

April 14, 2016
Fair Housing Work Group
Meeting
4:00 p.m.



Julie M. Robinson, Chairperson
Andrea Greer, Secretary
Pastor Lorraine Brown, Data
Collection Chairperson
Pastor William H. King, III

AGENDA
City of Dickinson
**FAIR HOUSING WORK
GROUP**
REGULAR MEETING

Shamarion Barber
Commissioner Stephen Holmes
Ernest Hubert
Stephanie Russell
Alun Thomas

April 14, 2016

NOTICE is hereby given of an **ANNUAL REGULAR MEETING** of the Fair Housing Work Group for the City of Dickinson, County of Galveston, State of Texas, to be held on **THURSDAY, APRIL 14, 2016, at 4:00 p.m.** at: 4403 Highway 3, Dickinson, Texas 77539 in Conference Room 2 for the purpose of considering the following numbered items. The Fair Housing Work Group of the City of Dickinson, Texas, reserves the right to meet in a closed session on any of the below items should the need arise and if applicable pursuant to authorization by Title 5, Chapter 551, of the Texas Government Code.

ITEM 1.) CALL TO ORDER AND CERTIFICATION OF A QUORUM

ITEM 2.) CONSIDERATION AND POSSIBLE ACTION CONCERNING: Approval Of Minutes From October 15, 2015 Fair Housing Work Group Officers Meeting And October 15, 2015 Fair Housing Work Group Regular Meeting.

ITEM 3.) CONSIDERATION AND POSSIBLE ACTION CONCERNING: Election of Officers.

- A. Chairperson
- B. Secretary
- C. Data Collection Chairperson

ITEM 4.) BRIEFING, DISCUSSION AND DIRECTION CONCERNING: 2016 Housing Family Fair Held On Saturday, February 20, 2016 At Mt. Carmel Baptist Church And Data Obtained From Surveys Collected.

ITEM 5.) DISCUSSION AND DIRECTION CONCERNING: 2017 Housing Family Fair Currently Scheduled for Saturday, February 18, 2017.

ITEM 6.) CONSIDERATION AND POSSIBLE ACTION CONCERNING: Status Of Tasks Identified For Completion In 2016 In The City Of Dickinson's FFAST Form And Long-Term Plan For Affirmatively Furthering Fair Housing.

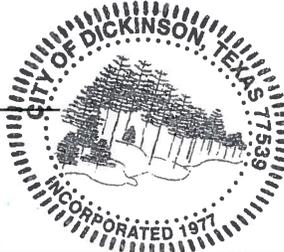
ITEM 7.) ADJOURN

CERTIFICATION

This is to certify that a copy of the Notice of the Annual Regular Meeting of the Fair Housing Work Group for **THURSDAY, APRIL 14, 2016** was posted on the bulletin board at City Hall, 4403 Highway 3, Texas, on this the 8th day of April, 2016, prior to 4:00 p.m.



Alun W. Thomas, Interim City Secretary



In compliance with the Americans with Disabilities Act, the City of Dickinson will provide reasonable accommodations for disabled persons attending City Council Meetings. Requests should be received at least 24 hours prior to the scheduled meeting, by contacting the City Secretary's office at 281-337-6217, or by FAX at 281-337-6190.

Fair Housing Work Group Meeting

CALL TO ORDER

**CITY OF DICKINSON, TEXAS
FAIR HOUSING WORK GROUP MEETING
ATTENDANCE LIST**

**MEETING DATE: APRIL 14, 2016
Regular Meeting**

<u>COMMITTEE MEMBERS</u>	<u>PRESENT</u>	<u>ABSENT</u>
JULIE M. ROBINSON, CHAIRPERSON	_____	_____
ANDREA GREER, SECRETARY	_____	_____
PASTOR LORRAINE BROWN, DATA COLLECTION CHAIRPERSON	_____	_____
PASTOR WILLIAM H. KING, III	_____	_____
SHAMARION BARBER	_____	_____
COMMISSIONER STEPHEN HOLMES	_____	_____
ERNEST HUBERT	_____	_____
STEPHANIE RUSSELL	_____	_____
ALUN THOMAS	_____	_____

Julie M. Robinson, Chairperson
Andrea Greer, Secretary
Pastor Lorraine Brown, Data
Collection Chairperson
Pastor William H. King, III

MINUTES
City of Dickinson
**FAIR HOUSING WORK
GROUP**
OFFICERS MEETING

Commissioner Stephen Holmes
Shamarion Barber
Ernest Hubert
Stephanie Russell
Alun Thomas

October 15, 2015

The Fair Housing Work Group for the City of Dickinson met in a duly called and announced **REGULAR MEETING** on **THURSDAY, OCTOBER 15, 2015**. The meeting was held in Conference Room 2 in Dickinson City Hall located at 4403 Highway 3, Dickinson, Galveston County, Texas 77539, and was held for the purpose of considering the following numbered items.

ITEM 1.) CALL TO ORDER AND CERTIFICATION OF A QUORUM

Chairperson Julie M. Robinson called the meeting to order at 3:35 PM. Mrs. Robinson called roll and certified a quorum. Officers present were as follows: Chairperson Julie M. Robinson and Secretary Andrea Greer. Also in attendance was Group Member Alun Thomas.

ITEM 2.) BRIEFING, DISCUSSION AND DIRECTION: Progress Report On Implementation Of City Of Dickinson Fair Housing Action Plan And Any Changes In Local Circumstances.

Group Member Alun Thomas provided a brief overview of the updates to the Progress Report and the implementation of the City's Fair Housing Action Plan. The officers discussed the implementation and Mr. Thomas noted there were still items on the progress report that require guidance from the State, which has not yet been provided. The officers determined that there were no changes in local circumstances or delays in the implementation of the City of Dickinson's Action Plan. No formal action was taken on this item.

ITEM 3.) ADJOURN

Secretary Andrea Greer made a motion to adjourn the meeting at 3:50 PM. Chairperson Julie M. Robinson seconded the motion.

VOTE:

2 AYES (Robinson and Greer)

0 NAYS

MOTION PASSED.

PASSED, APPROVED AND ADOPTED this the 14th day of April, 2016.

Julie M. Robinson, Chairperson

ATTEST:

Andrea Greer, Secretary

Julie M. Robinson, Chairperson
Andrea Greer, Secretary
Pastor Lorraine Brown, Data
Collection Chairperson
Pastor William H. King, III

MINUTES
City of Dickinson
**FAIR HOUSING WORK
GROUP**
REGULAR MEETING

Shamarion Barber
Commissioner Stephen Holmes
Ernest Hubert
Stephanie Russell
Alun Thomas

October 15, 2015

The Fair Housing Work Group for the City of Dickinson met in a duly called and announced **REGULAR MEETING** on **THURSDAY, OCTOBER 15, 2015**, at **4:00 p.m.**. The meeting was held in Conference Room 2 in Dickinson City Hall located at 4403 Highway 3, Dickinson, Galveston County, Texas 77539, and was held for the purpose of considering the following numbered items.

