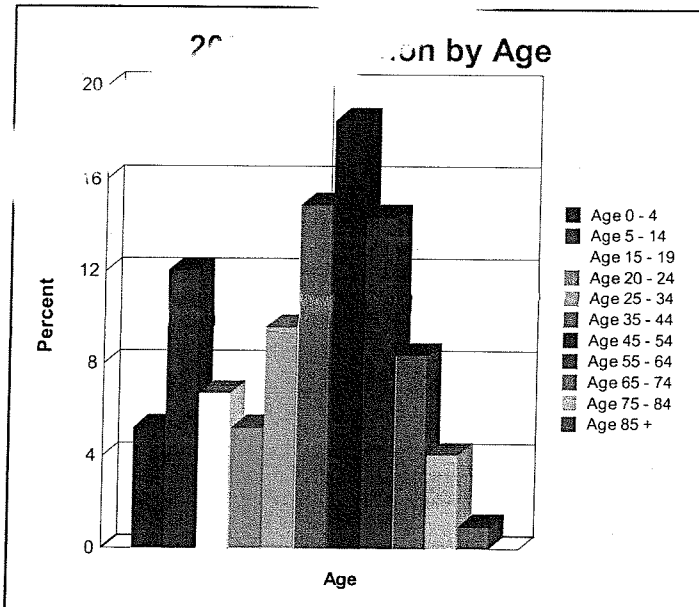
Demographic and Income Profile

Shoreacres, Texas

Area ID: Shoreacres

Name:

Description: Shoreacres, Texas



Source: ESRI, 2008 Estimates and Projections

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Phone: 888-377-4575 - www.esri.com

10/23/2008

Page 2 of 2



Demographic and Income Profile

Shoreacres, Texas

Area ID: Shoreacres

Name: Shoreacres

Description: Shoreacres, Texas

Summary	2000	2008	2013	Annual Rate
Population	1,478	1,552	1,661	1.37%
Households	555	579	618	1.31%
Families	425	434	456	0.99%
Average Household Size	2.66	2.68	2.69	
Owner-occupied HUs	460	485	507	
Renter-occupied HUs	95	94	111	
Median Age	39.9	42.7	44.2	

Households by Income	2000		2008		2013	
	Number	Percent	Number	Percent	Number	Percent
<\$15,000	28	5.0%	28	4.8%	29	4.7%
\$15,000 - \$24,999	52	9.7%	57	9.8%	34	5.5%
\$25,000 - \$34,999	82	15.3%	70	12.1%	78	12.6%
\$35,000 - \$49,999	118	22.0%	110	19.0%	133	21.5%
\$50,000 - \$74,999	85	15.9%	131	22.6%	100	16.2%
\$75,000 - \$99,999	84	15.7%	106	18.3%	156	25.2%
\$100,000 - \$149,999	16	3.0%	27	4.7%	32	5.2%
\$150,000 - \$199,999	13	2.4%	21	3.6%	28	4.5%
\$200,000+						
Median Household Income	\$61,060		\$73,341		\$76,281	
Average Household Income	\$72,155		\$85,356		\$93,499	
Per Capita Income	\$28,090		\$32,854		\$35,919	

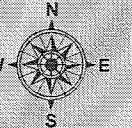
Population by Age	2000		2008		2013	
	Number	Percent	Number	Percent	Number	Percent
0 - 4	84	5.7%	81	5.2%	88	5.3%
5 - 14	213	14.4%	187	12.0%	188	11.3%
15 - 19	99	6.7%	104	6.7%	107	6.4%
20 - 24	69	4.7%	81	5.2%	88	5.3%
25 - 34	162	11.0%	149	9.6%	156	9.4%
35 - 44	262	17.7%	231	14.9%	225	13.5%
45 - 54	265	17.9%	288	18.6%	294	17.7%
55 - 64	165	11.2%	223	14.4%	277	16.7%
65 - 74	108	7.3%	130	8.4%	149	9.0%
75 - 84	40	2.7%	63	4.1%	70	4.2%
85+		0.7%	15	1.0%	21	1.3%

Race and Ethnicity	2008		2013	
	Number	Percent	Number	Percent
White Alone	1,351	91.5%	1,395	84.0%
Black Alone	31	2.1%	51	3.1%
American Indian Alone	5	0.3%	7	0.4%
Asian Alone	7	0.5%	14	0.8%
Pacific Islander Alone	1	0.1%	3	0.2%
Some Other Race Alone	60	4.1%	149	9.0%
Two or More Races	22	1.5%	42	2.5%
Hispanic Origin (Any Race)	144	9.8%	348	21.0%



