

### 3.0 Impediments and Strategies Matrix

This section includes recommendations for strategies to address impediments identified in Section 2 to affirmatively further fair housing in Harris County. Drawing from information provided in the preceding analysis, the following matrix identifies six impediments to housing choice in Harris County. These impediments are:

1. **Need to combat overt discrimination and lack of fair housing knowledge** – Overt discrimination against protected classes, such as racial and ethnic minorities, persons with disabilities, families with children, persons with limited English proficiency, and the LGBT community inhibits housing choice and is associated with limited fair housing knowledge of residents, housing providers, financial and insurance providers, and local government entities.
2. **Lack of quality affordable housing** – Harris County has insufficient quality, affordable housing that meet the diverse needs of low- to moderate-income individuals, especially persons with disabilities and families with children.
3. **Need to reduce areas of segregation and concentration** – Limited housing choice has led to the segregation and concentration of poverty and minority populations.
4. **Need to improve lack of quality community amenities** – Limited access to transportation services, infrastructure, and public facilities limits housing choice and prevents communities from improving the overall quality of life and opportunity for residents.
5. **Presence of governmental and community opposition towards affordable housing** – Governmental and community opposition to affordable housing is often based on lack of information, misinformation, and unfounded suspicions that lead to highly desirable areas being completely shut off from affordable housing options thus limiting housing choice.
6. **Barriers created by credit and financial institutions** – Predatory lending, concentrated foreclosures, and overt discrimination in credit and financial practices severely limits housing choice, especially for minority populations.

In the following matrix, each impediment is subdivided into specific goals that address certain components of the impediment and form the strategies that were created to address fair housing barriers. Many of the impediments are interrelated and examined in more than one section of the matrix and their causes and impacts frequently overlap.

While the impact of each barrier is felt by individuals, the construction of barriers was developed over time as a result of social and economic policies that led to the concentration of classes of people and poverty. The strategies recommended are geared toward directly helping individuals overcome housing choice barriers and to supporting the area's fair housing infrastructure in coordinating efforts and increased outreach. Due to the interrelated and comprehensive nature of fair housing impediments, many of the strategies are related to more than one impediment and should be considered holistically.

Many of the strategies provided are integrated with the Harris County Consolidated Plan and address broader community needs. The limited power afforded to counties by the State of Texas, creates major obstacles in attempting to address fair housing deficits through county-wide land use policies or ordinances. Many of the strategies focus on education and training efforts that require coordination and collaboration efforts among local government agencies and community organizations. These partnerships will help solidify a much needed fair housing network that synthesizes data collection and organization, promotes regional communication, and thoughtfully informs policy decisions.

**Impediments and Goals****Strategies****Impediment 1 – Need to combat overt discrimination and lack of fair housing knowledge**

A. Provide fair housing outreach and marketing information	<p>Harris County will conduct fair housing activities at various times of the year and will continue to support or collaborate with public and private agencies, organizations and groups to plan and conduct fair housing activities, outreach, and education initiatives. CSD will address this goal in the following ways:</p> <ul style="list-style-type: none"><li>• Continue to mandate that housing subrecipients develop a fair housing marketing plan;</li><li>• Promote and conduct events to celebrate April as Fair Housing Month, and encourage subrecipients to do the same;</li><li>• Provide education on fair housing and general housing issues to 80 lending institutions, housing professionals, non-profits (including CHDOs and CBDOs) and recipients of CSD programs annually;</li><li>• Provide 100 landlords with fair housing information as a condition of registering with the Harris County Housing Resource Center (HRC);</li><li>• Distribute fair housing fliers at 10 community events and public meetings annually;</li><li>• Post fair housing posters in public buildings and community centers, as well as send posters to local community groups;</li><li>• Support the HRC in providing an online and phone-based housing search tool for homebuyers and renters; and</li><li>• Partner with local fair housing organizations to support training and outreach initiatives.</li></ul>
B. Provide fair housing information and policies in additional languages	<p>CSD will, at a minimum, translate public notices and program brochures into Spanish and Vietnamese. The public notices will be posted on the CSD website, major regional newspaper, and local language-specific newspapers. Brochures will be published to the CSD website and in hardcopy.</p>
C. Provide training and education to providers and staff	<p>Through many of its programs, CSD educates lenders, real estate agents, housing developers, service providers, and the general public on general housing and fair housing issues. The county seeks to protect homebuyers from predatory lending practices and overt discrimination, and educate homebuyers and renters of their rights under the law. CSD will continue to address training barriers in the following ways:</p> <ul style="list-style-type: none"><li>• Conduct an annual fair housing training for CSD staff;</li><li>• Coordinate with local fair housing organizations to provide fair housing training to subrecipients and cooperative cities; and</li><li>• Provide a fair housing training session during the annual RFP workshop.</li></ul>