ITEM 1.) CALL TO ORDER AND CERTIFICATION OF A QUORUM

Chairperson Julie M. Robinson called the meeting to order at 4:00 PM, called roll and certified a quorum. Group Members present were as follows: Chairperson Julie M. Robinson, Secretary Andrea Greer, Group Member William King, Group Member Ernest Hubert, Group Member Stephanie Russell, and Group Member Alun Thomas.

ITEM 2.) CONSIDERATION AND POSSIBLE ACTION CONCERNING: Approval of Minutes from October 16, 2014 Fair Housing Work Group Meeting.

Group Member King made a motion to approve the Minutes of the May 7, 2015 meeting. A motion was made by Group Member King to approve the minutes and Group Member Hubert seconded the motion.

VOTE:

6 AYES (Greer, Hubert, King, Robinson, Russell, Thomas)

0 NAYS

MOTION PASSED.

ITEM 3.) CONSIDERATION AND POSSIBLE ACTION CONCERNING: Progress Report on Implementation of City of Dickinson Fair Housing Action Plan and any Changes in Local Circumstances.

Group Member Alun Thomas provided a brief overview of the updates to the Progress Report and the implementation of the City's Fair Housing Action Plan. Mr. Thomas noted there were still items on the progress report that still require guidance from the State, which has not yet been provided. The Fair Housing Work Group determined there were no changes in local circumstances.

Group Member King made a motion that the Progress Report be accepted. Group Member Thomas seconded the motion.

VOTE:

6 AYES (Greer, Hubert, King, Robinson, Russell, Thomas)

0 NAYS

MOTION PASSED.

ITEM 4.) BRIEFING, DISCUSSION AND DIRECTION CONCERNING: 2016 Housing Family Fair.

The Group discussed the upcoming 2016 Housing Family Fair. The 2016 Housing Family Fair will be at Mt. Carmel Missionary Baptist Church. Group Member Robinson noted that the church space has already been reserved for February 20, 2016.

No formal action was taken on this item.

ITEM 5.) BRIEFING, DISCUSSION AND DIRECTION CONCERNING: Fair Housing Work Group 2016 Meeting Schedule.

Group Member Robinson presented a proposed 2016 meeting schedule for the Fair Housing Work Group. It was the consensus of the Group that the 2016 meeting schedule was acceptable.

No formal action was taken on this item.

ITEM 6.) ADJOURN

Group Member King made a motion to adjourn the meeting at 4:25 PM. Group Member Russell seconded the motion.

VOTE:

6 AYES (Greer, Hubert, King, Robinson, Russell, Thomas)

0 NAYS

MOTION PASSED.

PASSED, APPROVED AND ADOPTED this the 14th day of April, 2016.

Julie M. Robinson, Chairperson

ATTEST:

Andrea Greer, Secretary

Optional Demographic Information

City or County where you are purchasing or renting	Number	Percent
Alvin	1	6.7%
Dickinson	2	13.3%
Galveston	2	13.3%
Harris	1	6.7%
Texas City	1	6.7%
No response	8	53.3%
Total	15	100.0%

Date of Closing or looking to purchase in the next 3,6 or 12 or more months	Number	Percent
Closing date provided:	0	0.0%
3 months	0	0.0%
6 months	0	0.0%
12 or more months	2	13.3%
No response	13	86.7%
Total	15	100.0%

Persons in Household	Number	Percent
1	0	0.0%
2	2	13.3%
3	1	6.7%
4	1	6.7%
5	0	0.0%
6	1	6.7%
No response	10	66.7%
Total	15	100.0%

Marital Status	Number	Percent
Single	3	20.0%
Married	3	20.0%
Separated	0	0.0%
Divorced	1	6.7%
Widowed	0	0.0%
Other or No Response	8	53.3%
Total	15	100.0%

Years in School

	Number	Percent
Less than High School	1	6.7%
High School	2	13.3%
Some College	2	13.3%
College Degree	0	0.0%
Advanced Degree	0	0.0%
No response	10	66.7%
Total	15	100.0%

Family Annual Income

	Number	Percent
Less than 10,000	0	0.0%
10,000-20,000	3	20.0%
20,000-30,000	0	0.0%
30,000-40,000	0	0.0%
40,000-50,000	0	0.0%
50,000-60,000	0	0.0%
60,000-70,000	0	0.0%
70,000-80,000	0	0.0%
80,000-90,000	0	0.0%
90,000-100,000	0	0.0%
More than 100,000	0	0.0%
No Response	12	80.0%
Total	15	100.0%

Ethnicity

	Number	Percent
Hispanic	3	18.8%
Non-Hispanic	4	25.0%
No response	9	56.3%
Total	16	100.0%

Race

	Number	Percent
American Indian/Alaskan Native	0	0.0%
Asian	0	0.0%
Black or African-American	2	13.3%
White	4	26.7%
Native Hawaiian or Other Pacific Islander	0	0.0%
Other	3	20.0%
No response	6	40.0%
Total	15	100.0%

Citizenship Status		
	Number	Percent
Citizen	7	46.7%
Permanent Resident	1	6.7%
Non-resident	0	0.0%
No response	7	46.7%
Total	15	100.0%

Survey Questionnaire

1. Have you ever owned a home		
	Number	Percent
Yes	5	33.3%
No	9	60.0%
No response	1	6.7%
Total	15	100.0%

2. Were you significantly impacted by Hurricane Ike		
	Number	Percent
Yes	7	46.7%
No	8	53.3%
No response	0	0.0%
Total	15	100.0%

Examples of impacts provided:
 Blow out window and roof
 Hotel expense
 Lost everything
 Home unusable

3. Are you aware of the protections of the Fair Housing Act?		
	Number	Percent
Yes	4	26.7%
No	9	60.0%
No response	2	13.3%
Total	15	100.0%

4. If you are not aware of the protections provided by the Fair Housing Act, would you like information about it?		
	Number	Percent
Yes	2	22.2%
No	7	77.8%
No response	0	0.0%
Total	9	100.0%

5. Have you had your Fair Housing Rights violated?

	Number	Percent
Yes	2	13.3%
No	13	86.7%
No response	0	0.0%
Total	15	100.0%

Examples of violations provided:

People were very ugly on phone from Galveston
Access to services

6. What barriers to home ownership have you experienced or do you think exist in Dickinson?

Examples provided:

Upkeep, remodelling
Credit
Income
I do not own yet

7. Do you think there is adequate affordable housing and affordable housing programs being offered in Dickinson?

	Number	Percent
Yes	8	53.3%
No	2	13.3%
Unsure or No Response	5	33.3%
Total	15	100.0%

8. Did you have a particular question about housing when you came to the Housing Family Fair?

If so, what were they?

Examples provided:

Affordable financing for remodelling
How to buy or get a house
How to own a home with low income and no money in the bank
How to rent a home
How to improve my community

9. Do you feel the Housing Family Fair provided adequate answers to the questions you had?

	Number	Percent
Yes	13	86.7%
No	0	0.0%
No response	2	13.3%
Total	15	100.0%

10. Would you attend or like to see our City host another Fair Housing event?

	Number	Percent
Yes	13	86.7%
No	0	0.0%
No response	2	13.3%
Total	15	100.0%

11. What topics would you like to see added or additional information supplied?

Examples provided:

- More realtors
- Home repair/renovation
- Instant housing
- Area and community
- More service in Spanish

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 AI 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 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.