City of Shoreacres

Street & Drainage Improvements



1 INCH = 300 FEET

City of La Porte

City of Shoreacres

Galveston Bay

Taylor Bayou

Bayport Channel

City of Pasadena

Legend

Project Type

- Police Station
- Sanitary Utility
- Water Utility
- Storm Utility
- Street Repavement

Administrative Boundaries

- Shoreacres City Limits
- Harris County Parcels

CobbFendley

MAP PROJECTS INDEX

Street Repavement

- Bayou Dr. from Forest Ave. to Shore Acres Blvd.
- East Country Club Dr. from Shore Acres Blvd. to Bayou Dr.
- Bayou Dr. from Shore Acres Blvd. to East Country Club Dr.
- Bayou Dr. from Shore Acres Blvd. to South Country Club Dr.
- Centre Dr. from Forest Ave. to Shore Acres Blvd.
- Centre Dr. from North Country Club Dr. to Forest Ave.
- North Country Club Dr. from Forest Ave. to Centre Ave.
- North Country Club Dr. from Centre Ave. to Forest Ave.
- West Country Club Dr. from Forest Ave. to Shore Acres Blvd.
- East Country Club Dr. from Forest Ave. to Shore Acres Blvd.
- Oakdale Ave. from Park Circle to Byway Dr.
- Oakdale Ave. from Westview Dr. to Park Ln.

Storm Utility

- Shoreacres Drainage Ditch

Water Utility

- Water Plant #1
- Water Plant #2

Sanitary Utility

- Lift Station #1
- Lift Station #2
- Lift Station #3

Public Safety

- Police Station

Appendix B

- City of Shoreacres: Resolution 2011-68

**RESOLUTION No. 2011-68
CITY OF SHOREACRES**

A RESOLUTION ESTABLISHING POLICIES AFFECTING INFRASTRUCTURE PROJECTS, COMPLAINT PROCEDURES, RECORD KEEPING, TRAINING, AND PUBLIC INFORMATION TO AFFIRMATIVELY FURTHER FAIR HOUSING; MAKING VARIOUS FINDINGS AND PROVISIONS RELATING TO THE SUBJECT; FINDING COMPLIANCE WITH THE OPEN MEETINGS LAW; AND PROVIDING AN EFFECTIVE DATE HEREOF.

* * * *

WHEREAS, where people live affects almost every aspect of their lives and determines access to jobs, quality schools, medical care, stores, services, and other opportunities; and,

WHEREAS, the City of Shoreacres recognizes the importance of fair housing laws designed to eliminate discrimination and promote integration in housing and eliminate practices that disproportionately harm minorities and protected classes; and,

WHEREAS, the Fair Housing Act prohibits discrimination in a broad range of housing activities, with an emphasis on fighting discrimination in public housing, discriminatory exclusionary zoning practices and discriminatory mortgage lending practices; and,

WHEREAS, the Fair Housing Act includes a provision requiring affirmative steps to overcome discrimination, and more specifically to promote residential integration; and,

WHEREAS, the receipt of funding from federal housing programs such as the Community Development Block Grant (CDBG) program is expressly conditioned on a jurisdiction's certification that it will affirmatively further fair housing; and,

WHEREAS, the City of Shoreacres desires to promote non-discrimination, and fair and equal housing opportunities for all;

NOW THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SHOREACRES:

THAT, the City Council hereby adopts these policies which shall be effective in concert with existing and future policies until such time as they may be otherwise expressly modified.

Infrastructure Projects

Publicly accessible infrastructure projects undertaken and/or approved by the City are required to be compliant with the Americans with Disabilities Act (ADA) and address other discrimination issues such as accessibility. Compliance is required for all projects including those using CDBG, disaster recovery funds, as well as non-federal funding sources.

Infrastructure projects such as wastewater pumping stations; solid waste handling or collection points; or other improvements that tend to adversely impact housing shall not be geographically concentrated in a manner that disproportionately impacts protected classes.

Fair Housing Complaints

With guidance provided by TDHCA the City will develop a process and clear procedures for handling fair housing complaints.

Fair Housing Records

The City will keep permanent logs and records of all fair housing inquiries, allegations, complaints and referrals.

Fair Housing Training

The City Administrator is required to obtain Fair Housing training within the first 12 months on the job and to obtain updated training no less than once every five years thereafter. Building Department staff shall be provided with Fair Housing training within the first 12 months on the job and updated training no less than once every two years thereafter. Training is to be provided and/or approved by the U.S. Department of Housing and Urban Development (HUD) or the Texas Department of Housing and Community Affairs (TDHCA). City staff will be trained to take fair housing questions and complaints and direct them to the City Administrator who is designated to investigate or refer fair housing complaints.