<p>D. Coordinate fair housing activities within Harris County and the region</p>	<p>In order to better support fair housing related outreach and implementation, CSD will communicate with federal, state, and local governments, as well as community organizations, to coordinate fair housing activities. CSD will address this goal in the following ways:</p> <ul style="list-style-type: none"> <li>• Participate in 2 regional fair housing or housing issues workgroups or meetings per year;</li> <li>• Create and maintain an interested parties mailing list for fair housing and housing issues communications; and</li> <li>• Review impediments and strategies to overcome impediments and other housing policies annually for reporting in each year's CAPER.</li> </ul>
<p>E. Encourage expanded testing and data collection</p>	<p>In order to increase quality data collection and better inform fair housing policy, CSD will encourage local fair housing organizations to expand testing and data collection activities in the following ways:</p> <ul style="list-style-type: none"> <li>• Maintain fair housing complaint data as obtained from the HRC and outside agencies;</li> <li>• Provide spatial mapping and data analysis services for the HRC and local fair housing organizations; and</li> <li>• Provide contact information and training opportunities to local fair housing organizations.</li> </ul>
<p><b>Impediment 2 - Lack of affordable housing development</b></p>	
<p>A. Expand the supply of affordable housing options</p>	<p>CSD will continue to support the use of public-private partnerships to increase quality, affordable housing in the county. Harris County will expand the supply of affordable housing options by providing or funding local providers to provide housing services that supports housing choice to 1,000 households which include but are not limited to homeownership, construction of new affordable housing units, and rental assistance in the next five years.</p>
<p>B. Preserve, rehabilitate, and increase the supply of quality affordable housing units</p>	<p>CSD will preserve and rehabilitate the supply of quality affordable housing units by providing or funding providers to provide housing services that supports housing choice to 300 households, which include but are not limited to minor home repair, reduction of lead hazards in housing, rehabilitation of housing units, and removal of dilapidated and unsafe housing structures.</p>

<p>C. Increase the availability of accessible and larger housing units</p>	<p>CSD requires within its Minimum Property Standards that all common areas and facilities as well as mail areas and spaces be designed to be handicapped accessible with particular attention given to the needs of the elderly and other special needs individuals. Additionally, all contractual agreements between CSD and project sponsors contain language that ensures construction projects adhere to all federal, state and local laws regarding accessibility of all newly constructed facilities to persons with disabilities. CSD will address this goal in the following ways:</p> <ul style="list-style-type: none"> <li>• Ensure that regulations are being followed through regular monitoring and compliance activities;</li> <li>• Require adherence to Section 504 requirements and when possible require a greater set aside for persons with mobility disabilities and visual/auditory disabilities (stricter terms than Section 504 requirements);</li> <li>• Require 5 percent of units contain at least three bedrooms in new construction rental housing projects funded in whole or in part by CSD targeted to families; and</li> <li>• Petition the Texas Department of Housing and Community Affairs concerning the Low Income Housing Tax Credit (LIHTC) awards for new construction of rental properties in the county to require projects to construct and reserve a greater number of units for disabled persons, large families and the homeless.</li> </ul>
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**Impediment 3 – Need to reduce areas of concentration**

<p>A. Deconcentrate areas of poverty and minority concentration</p>	<p>CSD will support affordable housing opportunities throughout the county, particularly in low poverty areas, limit subsidized housing concentrations, and encourage income diversity within subsidized developments and high poverty areas. CSD's Housing Concentration Policy encourages development of new subsidized affordable units for families and seniors in areas that are not saturated with subsidized units. CSD will address this goal in the following ways:</p> <ul style="list-style-type: none"> <li>• Develop an opportunity map identifying high and low opportunity areas for affordable housing development and encourage new construction of affordable housing in those areas;</li> <li>• Improve and create quality affordable housing opportunities in low poverty areas;</li> <li>• Support affordable housing outreach and education activities that combats opposition to affordable housing in high opportunity areas;</li> <li>• Continue instituting the Housing Concentration Policy to avoid the concentration of LIHTC and other types of HUD subsidized rental properties in any one area; and</li> <li>• Support the de-concentration of poverty and the inclusion of mixed income affordable housing development into community plans.</li> </ul>
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## Impediment 4 – Need to improve lack of quality community amenities