<u>Impediment #3</u>	The public is not sufficiently aware of their Fair Housing rights and how to obtain the assistance necessary to protect those rights.
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1. Consistent with the Fair Housing Act, TDHCA, TDRA, 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 or proclamation by our governing body.

The City of Dickinson has established either the month of March or April as "Fair Housing Month" in 1993, 1994, 1996, 2001, 2004, 2009, 2010, and 2011, and will continue to do so in the coming years.

Activities in schools.

Placing posters in public buildings.

Posters and brochures are currently being developed and will be displayed upon completion in City-owned buildings.

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

Other. Please specify.

In addition to the above activities, the City of Dickinson is adding a Fair Housing page to the City's website that will be updated as needed to keep information current, and the City of Dickinson plans on conducting a Housing Fair annually to provide information to attendees on Fair Housing rights, housing assistance programs, and other information that may be of interest to attendees.

When will you undertake these activities? 2011 2012 2013

Not Applicable (Explain)

2. Consistent with the Fair Housing Act, TDHCA, TDRA 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 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

On February 26, 2011, the City of Dickinson conducted its first Housing Family Fair to provide citizens with direct access to housing information. The Housing Family Fair provided attendees with an opportunity to learn about community resources and housing programs available to residents, and more than 150 people attended the event. A copy of the flyer for the Housing Family Fair is attached. Some of the organizations that participated were South East Texas Housing Finance Corporation, Bay Area Habitat for Humanity, Galveston County Water Control & Improvement District #1, Galveston County Health District, Bayou Realtors, and United Realtors.

As resources allow, the City of Dickinson will undertake additional fair housing activities during the year.

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. Specific examples of prior actions by communities are listed in HUD's Fair Housing Guide: Volume 2. pages 7-106 -- 7-110 and includes a number of examples that communities have used to mitigate NIMBY opposition. 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.]

The City of Dickinson plans to develop an anti-NIMBYism action plan; however, the City has been working to mitigate NIMBY attitudes over the past year albeit without a formal or written anti-NIMBYism action plan. In September of 2010, the City formed a Fair Housing Advisory Committee (now the Fair Housing Work Group) that, over the past year, has considered and implemented various strategies for education, outreach and marketing to provide accurate information and promote the positive aspects and benefits of affordable housing to build support within the community. Once the City has received direction from the General Land Office concerning the format and substance of the action plan, the Fair Housing Work Group will be responsible for developing an anti-NIMBYism action plan that will be presented to the Dickinson City Council.

When will you do this? 2011 2012 2013

^[1] "In the face of NIMBY attitudes grantees can adopt a stance that in essence goes along with them or strongly counters such sentiments with positive actions to overcome them and allay fears and concerns with facts." HUD's Fair Housing Guide: Volume 2, pg 7-106

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 in Appendix F 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.

The City of Dickinson does not have a formal Capital Improvement Program and does not have a Comprehensive Plan. The City of Dickinson utilizes a Street Prioritization Program to rank each street based on traffic counts, date of last construction, and existing condition. The lower the overall rank number, the worse the street is and the higher the prioritization it receives. The City has already reviewed the Street Prioritization Program and determined that it meets this objective.

As a Round 1 project, the City of Dickinson undertook the development of a Comprehensive Drainage Study to identify drainage issues throughout the City and develop recommended actions to resolve major drainage issues. The Comprehensive Drainage Study was completed in October of 2010 and adopted by the City Council. Since that time, the City has completed 50% of the Hot Spot projects identified in the Study, and will continue to work on the different projects recommended in the Study until all Hot Spots have been addressed. The Comprehensive Drainage Study has also been reviewed, and the City has determined that it meets this objective.

The City of Dickinson does not provide water and wastewater services to its residents. Water and wastewater is provided by Galveston County Water Control & Improvement District #1, which is a separate governmental entity. Consequently, all water and wastewater infrastructure is owned by GCWCID#1, and any long-term infrastructure plan related to water and wastewater would be developed by GCWCID#1. The City of Dickinson has met with GCWCID#1 and requested that GCWCID#1 review its water and wastewater master plan to determine if it promotes racial concentrations or otherwise inadvertently results in

disparate treatment of members of protected classes as it related to the availability of housing.

When will you do this? 2011

- 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.
- We will use the information in Appendix (X) of 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

The City of Dickinson's compliance with this objective is contingent upon the provision of guidelines by the State.

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

When will you do this? 2011 2012 2013

Though it was not mandated, the Chief Building Official and Assistant Building Official attended the "Race, Place and Fair Housing" Seminar presented by the University of Texas School of Law in October of 2010. To the extent possible and resources are available, the City of Dickinson will provide opportunities for senior staff and members of the Fair Housing Work Group to receive Fair Housing training on a regular basis.

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.]

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.]

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

As explained in response to Impediment #5, Action Item 1 above, the City of Dickinson does not provide water and wastewater services to its residents. Water and wastewater is provided by Galveston County Water Control & Improvement District #1, which is a separate governmental entity. Consequently, all water and wastewater infrastructure is owned by GCWCID#1, and any long-term infrastructure plan related to water and wastewater would be developed by GCWCID#1. The City of Dickinson will meet with GCWCID#1 and request that GCWCID#1 consider developing formal limits or official policies and procedures that take the residential location of members of protected classes into account with regard to the locations of undesirable water and wastewater infrastructure improvements.

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)

The City of Dickinson does not provide publicly-financed housing incentives at this time. Galveston County is administering the housing assistance program through which Dickinson residents may obtain assistance. Galveston County has adopted an Affirmative Marketing Plan that meets this objective. In the event that the City of Dickinson provides such incentives at some point in the future, a policy requiring Affirmative Marketing Plans from developers seeking tax abatements or other supports for new housing will be developed.

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 plan to develop a process to consider making housing funding applications when funds for infrastructure projects are sought.

When will you do this? 2011 2012 2013

The City of Dickinson has participated in the HOME Program on different occasions in the past in an effort to provide assistance to residents to repair substandard housing; however, the City's decision to participate in the HOME Program has not been part of a formal process. Due to the limited availability of HOME Program funds and the matching requirement associated therewith, the City of Dickinson may not be able to participate in the HOME Program or other housing assistance programs each time it seeks funds for infrastructure projects. Therefore, the City of Dickinson cannot adopt a formal process as it relates to this objective.

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.
- We do not have such a requirement. We will develop one after receiving guidelines from the State.

When will you do this? 2011 2012

- 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 (FHAAT) 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 will submit a FHAAT 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

- 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 TDRA 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.
- 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)

Since the City of Dickinson is not administering any housing recovery funds, this action step does not apply for Dickinson. Galveston County is administering the housing assistance program through which Dickinson residents may obtain assistance. Galveston County's policy is to elevate and accommodate structures in the floodplain rather than deny applicants' access to disaster recovery CDBG funds.

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

Not Applicable (Explain)

The City of Dickinson is not entirely in a flood plain.

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.