Fair Housing Contact Information

The City will provide on its website contact information for reporting a Fair Housing complaint, at the local, state, and federal levels if citizens believe they were victims of housing discrimination. Documents concerning housing and community development programs that are provided to the public will list fair housing contacts and procedures consistent with that suggested by TDHCA.

Fair Housing Statement

The City will publish a fair housing policy statement consistent with that suggested by TDHCA.



The City Council officially finds, determines, recites, and declares that a sufficient written notice of the date, hour, place and subject of this meeting of the City Council was posted at a place convenient to the public at the City Hall of the City for the time required by law preceding this meeting, as required by the Open Meetings Law, Chapter 551, Texas Government Code; and that this meeting has been open to the public as required by law at all times during which this resolution and the subject matter thereof has been discussed, considered and formally acted upon. The City Council further ratifies, approves and confirms such written notice and the contents and posting thereof.

This Resolution shall take effect immediately upon passage.

PASSED AND APPROVED, this 22nd day of August, 2011.



ATTEST:

David K. Stall, City Secretary

CITY OF SHOREACRES

By:

Dolly Arons, Mayor

Appendix C

- City of Shoreacres: Ordinance 2008-22 – DECLARING AN EMERGENCY; PROVIDING FOR TEMPORARY HOUSING ON RESIDENTIAL LOTS; AND, SUSPENDING RULES, REGULATIONS, AND ORDINANCES IN CONFLICT HERewith
- City of Shoreacres: Ordinance 2008-27 – DECLARING AN EMERGENCY; PROVIDING FOR TEMPORARY FEMA HOUSING ON RESIDENTIAL LOTS; AND, SUSPENDING RULES, REGULATIONS, AND ORDINANCES IN CONFLICT HERewith
- City of shoreacres: Ordinance 2009-41 – DECLARING AN EMERGENCY; PROVIDING FOR THE CONTINUATION OF TEMPORARY HOUSING ON RESIDENTIAL LOTS; AND, SUSPENDING RULES, REGULATIONS, AND ORDINANCES IN CONFLICT HERewith

ORDINANCE NUMBER 2008-22
DECLARING AN EMERGENCY; PROVIDING FOR TEMPORARY HOUSING ON
RESIDENTIAL LOTS; AND, SUSPENDING RULES, REGULATIONS, AND
ORDINANCES IN CONFLICT HEREWITH

AN ORDINANCE DECLARING AN EMERGENCY; PROVIDING FOR TEMPORARY HOUSING ON RESIDENTIAL LOTS; AND, SUSPENDING RULES, REGULATIONS, AND ORDINANCES IN CONFLICT HEREWITH.

BE IT ORDAINED BY THE COUNCIL OF THE CITY OF SHOREACRES, STATE OF TEXAS:

SECTION 1. The City Council officially finds, determines, and declares that a public emergency exists as the result of catastrophic damage inflicted widely upon the city by Hurricane Ike.

SECTION 2. The owner of a dwelling that was rendered uninhabitable as the result of damage caused by hurricane Ike on or about September 13, 2008, may place one (1) motor home or one (1) travel trailer on the same residential lot for the purpose of temporary housing during construction, reconstruction, or repair of the damaged habitation. All connections to utilities shall be in compliance with applicable codes and are further subject to approval by, or additional requirements of, the Building Official. Such temporary housing must be located no closer than five (5) feet from side or back property lines and may be placed in part or whole in front of the front building set back line up to the front property line. The temporary housing may not however extend beyond the property line into the public right of way. No internal combustion engine powered generator shall be used to provide electrical service to the temporary housing when commercial electrical service is available. Each trailer or motor home used as temporary housing must be equipped with a minimum of one (1) readily accessible 5# ABC fire extinguisher and a battery operated smoke detector in working condition mounted in compliance with the manufacturer's instructions.

SECTION 3. The City Council officially finds, determines, recites, and declares that a sufficient written notice of the date, hour, place and subject of this meeting of the City Council was posted at a place convenient to the public at the City Hall of the City for the time required by law preceding this meeting, as required by the Open Meetings Law, Chapter 551, Texas Government Code; and that this meeting has been open to the public as required by law at all times during which this ordinance and the subject matter thereof has been discussed, considered and formally acted upon. The City Council further ratifies, approves and confirms such written notice and the contents and posting thereof.