<p>A. Encourage the expansion of transit services</p>	<p>In order to address housing choice needs comprehensively, Harris County will consider methods to increase a community's level of opportunity. CSD will work with Harris County Transit and other local and regional transportation organizations to support the provision of transportation services within the county, especially in low- to moderate-income areas. This strategy will be addressed in the following ways:</p> <ul style="list-style-type: none"><li>• Attend and participate in the Regional Transportation Plan workgroups and meetings; and</li><li>• Provide technical support and mapping to Harris County Transit and local transportation organizations in identifying low opportunity, low- to moderate-income and or other underserved areas in need of linkages to quality housing, jobs and community facilities; and</li><li>• Harris County Transit will provide services to 2,000 people that link low-income areas to employment centers, social and health networks/facilities, and other opportunities.</li></ul>
<p>B. Ensure quality infrastructure</p>	<p>CSD will work to increase housing choice and increase opportunity by providing funding to local cooperative cities and utility providers to ensure quality infrastructure in low- to moderate-income communities, including improvement and provision of adequate streets, sidewalks, water systems, wastewater systems, and storm drainage sufficient to eliminate severe flooding problems. CSD requires that all public facilities as well as common spaces be designed to be handicapped accessible where appropriate. This goal will be addressed in the following ways:</p> <ul style="list-style-type: none"><li>• Review infrastructure proposals to determine if they inadvertently results in disparate treatment of members of protected classes;</li><li>• Consider environmental justice issues when siting infrastructure facilities such as wastewater treatment, solid waste disposal, or similar projects;</li><li>• Construct and improve 15 miles of roadways benefiting low-income areas for the purpose of improving the living environment and quality of life of 10,000 low- to moderate-income persons over the next five years;</li><li>• Provide improvements to 90,000 linear feet of water/sewer lines and 4 water/sewer facilities benefiting low-income areas for the purpose of improving the living environment and quality of life of 20,000 low- to moderate-income persons over the next five years;</li><li>• Construct and improve 3 miles of sidewalks/pathways benefiting low-income areas for the purpose of improving the living environment and improving the quality of life for 5,000 low- to moderate-income persons over the next five years;</li><li>• Construct and improve 1,000 feet of flood drains and controls benefiting low-income areas for the purpose of improving the living environment and quality of life of 5,000 low- to moderate-income persons over the next five years; and</li></ul>

<p>C. Ensure quality public facilities</p>	<p>CSD will work to increase the opportunity of low- to moderate-income neighborhoods by providing funding to improve or increase the number and quality of local public facilities. Recognizing that community centers and social service facilities are neighborhood gathering sites and key points for information dissemination, CSD will improve these facilities in order to better serve the surrounding constituents. CSD will use these centers to post fair housing posters, disseminate fair housing literature, and hold fair housing outreach activities. CSD will address this goal by providing improvements and/or the construction of 10 neighborhood or social service facilities.</p>
<p><b>Impediment 5 - Presence of community opposition towards affordable housing</b></p>	
<p>A. Provide education and outreach activities in order to counteract negative effects from NIMBYism and other community opposition</p>	<p>Many neighborhood based organizations and community groups have rallied against the idea of low-income developments because of the negative impressions often associated with the people living in these developments. Neighborhood opposition often cites a number of reasons for blocking affordable development, such as traffic considerations, overcrowded schools, crime, or decreased property values. CSD will work to mitigate the impacts of negative community opposition towards affordable housing development in the following ways:</p> <ul style="list-style-type: none"> <li>• Provide proactive strategies for education, outreach and marketing in high opportunity areas in order to build support among community residents;</li> <li>• Develop an anti-NIMBYism Action Statement; and</li> <li>• Require housing developers applying for CSD funding to conduct community engagement activities to educate the public and garner support for their housing proposal</li> </ul>
<p>B. Encourage the development of local ordinances that are more inclusive of affordable housing</p>	<p>Zoning and subdivision regulations can be used to make property too valuable to use for low-income housing and/or completely exclude affordable housing options. In order to make local ordinances more inclusive of affordable housing options, CSD will do the following:</p> <ul style="list-style-type: none"> <li>• Maintain a log of local cooperative city ordinances, noting factors that contribute to disparate impacts among protected classes in order to identify patterns and tailor outreach and training efforts;</li> <li>• Provide technical expertise to local municipalities; and</li> <li>• Provide fair housing training and education opportunities that address the impacts that local ordinances can have on affordable housing development.</li> </ul>

## Impediment 6 - Barriers created by credit and financial institutions

A. Provide financial education and outreach services	<p>Through many of its programs, CSD educates lenders, real estate agents, housing developers, service providers, and the general public on general housing and fair housing issues. The county seeks to protect homebuyers from predatory lending practices and overt discrimination, and educate homebuyers and renters of their rights under the law. CSD will continue to this goal in the following ways:</p> <ul style="list-style-type: none"><li>• Maintain a log of Home Mortgage Disclosure Act (HMDA) activity in order to identify patterns and evidence of disparate impacts on protected classes;</li><li>• Distribute 250 Downpayment Assistance Program (DAP) information packets to potential clients over the next five years at community events and housing fairs, to housing providers and advocates and on the CSD website;</li><li>• Refer 500 persons to housing counseling programs for education on homeownership, financing and housing choice over the next five years; and</li><li>• Train 100 mortgage lenders on fair housing and housing choice issues over the next five years.</li></ul>
B. Provide relief in areas of heavy foreclosure activity	<p>The CSD Neighborhood Stabilization Program (NSP) targets areas particularly affected by the foreclosure crisis, providing funding to acquire and redevelop abandoned and/or foreclosed homes and residential properties that otherwise might become sources of blight. CSD will address this goal in the following ways:</p> <ul style="list-style-type: none"><li>• Acquire 100 foreclosed homes in NSP target areas during the NSP program;</li><li>• Sell these homes to eligible NSP low-income homebuyers at an affordable amount; and</li><li>• Provide homeownership training and education to home buyers.</li></ul>