^[3] Texas Government Code Section 2306.514

- 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)

Since the City of Dickinson is not administering any housing recovery funds, this action step does not apply for Dickinson. All housing recovery funds are being administered by Galveston County, and Galveston County is utilizing a Moving to Opportunity Program. Dickinson will, however, cooperate with the Program Administrator to ensure effective results in the Moving to Opportunity Program in its jurisdiction.

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)

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.]
- 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 Julie M. Johnston, City Administrator.

When will you do this? 2011 2012

- 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)

At the time of Hurricane Ike, there were no family or elderly public housing units within the City of Dickinson. Therefore, there are no family or elderly public housing units that need to be reconstructed within the City of Dickinson.

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, please contact _____.

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

When will you do this? 2011 2012 2013

Not Applicable (Explain)

The City of Dickinson does not have the resources to develop a testing program for Fair Housing violations. In the event that the State of Texas or some other governmental entity provides a testing program in which

the City may participate, the City of Dickinson will consider participating therein.

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

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.
The City of Dickinson's Fair Housing Page on its City website may be found at <http://www.ci.dickinson.tx.us/fairHousing.html>.
 - 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 TDRA and 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.]

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]

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.

We will begin keeping required logs and records based on guidance given by the State in 2011.

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.

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

Not Applicable (Explain)

Since the City of Dickinson is not administering any housing recovery funds, this action step does not apply for Dickinson. All housing recovery funds are being administered by Galveston County, and Galveston County has or will develop remedial procedures. However, the City of Dickinson will cooperate with

Galveston County and the State on the development of statewide and/or regional remedial measures to be undertaken.

<u>Impediment #7</u>	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.
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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

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

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 have not done so but will to the extent possible.

When will you do this? 2011 2012 2013

- Not Applicable (Explain)

The City of Dickinson does not have the resources to offer incentives to developers to locate affordable housing projects in high opportunity neighborhoods and therefore cannot commit to offering "incentives". However, to the extent possible, the City will offer expedited permitting and review processes for affordable housing projects within high opportunity target zones.

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.

During the post-like recovery period, the City of Dickinson passed a moratorium on zoning restrictions to allow temporary housing on existing lots during the process of rebuilding so that residents could remain on their property while repairing or rebuilding their home. The City will consider passing another moratorium or waiver if another disaster occurs to ensure that residents are able to remain on their property..

- 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.
 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.
- 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 for best practices on working with supportive services.

When will you do this? 2011 2012 2013

- Not Applicable (Explain)

<u>Impediment #10</u>	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.
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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.

<u>Impediment #11</u>	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.
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No local action is required at this time. TDRA and 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.

<u>Impediment #12</u>	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.
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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 2012

It should be noted that, while the City of Dickinson has not formally adopted a Section 3 program, the City is currently requiring the contractors that are working on Disaster Recovery CDBG projects to sign a Section 3 Plan (Local Opportunity Plan) and Section 3 language is part of the contract documents.

Impediment #13 Location and lack of housing accessibility and visitability standards within political jurisdictions limits fair housing choice for persons with disabilities.

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)

Since the City of Dickinson is not administering any housing recovery funds, this action step does not apply for Dickinson. All housing recovery funds are being administered by Galveston County. Galveston County has accessibility standards that are applicable to federally funded housing construction. Any requirements for TDHCA would be the responsibility of TDHCA and not the City of Dickinson.

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)
The City of Dickinson does not have a colonia.

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.]
 - We have not done so but do so in compliance with TDRA and TDHCA guidance.

When will you do this? 2011 2012 2013

- Not Applicable (Explain)
Since the City of Dickinson is not administering any housing recovery funds, this action step does not apply for Dickinson. All housing recovery funds are being administered by Galveston County.
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.

Please see the attached Revised Long-Term Plan to Affirmatively Further Fair Housing.

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

When will you do this? 2011 2012 2013

- Not Applicable (Explain)

Dickinson Housing Family Fair

Saturday, February 26, 2011

10am to
2pm

**Mt Carmel Baptist Church
2920 Highway 3
Dickinson, TX 77539**

If you have questions...

- How do I get good credit?
- Can I afford my own home?
- Is there help for first time homebuyers?

We have answers!

The City of Dickinson invites you to learn about local community resources available to our residents. We will have industry professionals available to answer your questions and provide information about: Credit Counseling, First Time Homebuyer Programs, Home Builders, Lenders and Homebuyer Education Providers.

Admission and the information is free. Food, drinks and the children's activities are no cost. Door Prizes given away each hour. Come enjoy your day with us!



Free Kids Activities

- **Face Painting**
- **Arts and Crafts**
- **Hot Dogs**
- **Popcorn**
- **Child Identification**
- **Door Prizes**

For more information call 281-534-4367.





LONG-TERM PLAN FOR AFFIRMATIVELY FURTHERING FAIR HOUSING IN THE CITY OF DICKINSON CALENDAR YEARS 2010-2015

Revised September 2011

With a population of under 50,000, the City of Dickinson, Texas (“the City” or “Dickinson”), is a non-entitlement city with regard to Community Development Block Grant (“CDBG”) funding and therefore does not receive a direct allocation from the U. S. Department of Housing and Urban Development (“HUD”). As such, the City may only obtain CDBG funds through the competitive grant process administered either by the Houston-Galveston Area Council (“HGAC”) or Texas Department of Housing and Community Affairs (“TDHCA”), and separate funding for the City to undertake initiatives to aggressively affirmatively further fair housing is non-existent. To the extent possible and as resources may be allocated, however, Dickinson has previously, is currently, and will in the future undertake initiatives to affirmatively further fair housing within the City limits.

Impediments Identified by Texas Department of Housing and Community Affairs in January 2003 Analysis of Impediments

As a non-entitlement city, the City of Dickinson is not required to conduct its own Analysis of Impediments to Fair Housing (“AI”). Consequently, the City has reviewed and relies upon the State of Texas AI for purposes of planning activities aimed at affirmatively furthering fair housing within the City of Dickinson. The January 2003 Analysis of Impediments conducted by the State of Texas (“State”) revealed a number of impediments to fair housing including, but not limited to:

- A severe shortage of affordable housing stock and a shortage of funding sources to assist in the development of the housing stock.
- A lack of organizational capacity to produce affordable housing stock.
- A lack of knowledge of available resources to address a community’s needs with regard to affordable housing stock.
- Local objections to low-income housing.
- The adoption by municipalities of zoning, development, and building regulations and processes that significantly increase the cost of construction and thus the median price of a home which ultimately prevents households from qualifying to buy a home.
- The establishment of deed restrictions by private property owners on developed land that prevents affordable housing stock and/or prevents households from qualifying to buy a home.

- Overlapping government authority over housing construction that causes delays and adds to costs of construction.
- The implementation of environmental regulations at the state and federal levels that increase the costs of construction.
- Various issues with insurance companies and real estate professionals that deny fair housing opportunities to disabled persons.
- Ignorance of the requirements of the Fair Housing Act.