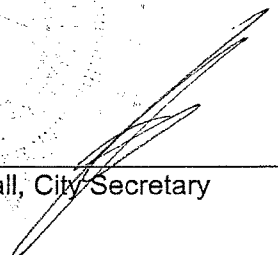
SECTION 4. After passage and approval this Ordinance shall expire and be repealed on March 31, 2009.

SECTION 5. This Ordinance shall be effective from and after its passage and approval, and it is so ordered.

PASSED AND APPROVED ON THE 22ND DAY OF SEPTEMBER 2008.


Jayo Washington, Mayor

ATTEST:



David Stall, City Secretary

ORDINANCE NUMBER 2008-27
DECLARING AN EMERGENCY; PROVIDING FOR TEMPORARY FEMA HOUSING
ON RESIDENTIAL LOTS; AND, SUSPENDING RULES, REGULATIONS, AND
ORDINANCES IN CONFLICT HERewith

AN ORDINANCE DECLARING AN EMERGENCY; PROVIDING FOR TEMPORARY FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) HOUSING ON RESIDENTIAL LOTS; TEMPORARY FEMA HOUSING ON STATE LAND; AND, SUSPENDING RULES, REGULATIONS, AND ORDINANCES IN CONFLICT HERewith.

BE IT ORDAINED BY THE COUNCIL OF THE CITY OF SHOREACRES, STATE OF TEXAS:

SECTION 1. The City Council officially finds, determines, and declares that a public emergency exists as the result of catastrophic damage inflicted widely upon the city by Hurricane Ike.

SECTION 2. The owner of a dwelling that was rendered uninhabitable as the result of damage caused by Hurricane Ike on or about September 13, 2008, may allow the placement of one (1) temporary housing unit provided by the Federal Emergency Management Agency (FEMA) on the same residential lot or contiguous residential lot(s) under the same ownership for the purpose of temporary housing during construction, reconstruction, relocation or repair of the damaged habitation. All utility connections shall be made in compliance with applicable codes and are subject to approval by the Building Official. Such temporary FEMA housing shall not be located closer than five (5) feet from side or back property lines and may be placed in part or whole in front of the front building set back line up to the front property line. The temporary FEMA housing may not however extend beyond the property line into the public right of way without written authorization of the City Administrator. Each temporary housing unit must be equipped with a minimum of one (1) readily accessible 5# ABC fire extinguisher and properly functioning smoke detector(s) mounted and maintained in compliance with the manufacturer's instructions.

SECTION 3. FEMA may place temporary housing units on State owned non-residential land for the purpose of housing the owners of dwellings that were rendered uninhabitable as the result of damage caused by Hurricane Ike on or about September 13, 2008, during the construction, reconstruction, relocation or repair of their damaged habitation. All utility connections shall be made in compliance with applicable codes and are subject to approval by the Building Official. Such temporary FEMA housing shall not be located closer than five (5) feet from any adjoining private property line. Each temporary housing unit must be equipped with a minimum of one (1) readily accessible 5# ABC fire extinguisher and properly functioning smoke detector(s) mounted and maintained in compliance with the manufacturer's instructions.

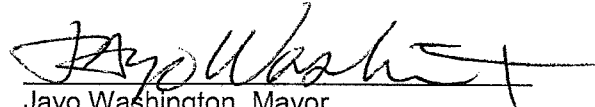
SECTION 4. The City Council officially finds, determines, recites, and declares that a sufficient written notice of the date, hour, place and subject of this meeting of the City Council was posted at a place convenient to the public at the City Hall of the City for the time required by law preceding this meeting, as required by the Open Meetings Law,

Chapter 551, Texas Government Code; and that this meeting has been open to the public as required by law at all times during which this ordinance and the subject matter thereof has been discussed, considered and formally acted upon. The City Council further ratifies, approves and confirms such written notice and the contents and posting thereof.

SECTION 5. After passage and approval this Ordinance shall expire and be repealed on March 15, 2010.

SECTION 6. This Ordinance shall be effective from and after its passage and approval, and it is so ordered.

PASSED AND APPROVED ON THE 14TH DAY OF NOVEMBER 2008.


Jayo Washington, Mayor

ATTEST:



David Stall, City Secretary

**ORDINANCE NUMBER 2009-41
DECLARING AN EMERGENCY; PROVIDING FOR THE CONTINUATION OF
TEMPORARY HOUSING ON RESIDENTIAL LOTS; AND, SUSPENDING RULES,
REGULATIONS, AND ORDINANCES IN CONFLICT HEREWITH**

AN ORDINANCE DECLARING AN EMERGENCY; PROVIDING FOR THE CONTINUATION OF TEMPORARY HOUSING ON RESIDENTIAL LOTS; AND, SUSPENDING RULES, REGULATIONS, AND ORDINANCES IN CONFLICT HEREWITH.