Impediments Identified by Texas Department of Housing and Community Affairs in 2011 Phase I Analysis of Impediments for Hurricane Impacted Communities

In 2010 fair housing complaints were filed against the State regarding the distribution and use of disaster recovery funds. To resolve the complaints, the State and HUD entered into a Conciliation Agreement which required the State and TDHCA to update the State AI, addressing the impediments to fair housing in hurricane impacted communities that are eligible to receive CDBG disaster recovery funds. The Phase I AI identified a number of related or similar impediments to those identified in the 2003 AI. However, the Phase I AI identified impediments related specifically at the challenges to fair housing facing hurricane impacted communities and provided recommended actions for communities to consider as they work to affirmatively further fair housing. As a recipient of CDBG disaster recovery funds and pursuant to the City's Long-Term Plan to Affirmatively Further Fair Housing, the City has reviewed the updated AI and will continue to rely on both the 2003 State AI and the 2011 Phase I AI for planning activities aimed at affirmatively furthering fair housing. The Phase I AI revealed additional impediments to fair housing in hurricane impacted communities that should be considered by the City including, but not limited to:

- A lack of information available to the real estate community, governments and the public sector about fair housing requirements and enforcement procedures.
- Insufficient public awareness of Fair Housing rights and how to obtain the assistance necessary to protect those rights.
- Local attitudes and objections to fair housing, including local actions that limit fair housing choice for persons with disabilities.
- The existence of governmental policies and practices that may not meet current HUD policy, fail to address mal-distribution of resources, and unnecessarily restrict housing choice.
- A lack of proactive enforcement of the Fair Housing Act and the obligation to affirmatively further fair housing.
- Some local jurisdictions continue to have zoning codes, land use controls, and administrative practices that impede free housing choice and fail to affirmatively further fair housing.
- Inadequate planning for re-housing after an emergency situation that creates long-term displacement of protected classes.

- The existence of barriers to mobility and free housing choice for Housing Choice Voucher holders, including 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.
- The loss of housing stock resulting from Hurricanes Dolly and Ike that has compounded the shortage of affordable housing in disaster recovery area.
- Location and lack of housing accessibility for in housing for persons with disabilities.
- Lack of adequate Analysis of Impediments to Fair Housing or Fair Housing Plans and lack of sufficient records of their activities.

Actions Previously and Currently Being Undertaken to Affirmatively Further Fair Housing

Housing Activities. The City of Dickinson has undertaken numerous activities over the years that affirmatively further fair housing. In 1991, the City of Dickinson sought and obtained CDBG housing funds through the competitive grant process with Houston-Galveston Area Council ("HGAC") for the purpose of administering housing programs to assist low-to-moderate income residents in constructing, reconstructing or rehabilitating residential structures within the City limits. In 1994, the City of Dickinson utilized funds through the HOME Program to rehabilitate 27 homes in the Moore's Addition, one of the City's low-to-moderate income areas. The City also utilized a 2004 HOME Program to reconstruct 9 homes within the City limits for minority homeowners and to provide a 25% local match for approved participants.

The City currently works in collaboration with Bay Area Houston Habitat for Humanity to identify properties within the City that may meet the organization's selection criteria for build sites. Additionally, the City works in collaboration with Southeast Texas Housing Finance Corporation to direct potential homebuyers to the appropriate program for assistance. The City has also worked directly with the broker for a property in Dickinson owned by TDHC to market the affordable housing site to possible developers. The City has developed these partnerships to mitigate impediments related to the lack of knowledge or fair housing requirements and the lack of affordable housing stock in the community. The Phase I AI has recommended continuing partnerships like these in order to provide opportunities in the community to affirmatively further fair housing.

Additionally, the City of Dickinson has established either the month of March or April as "Fair Housing Month" in 1993, 1994, 1996, 2001, 2004, 2009, 2010 and 2011.

The City of Dickinson is not currently administering any housing programs for which Hurricane Recovery Funds are or will be utilized. Any such housing programs are being administered by Galveston County on behalf of the City of Dickinson and Hurricane Ike CDBG housing funds have been directly allocated to Galveston County for this purpose.

Infrastructure Improvements. The City of Dickinson is aware that infrastructure problems perpetuate segregation and therefore equate to impediments to fair housing. However, street and drainage projects have historically been determined not to be priority projects through the competitive CDBG program with HGAC, thus Dickinson has not sought CDBG funding for such projects. Additionally, Dickinson's financial resources for undertaking street and drainage projects have been limited over the years. Consequently, Dickinson has only been able to undertake a limited number of street and drainage projects each year on a pay-as-you-go basis. With the significant amount of infrastructure damage that resulted from Hurricane Ike, the City simply cannot fund all of the repairs that are necessary. Thus, the City is seeking funding through the 2008 Supplemental Disaster Recovery Fund Program for a variety of infrastructure projects that will directly and affirmatively further fair housing.

In 1994, 1999, 2005, and 2007, the City of Dickinson sought and obtained regular CDBG funds on behalf of Galveston County Water Control & Improvement District #1 ("GCWCID #1"), the City's water and sewer provider, through the competitive grant process through HGAC for the purpose of undertaking water and sewer infrastructure rehabilitation projects that directly benefit low-to-moderate income areas within the City limits.

Mitigation of Impacts to Costs of Construction Resulting from Local Building and Development Regulations. One of the specific impediments to fair housing identified in the 2003 State AI is impact fees. The City of Dickinson has not adopted impact fees and does not intend to adopt impact fees. Thus, this impediment does not exist for the City of Dickinson.

Another impediment identified in the 2003 State AI is the adoption by cities of various building codes and local amendments thereto. The 2003 State AI included a suggestion that cities should be encouraged to adopt a single code and limit local amendments thereto in order to reduce the patchwork of building code regulations and reduce construction costs. The City of Dickinson adopted the International Residential Code and the National Electric Code (that governs commercial electrical installations) in 2001, and in 2006 adopted the International Building Code, International Fire Code, International Plumbing Code, International Mechanical Code, International Energy Conservation Code, and International Fuel Gas Code. For each of the single codes adopted by the City, local amendments thereto were minimal. As it has evaluated the adoption of updated single codes and any local amendments thereto, Dickinson has constantly evaluated the impact of the code provisions and local amendments on construction costs to ensure that costs are not increased to the point that construction is discouraged.

Dickinson has worked diligently particularly in the last four years to streamline its building and development processes to improve efficiency and reduce costs of construction. The City's Community Development Department serves as a one-stop shop for building and development-related permits and issues, working collaboratively with GCWCID #1 – thus overcoming the overlapping government authority impediment

identified in the 2003 State AI. Additionally, the City has quickly responded to regulatory issues identified by real estate professionals, developers, and property owners as impediments to efficient development: specifically, when the lack of a procedure for administrative approval of minor plats was identified in 2009, City staff immediately brought forward and Council approved an ordinance establishing such a procedure. In the summer of 2010, a new software system was implemented to further streamline the City's processes.