BE IT ORDAINED BY THE COUNCIL OF THE CITY OF SHOREACRES, STATE OF TEXAS:

SECTION 1. The City Council officially finds, determines, and declares that a public emergency exists as the result of catastrophic damage inflicted widely upon the city by Hurricane Ike.

SECTION 2. The owner of a dwelling that was rendered uninhabitable as the result of damage caused by hurricane Ike on or about September 13, 2008, may place one (1) motor home or one (1) travel trailer on the same residential lot for the purpose of temporary housing during construction, reconstruction, or repair of the damaged habitation. All connections to utilities shall be in compliance with applicable codes and are further subject to approval by, or additional requirements of, the Building Official. Such temporary housing must be located no closer than five (5) feet from side or back property lines and may be placed in part or whole in front of the front building set back line up to the front property line. The temporary housing may not however extend beyond the property line into the public right of way. No internal combustion engine powered generator shall be used to provide electrical service to the temporary housing when commercial electrical service is available. Each trailer or motor home used as temporary housing must be equipped with a minimum of one (1) readily accessible 5# ABC fire extinguisher and a battery operated smoke detector in working condition mounted in compliance with the manufacturer's instructions.

SECTION 3. The City Council officially finds, determines, recites, and declares that a sufficient written notice of the date, hour, place and subject of this meeting of the City Council was posted at a place convenient to the public at the City Hall of the City for the time required by law preceding this meeting, as required by the Open Meetings Law, Chapter 551, Texas Government Code; and that this meeting has been open to the public as required by law at all times during which this ordinance and the subject matter thereof has been discussed, considered and formally acted upon. The City Council further ratifies, approves and confirms such written notice and the contents and posting thereof.

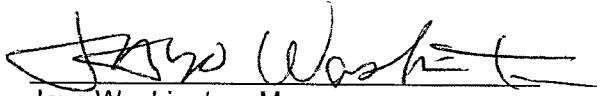
SECTION 4. After passage and approval this Ordinance shall expire and be repealed on March 31, 2010.

SECTION 5. This Ordinance shall be effective from and after its passage and approval, and it is so ordered.

PASSED AND APPROVED ON THE 11TH DAY OF MAY 2009.

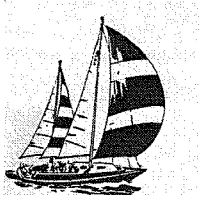
ATTEST:

David Stall, City Secretary


Jayo Washington, Mayor

Appendix D

- City of Shoreacres: City Administrator Letter of Review



City of Shoreacres

601 Shore Acres Boulevard, Shoreacres, Texas 77571-7262
281.471.2244 • Fax 281.471.8955 • www.CityofShoreacres.us

Dolly Arons
Mayor

David K. Stall, CFM
Administrator

August 15, 2011

Mr. Steve Jones, Chairman
Shoreacres FFAST Working Group

Mr. Jones:

I have reviewed the City of Shoreacres City Code (ordinances) to identify any potential impediments relating to special needs persons.

At the direction of the Shoreacres FFAST Working Group I have conducted a review of city codes, ordinances, rules, regulations and policies to determine direct or indirect limitations that would prevent facilities or personal residences from providing assistance or communities of choice including:

- (1) Rules that might prevent facilities or personal residences from providing assistance or communities of choice or service-enriched environments that directly impact special needs person; and,
- (2) Rules that might unfairly increase the costs to special needs persons.

No direct or indirect limitations were found that would tend to prevent facilities or personal residences from providing assistance or communities of choice; or, that create a potential impediment relating to special needs persons.

I look forward to continue work with your group to review other fair housing aspects of the city's code, rules and regulations in the future.