Reduction of Segregation of Protected Classes. The 2003 State AI indicated that segregation from the general public exists particularly for persons with special needs. In early 2010 and as a result of a grant received for this purpose, the City of Dickinson began working with Connect Transit, the mass transit provider for Galveston and Brazoria Counties, to develop and implement fixed-route bus service that would operate in the City of Dickinson and provide connections to routes in Texas City and the San Leon/Bacliff areas. There was specific thought given to the route of the buses to ensure that most, if not all, of the protected classes would benefit from the bus stop locations. The Gator Run Fixed-Route Bus Service began operation in April of 2010 and each of the buses utilized are handicap-accessible. Since April, ridership has steadily increased, and Dickinson Management District Number 1 has provided the local match needed to continue the Gator Run Service through Fiscal Year 2010-2011. The implementation of the Gator Run Service has reduced the segregation or isolation of the protected classes throughout the community and expanded economic opportunities for protected classes by providing consistent, affordable transportation that prior to 2010 did not exist. Thus, the Gator Run Fixed-Route Bus Service assists the protected classes in achieving self-sufficiency – one of HUD's performance measure objectives. It is the City of Dickinson's intent to continue to work with Connect Transit to provide the Gator Run Fixed-Route Bus Service and to expand the route and connections to other routes to enable even greater access for protected classes.

Creation of Fair Housing Advisory Committee. In September of 2010, the City established a Fair Housing Advisory Committee ("FHAC") created of representatives of different protected classes as well as representatives from Bay Area Houston Habitat for Humanity, South East Texas Housing Finance Corporation, and the Ministerial Alliance. The purpose of the FHAC is to discuss and identify potential impediments to fair housing that may exist within the City of Dickinson either from a regulatory or practical standpoint. The FHAC met for the first time on September 16, 2010, and plans on meeting on a monthly basis as it gets ramped up to address fair housing issues and determine solutions to such issues. City staff has reviewed the updated AI and will present the information to the FHAC to update the future activities of the City's Long-Term Plan for Affirmatively Furthering Fair Housing. In both the 2003 AI and the Phase I AI, the State identified a lack of community support for housing activities as a barrier. The creation of a Fair Housing Advisory Committee allows the City to reach out to the community and develop relationships and attitudes of support for fair housing projects.

Training and Recordkeeping. The Phase I AI identified staff training as an important action for funding recipients to take to ensure that staff are educated on fair housing

policies and enforcement procedures and can then identify possible impediments in their own communities. As such, City staff attended the Race, Place & Fair Housing seminar presented by the University of Texas School of Law in October 2010, and annual fair housing training will continue in the future.

Public Information. The Phase I AI also described a lack of publicly available information as an impediment to fair housing since many local citizens, real estate agencies, and the general public does not understand the rights provided under the Fair Housing Act and are not aware of the enforcement procedures. In order to reduce this impediment, City staff is developing fair housing information for distribution at City Hall and the Dickinson Public Library and, once developed, will also be distributed to housing developers through the Community Development Department. The City is also developing a Fair Housing webpage that will provide descriptions of relevant laws and provide the public with instructions on how to file fair housing complaints.

In order to provide citizens direct access to housing information, the City of Dickinson hosted its first Housing Family Fair on February 26, 2011. The Housing Family Fair provided attendees with an opportunity to learn about community resources and housing programs available to residents. Industry professionals were on hand to answer questions and provide information about credit counseling, first time homebuyer programs, lenders and homebuyer education providers for more than 150 people who attended. Based on the response to the first Housing Family Fair, the City plans to host such an event on an annual basis.

Emergency and Disaster-Related Activities. The Phase I AI recommended that cities review their policies to ensure that government actions do not intentionally or unintentionally restrict accessibility to housing for persons with disabilities. Communities in hurricane-impacted areas have to address the ability to communicate with all of their residents in a timely fashion during emergency situations. The failure to provide access to emergency information can limit the accessibility of that community to disabled persons. The City is currently exploring options for ensuring that City information will be equally available to all residents, regardless of disability. Currently, the City is working to make the Connect CTY system accessible for residents with auditory disabilities and is looking into other access issues for protected classes to City information and alerts.

Post-disaster redevelopment can also be an impediment to fair housing since low income persons may be restricted by zoning requirements that limit temporary housing from returning to their communities. The City addressed this issue after Hurricane Ike by passing a moratorium that waived restrictions on temporary housing on existing lots so that residents could remain on their property in temporary housing while waiting for redevelopment to occur. In the event that another incident occurs, the City will consider passing a similar moratorium and/or taking other actions that would facilitate post-disaster redevelopment within the City. This will address the impediment of inadequate planning for re-housing identified by the State.

Activities Undertaken Through the Round 2, Phase I Application for Disaster Recovery CDBG Program to Affirmatively Further Fair Housing

On September 13, 2008, Hurricane Ike made landfall in Galveston County, Texas. This storm severely impacted all of Galveston County from 100+ mph winds but severely impacted low lying areas because of a devastating Category 4 type storm surge associated with Hurricane Ike. Dickinson Bayou runs east and west through the entire City limits of Dickinson and several tributaries to Dickinson Bayou extend throughout the City. Additionally, a significant portion of the low-to-moderate income areas lie within the 100-year floodplain. As a result of the storm surge, housing, infrastructure, and businesses were all impacted by the storm and many were destroyed. Due to the extent of the damages from Hurricane Ike and resulting exponential cost of repairs thereto, the City of Dickinson seeks to find solutions to the problems created by Hurricane Ike by identifying needs and addressing those needs through various actions, including utilizing the CDBG Disaster Recovery Program. As such, the City of Dickinson has sought funding for the following projects that the City has determined to be priorities and cannot effectively be carried out without Hurricane Recovery Funds. The projects serve primarily low to moderate income areas and broaden the City's effort to Affirmatively Further Fair Housing.

- Sewer Rehabilitation along Kansas Avenue. During Hurricane Ike, the storm surge inundated the sewer system with bay water and rain water. Because of the condition of the existing lines in this area, the storm water infiltrated the system rendering the system inoperable and causing a failure to function through backups of sewerage for houses, into streets, and into drainage areas. The existing sewer system conditions negatively impact residents' health, safety, and welfare. This project addresses local needs identified in public hearings and removes an impediment to fair housing regarding access and equalized service delivery by providing substantially improved sewer system conditions. Proposed is pipe bursting of 5650 LF of 8 inch Sewer Line and 1000 LF of 10 inch Sewer Line along Kansas Avenue. This area is an area of primarily low to moderate income residents and also an area of concentrated protected classes.

- Installation of Back Up Electrical Systems for Sewer Lift Stations in the City. During Hurricane Ike, electrical power was lost and, because of the lack of a back up electrical system, the sewer system could not operate in certain areas. The result was a failure to function from a backup of sewer flow which was exacerbated by the infiltration from heavy rains and storm surge. Proposed is the installation of a backup system that can operate lift stations during power outages and can pump out the excess flow. Backup electrical systems are proposed at the following locations:
 - Sunset Drive Lift Station
 - Hopkins Road Lift Station

- Deats Road Lift Station
- 26th Street Lift Station
- Barber Middle School Lift Station

These projects address local needs identified in public hearings and remove impediments to fair housing regarding access and equalized service delivery by providing substantially improved sewer system conditions. These areas are areas of primarily low to moderate income residents and also areas of concentrated protected classes.

- Drainage Improvements resulting from the storm surge and heavy rain. During Hurricane Ike, several areas flooded as a result of storm surge and heavy rains backing up bayous and drainage ways throughout the City. Many of the roadway drainage areas were inadequate to handle such a flow. This created a failure to function by flooding the neighborhoods and streets and by trapping residents within their homes and preventing emergency personnel from providing services to the area. These projects proposed will improve drainage conditions for these areas to insure that residents and emergency personnel have adequate access. Drainage improvement projects are proposed for the following areas:

- Timber Drive between 22nd and 23rd Streets
- Belmont Street between Oak Ridge and Sunset Drive
- Holly Drive West of Timber Drive
- Avenue I South of Deats Roads
- Avenue G (Phase 1 – Falco Street to 26th Street)
- Bayou Circle

The existing drainage system conditions negatively impact residents' health, safety, and welfare. These projects address local needs identified in public hearings and remove impediments to fair housing regarding access and equalized service delivery by providing substantially improved drainage system conditions. These areas are areas of primarily low to moderate income residents and also areas of concentrated protected classes.

The projects submitted in the Round 2, Phase I Disaster Recovery CDBG program were selected in consideration of infrastructure, housing and overall community recovery. The Houston-Galveston Regional Council Regional Hazard Mitigation Plan lists as a priority goal the identification and implementation of hazard mitigation projects to reduce the impact of hazard events and disasters. Construction of each of the identified projects will repair damages caused by Hurricane Ike and reduce the impact of future hazard incidents on property owners, which will reduce flood insurance costs to homeowners and protect investment of additional disaster recovery funds in rehabilitation and reconstruction of homes in the neighborhoods in which the projects are undertaken, which are needed to support the workforce necessary to reopen businesses and attract new ones.

Activities To Be Submitted Through the Round 2, Phase II Application for Disaster Recovery CDBG Program to Affirmatively Further Fair Housing

As discussed above, due to the extent of the damages from Hurricane Ike and resulting exponential cost of repairs thereto, the City of Dickinson seeks to find solutions to the problems created by Hurricane Ike by identifying needs and addressing those needs through various actions, including utilizing the CDBG Disaster Recovery Program. As such, the City of Dickinson will seek funding through the Round 2, Phase II Application for Disaster Recovery CDBG Program ("Round 2, Phase II Application") for a number of projects that the City has determined to be priorities and cannot effectively be carried out without Hurricane Recovery Funds. The projects are anticipated to serve primarily low to moderate income areas and broaden the City's effort to Affirmatively Further Fair Housing. The projects that are ultimately submitted in the Round 2, Phase II Application will also be selected in consideration of infrastructure, housing and overall community recovery needs. While the City of Dickinson is currently evaluating different projects to be submitted in the Round 2, Phase II Application, some of the projects anticipated to be included are:

- Installation of Back Up Electrical Systems for Sewer Lift Stations in the City. During Hurricane Ike, electrical power was lost and, because of the lack of a back up electrical system, the sewer system could not operate in certain areas. The result was a failure to function from a backup of sewer flow which was exacerbated by the infiltration from heavy rains and storm surge. The installation of a backup system that can operate lift stations during power outages and can pump out the excess flow will be proposed. Backup electrical systems will be proposed at the following locations:
 - Gum Drive Lift Station
 - Dickinson Avenue Lift Station

These projects will address local needs identified in public hearings and removes impediments to fair housing regarding access and equalized service delivery by providing substantially improved sewer system conditions. These areas are areas of primarily low to moderate income residents and also areas of concentrated protected classes.

- Drainage Improvements resulting from the storm surge and heavy rain. During Hurricane Ike, several areas flooded as a result of storm surge and heavy rains backing up bayous and drainage ways throughout the City. Many of the roadway drainage areas were inadequate to handle such a flow. This created a failure to function by flooding the neighborhoods and streets and by trapping residents within their homes and preventing emergency personnel from providing services to the area. Drainage projects that are submitted in the Round 2, Phase II Application will improve drainage conditions for these areas to insure that residents and emergency personnel have adequate access. Some of the

drainage improvement projects that will be proposed include, but are not limited to:

- Avenue G (Phase 2 – 26th Street to 20th Street)
- Central Street
- Pine Grove Drive
- Pine Manor Lane
- 29th Street
- Avenue F
- Gill Road
- Greenbriar Street
- Manor Lane
- 30th Street
- Oak Drive
- 32nd Street
- Sweeney Drive
- Avenue H
- Colorado Avenue
- Galveston Avenue
- 26th Street
- Texas Avenue
- Wagon Road
- Green Lee Lane
- Colonial Drive
- Maple Drive

The existing drainage system conditions negatively impact residents' health, safety, and welfare. These projects address local needs identified in public hearings and remove impediments to fair housing regarding access and equalized service delivery by providing substantially improved drainage system conditions. These areas are areas of primarily low to moderate income residents and also areas of concentrated protected classes.

Future Actions to Affirmatively Further Fair Housing

Based on the impediments identified in the 2003 and 2011 Phase I State AI, the City of Dickinson has identified the following actions for eliminating and/or mitigating as many of the impediments that may exist in the City.

Impediment #1: Housing consumers as well as housing providers are not fully aware or knowledgeable of the fair housing laws, discriminatory practices, enforcement agencies, and the proper procedures involved with any fair housing issues.

Future Action: The City will take all appropriate actions in order to promote community awareness and educate the public on fair housing laws and regulations. Some of the steps that will be undertaken to address this impediment are:

- Create a Fair Housing page on the City's website and post fair housing information, including a description of the Fair Housing Act and providing a method for reporting suspected noncompliance to the State and HUD (update as necessary)
- Distribute fair housing information at City Hall and Dickinson Public Library (update as necessary)
- Provide fair housing information to the City's Community Development Department to be disseminated to housing developers upon application for building and development-related permits
- Publicize the State's procedures regarding fair housing discrimination and develop and implement appropriate local procedures to assist individuals in filing complaints.
- The City will host an annual Housing Fair to provide information to the public on fair housing laws and regulations and programs that are available for housing assistance and funding. The Housing Fair would occur in low-to-moderate income areas in the City and would target protected classes.
- Work collaboratively with Bay Area Houston Habitat for Humanity and Southeast Texas Housing Finance Corporation to market their various programs.
- Work with local organizations to provide educational opportunities for local realtors and leasing agents on fair housing laws and regulations.
- Continue to evaluate the State's recommended actions to be undertaken to remove impediments.
- Present briefing concerning results of updated State AI and possible actions to be undertaken to remove impediments to City staff, City Council, and Fair Housing Advisory Committee to increase institutional knowledge.
- Present results of updated State AI and possible actions to be undertaken to remove impediments to public through public meetings or forums.
- The City will continue to designate April as Fair Housing Month and will encourage related agencies to do the same.

Impediment #2: The adoption by municipalities of zoning, development, and building regulations and processes that significantly increase the cost of construction and thus the median price of a home which ultimately prevents households from qualifying to buy a home.