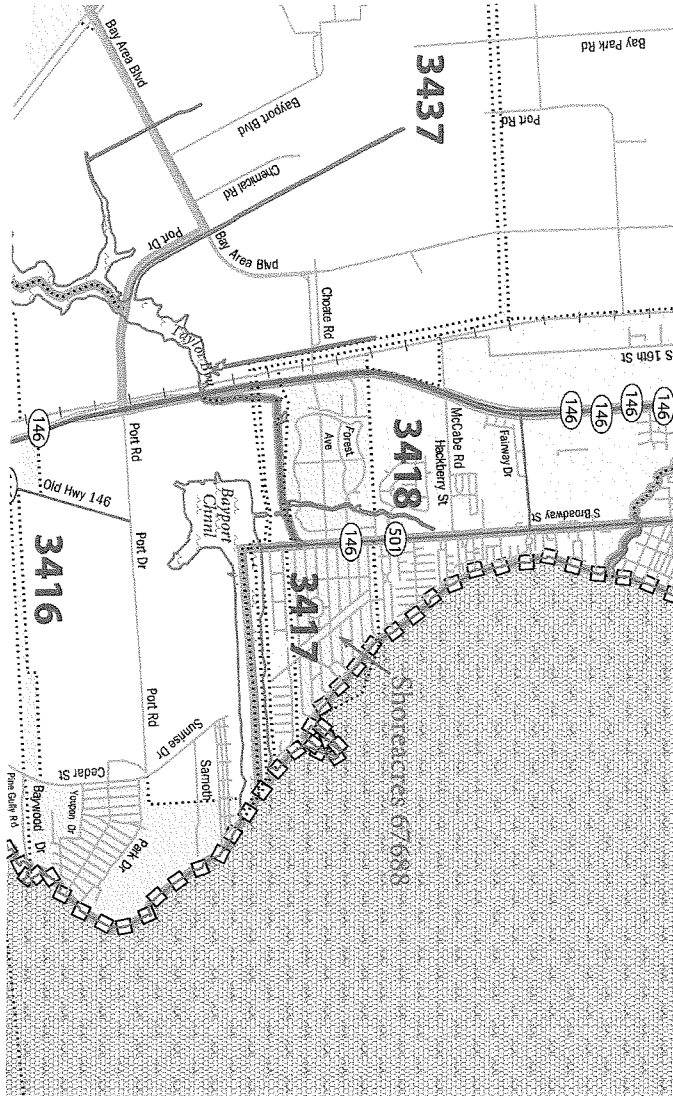
Sincerely,



David K. Stall, CFM
City Administrator

Appendix E

- GIS Mapping
- Census Tract
- Harris County: Damage Assessment Report



[illegible]

[illegible]

[illegible]

Shoreacres Individual City Assessment

The city of Shoreacres, a Bay Area city, has approximately 1,552 people and lies on Galveston Bay, south of La Porte. On the Bay, the community lies directly in the path of inland bound Gulf Coast storms, including hurricanes, as was the case with Hurricane Ike, which struck the Texas Coast on September 13, 2008.

Like all other cities in Harris County, Shoreacres was impacted by Hurricane Ike. This Shoreacres individual city assessment provides important and helpful information regarding the damage and effect on residential housing units, as well as, the current housing need for the Shoreacres community, post-Hurricane Ike.

Of Shoreacres 677 single family residential units, four suffered Level 4 damage and were destroyed, along with 393 units with Level 3, major damage, rendering them uninhabitable. Another 87 units suffered Level 2, minor damage, which may include missing shingles, broken windows and doors and 6 inches to 2 feet of water inside the home. Level 1, affected damage, impacted 90 housing units, which may include a few missing shingles, broken windows and less than 6 inches of water inside the home. A projected 397 households were displaced from uninhabitable units. On a positive note, 103 Shoreacres housing units experienced no damage from the storm.

Shoreacres Community – Post-Ike Comments 90 Days after the Storm

In the Shoreacres community, the majority of homes suffered damage, ranging from slight to major. Despite this hard fact, the residents have worked diligently to recover from the impact of the storm. The process is arduous and at times, overwhelming, but that does not deter the residents from working forward to reclaim their community. As the clean-up and recovery process continues, progress is being made, which encourages everyone. Though it seems far away, eventually everyone will return to that special place called "normal." When that time comes, each person will have their own memories of the impact and challenges Hurricane Ike brought to their lives, individually and as a community.

SHOREACRES KEY DAMAGE PROJECTIONS:

Total Housing Units 677

Total Projected
Residential
Housing Damage \$33 million

Projected Single Family
Units Uninhabitable
(Major Damage or
Destroyed) 397

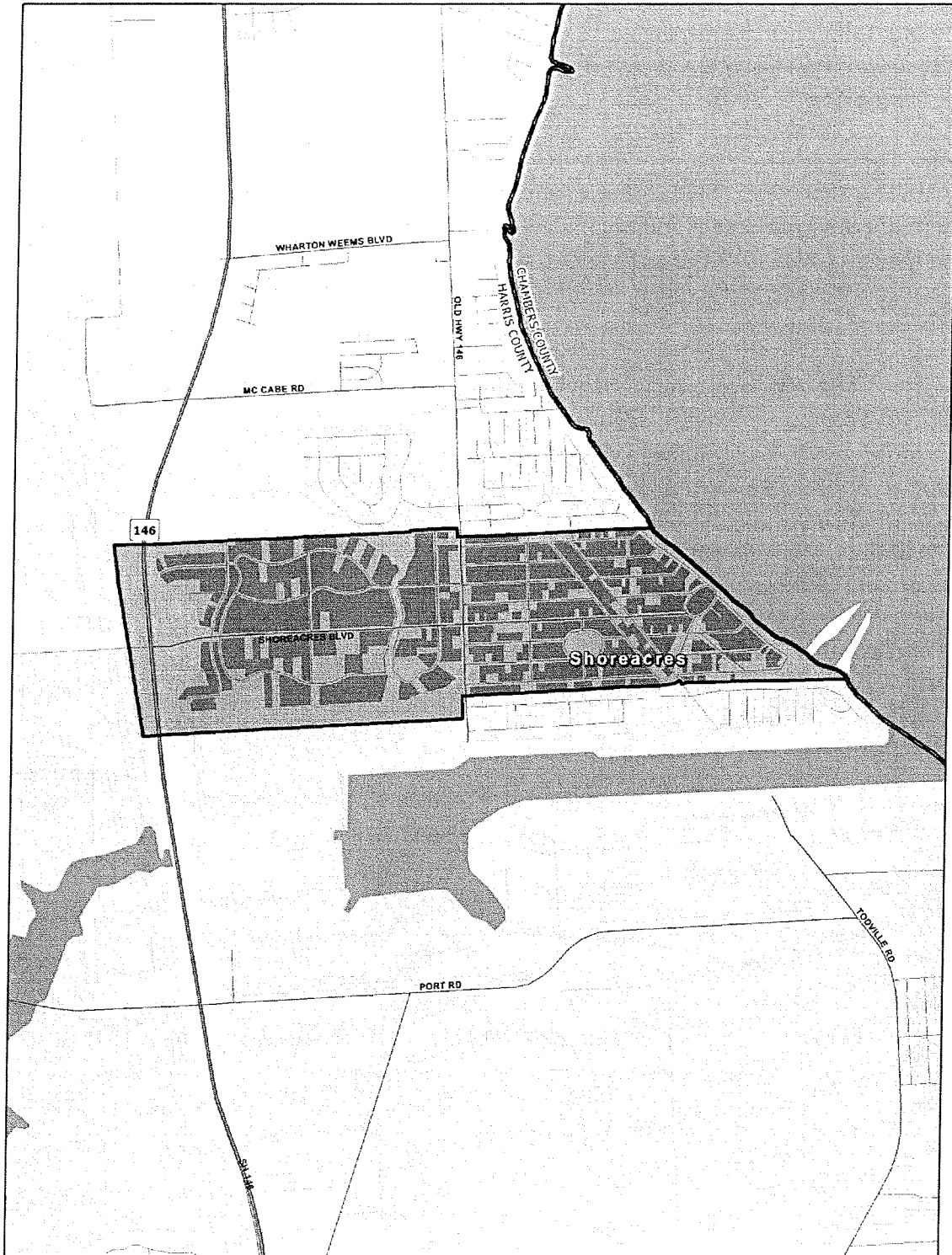
Projected Single
Family Units (Affected
or Minor Damage) 177

Projected Multi-Family
Units (Affected or
Minor Damage) None

Projected Displaced
Households 397

Exhibit 1.0 displays a map of Shoreacres.

Exhibit 1.0
Map of Shoreacres



Source: Harris County Public Infrastructure Department (HCPID)

Damage Assessment Methodology

Inspection teams conducted property damage assessments on single family, multi-family and mobile home housing units. These assessments were conducted in 34 cities in incorporated and unincorporated residential areas within 1,700 square miles of Harris County.

The Office of Emergency Management (OEM) "Annex J" standard was applied to the categorizing of damage levels. Annex J damage categories range from Level 0 to Level 4. Exhibit 2.0 below describes visual damage levels.

Exhibit 2.0 Visual Damage Levels

Level 1 – AFFECTED

Level 1 damage indicates property that has been "affected." The structure is habitable, but may include any of the following: a few missing shingles, broken windows, damage to automobiles, damaged air conditioner compressor and less than 6 inches of water.

Level 2 – MINOR

Level 2 indicates property that has "minor" damage. The structure is habitable with minor repairs, and may include any of the following: a few missing shingles, broken windows and doors, loose, missing and/or damaged siding, minor shifting or settling of foundation, damaged septic systems (flood), and 6 inches to 2 feet of water, but less than 6 inches of water in mobile homes.

Level 3 – MAJOR

Level 3 indicates property that has "major" damage. The structure is currently uninhabitable and requires extensive repairs and/or replacement, including: portions of the roof, decking, twisted, bowed, or cracked walls, penetration of structure by trees, cars, etc., and 2 to 4 feet of water, 6 to 12 inches in mobile homes.

Level 4 – DESTROYED

Level 4 indicates property that has been "destroyed." The structure is permanently uninhabitable and cannot be repaired. This level of destruction is characterized by a missing structure, where only the foundation remains; major sections of walls are missing or have collapsed; the entire roof of a structure is gone with noticeable wall distortions; the structure has shifted off of its foundation; and a dwelling that has taken on more than 4 feet of water, or over 12 inches for mobile homes.

The Overall Damage Levels presented in **Exhibit 3.0** are based on the residential damage assessment and provide a snapshot of Hurricane Ike's impact on the city of Shoreacres. This information can be used to determine the resulting housing needs and aid in the community's recovery and redevelopment.

Exhibit 3.0
Overall Damage Levels

	Total Improved Value	Total Housing Units	Level 0	Level 1	Level 2	Level 3	Level 4	Total Damage Value
Single Family	\$87,998,322	677	103	90	87	393	4	\$33,243,508
Multi-Family	\$0	0	0	0	0	0	0	\$0
Mobile Homes	\$0	0	0	0	0	0	0	\$0
City Total	\$87,998,322	677	103	90	87	393	4	\$33,243,508

Source: Calculations by Harris County Public Infrastructure Department (HCPID) based on Harris County Appraisal District (HCAD) data

Demographic characteristics for the city of Shoreacres, as shown in **Exhibit 4.0**, include Household Incomes (Median and Average), Per Capita Income, Average Property Values, Household Sizes and Median Age. These characteristics help recreate a pre-Hurricane Ike picture, while establishing parameters for damage assessment.

Exhibit 4.0
2008 Demographic Characteristics

Household Income		Average Property Values (excluding land)		Household Sizes	
Median Household	\$73,341	Single Family	\$129,983	Average Household	2.68
Average Household	\$85,356	Multi-Family	N/A	Owner-occupied HUs	485
Per Capita	\$32,854	Mobile Homes	N/A	Renter-occupied HUs	94
				Median Age	42.7

Source: Calculations by Harris County Public Infrastructure Department (HCPID) based on Harris County Appraisal District (HCAD) and ESRI, 2008 Census Data

Summary

Of Shoreacres recorded 677 single family housing units, 397 units were damaged enough to be categorized as Level 4 and 3, uninhabitable. The projected, total residential damage amount for the city of Shoreacres stands at \$33,243,508. In addition, data from the damage assessment projects the temporary housing need for the city of Seabrook at 397 households.

The following pages illustrate the range of damage for residential units within the city of Shoreacres:

TEXAS



GENERAL LAND OFFICE

JERRY PATTERSON, COMMISSIONER

FHAST FORM APPROVAL LETTER

November 30, 2011

The Honorable Dolly Arons
Mayor of the City of Shoreacres
601 Shoreacres Blvd.
Shoreacres, Tx 77571

RE: FHAST Form Submission for the City of Shoreacres

Dear Mayor Arons:

Thank you for your cooperation in submitting a FHAST form for the disaster recovery program. We understand this was additional time on your staff, and we appreciate your commitment to help your communities. Based upon the review process, your FHAST Form has been approved and your jurisdiction has completed the required FHAST Form process for Round 2.2 funding. The FHAST Form is for Round 2.2 funding, and we encourage you to reference this document as you apply for projects. We appreciate the effort and focus your Working Group made in promoting fair housing in your community. While this form was designed for the disaster recovery funding, any action items can be applied to future funding and other community activities.

A final copy of your approved FHAST Form is attached as part of this notification. We respectfully request that you, if applicable, acknowledge receipt of this notification via email confirmation at txdrfhast@HNTB.com.

Sincerely,

Jorge Ramirez
Director, Disaster Recovery Program

CC: Mr. Gary Hagood, GLO Deputy Commissioner, Financial Management
Phillip Hampsten, GLO Disaster Recovery

Stephen F. Austin Building • 1700 North Congress Avenue • Austin, Texas 78701-1495

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