Future Action: The City will continue its commitment to identifying and removing or reducing unnecessary barriers to fair housing to the extent feasible. Some of the steps that will be undertaken to address this impediment are:

- Require and ensure annual staff attendance at training session regarding current legal requirements and best practices for planning and creating fair housing opportunities for low-to-moderate income persons and protected classes.
- Review City building and development regulations to evaluate the existence of potential impediments to fair housing opportunities and the creation of communities of opportunities contained therein.
- Modify Connect CTY system and GroupBuilder software to be able to provide City notifications, including emergency and disaster notifications, to protected classes.
- Continue the work of the City's Fair Housing Advisory Committee.
- Utilize low-to-moderate income and protected class data when evaluating street and drainage infrastructure projects to be undertaken.
- Evaluate options for revising City website to provide expanded access for protected classes.
 - Continue to consider fair housing in related community planning activities.
 - Evaluate, on an annual basis, the location of route stops for its fixed route bus service by affordable housing developments and protected classes.
 - As appropriate, utilize special needs construction methods (i.e. curb cuts, sidewalks, hearing and visually impaired indicators at intersections, etc.) for public infrastructure projects and ensure compliance for private developers.
 - As an applicant for CDBG funds, utilize either the process that produced its current long-term plan or the FFAST form process for each application.

Impediment #3: A lack of adequate planning for redevelopment after emergency or disaster situations can create a situation of long-term displacement and substantial challenges for protected classes.

Future Action: The City will continue to prepare and plan for emergency and disaster situations so that protected classes that these situations do not adversely affect certain protected classes. Some steps that will be undertaken to address this impediment are:

- Support the State of Texas, TDHCA, and/or other agencies in their efforts to obtain a less restrictive interpretation of "duplication of benefits."

- In the event of an incident, and as appropriate, consider adopting a moratorium waiving zoning restrictions to allow temporary housing on an existing lot during the process of rebuilding or other appropriate regulatory waivers during a period after a disaster so that residents may move back to the City while waiting for redevelopment or rebuilding.
- As appropriate, work with Texas Department of Emergency Management and local emergency management officials to establish temporary housing plans to provide rapid deployment of temporary housing in disaster-affected areas in the future.

CITY OF DICKINSON, TEXAS
FHAST FORM – ACTION PLAN PROGRESS REPORT
As of April 7, 2016

Impediment #1: Protected classes may experience disparities in home mortgage lending and high cost loans.

No local action required at this time.

Impediment #2: There is inadequate information available to the real estate community, governments and the public about fair housing requirements and enforcement procedures.

No local action 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.

Action Plan:

3.1.A We will commit to undertake Fair Housing Month Activities including:

3.1.A.1 Passage of a resolution or proclamation by our governing body.

- The City Council has established April as Fair Housing Month.
- Completed in 2011, 2012, 2013, 2014, 2015 and planned for 2016.
- Documentation:
 - Proclamations from 2011, 2012, 2013, and 2015.

3.1.A.2 Activities in schools.

- The City of Dickinson has asked for clarification as to what the activities can be. The City will also need to work with the local school district to ensure the proposed activities are approved by the district administration. The City does distribute flyers related to its Housing Family Fair to all schools in the Dickinson Independent School District.
- The City will amend its FHAST form to reflect new completion date of activities.

3.1.A.3 Placing Posters in Public Buildings.

- Posters and a Fair Housing Information Sheet have been developed and printed. The Fair Housing Information Sheet has been placed in City Hall and the Dickinson Public Library. Fair Housing posters have been printed and are displayed in City Hall, the Dickinson Public Library, Dickinson Police Department, and the Central Fire Station in public areas.
- Completed in 2012 and 2013.
- Documentation:
 - Invoice for Fair Housing Posters
 - PDFs of Fair Housing Posters
 - Images of Fair Housing Posters in public areas
 - PDF of City's Fair Housing Information Sheet

3.1.A.4 Governing body will hold a special hearing to solicit input from the community.

- The City Council of the City of Dickinson has held public hearings in November 2011, 2012, and 2013 during the FFAST form approval and re-approval process.
- The Fair Housing Work Group meets at least twice a year to discuss Fair Housing related issues, the FFAST form implementation, and the City's Housing Family Fair.
- All meetings are open to the public.
- Completed in 2011, 2012 2013, 2014, and 2015.
- Documentation:
 - Minutes from relevant Fair Housing Work Group Meetings.
 - Minutes from relevant City Council meetings.

3.1.A.5. (1) Other: The City of Dickinson added a Fair Housing webpage to the City's website.

- The City created a Fair Housing web page in order to make more information related to housing rights available to residents.
- Completed in 2011. Reviewed and updated annually.
- Web page was updated and expanded in 2014, when the City's website was upgraded.
- Documentation:
 - A PDF of the City's Fair Housing webpage (2011-2014 version)
 - A PDF of the City's Fair Housing webpage (2014-2015 version)

3.1.A.5 (2) Other: Hold an annual Housing Family Fair.

- The City of Dickinson organizes and oversees a Housing Family Fair each year to provide information to residents about first-time homebuyer programs, issues of interest to new homeowners, and fair housing issues.
- Completed in 2011, 2012, 2013, 2014, 2015, and 2016.

- Documentation:
 - Flyers for the 2011, 2012, 2013, 2014, and 2015 Housing Family Fairs
 - Pictures from Housing Family Fair
 - Volunteer Sign in Sheet from 2014 Fair
 - Attendee/ Vendor List from 2013, 2014 and 2015 Fairs
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.

Action Plan:

3.2.A We will conduct/sponsor/fund fair housing activities at various times of the year other than “April as Fair Housing Month”.

The City of Dickinson currently holds an annual Housing Family Fair during February. The event was held in 2011, 2012, 2013, 2014, 2015, and 2016. As part of this event, the City conducts a Fair Housing Survey to ask attendees about their knowledge of the Fair Housing Act and to inquire as to what barriers to home ownership they have experienced.

- Completed 2011, 2012, 2013, 2014, 2015, 2016.
- Documentation:
 - *Please see documentation for action item 3.1.A.5*

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.
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:

Action Plan:

4.2.B We will develop an anti-NIMBYism action plan.

The City of Dickinson developed an anti-NIMBYism action plan to meet this objective. The plan was approved by resolution by the City Council.

- Completed in 2012.
- Documentation:
 - Resolution #1296-2012: Anti-NIMBYism Resolution.

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 maldistribution 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.

Action Plan:

5.1.A 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.

The City of Dickinson has reviewed its Street Prioritization Program and Comprehensive Drainage Study and has determined that both meet this objective. City officials have also met with Galveston County Water Control and Improvement District #1 (GCWCID#1) and requested that GCWCID#1 review its water and wastewater master 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.

- Completed in 2011.
- Review completed by:
 - Julie M. Robinson (Johnston), City Administrator
 - Kellis George, Public Works Director

5.1.C We have already collected information on the locations of protected populations and have adequate information for ensuring that new projects with “citywide benefits” will not perpetuate illegal differences in treatment.

The City of Dickinson maintains records on the location of protected populations based on information available from the U.S. Census.

- Completed in 2011 and ongoing.
- No additional documentation required.

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

Action Plan:

5.2.B We will review and ensure 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.

The City of Dickinson’s compliance with this objective is contingent upon the provision of guidelines by the State. No guidelines have been provided as of April 2015. The City of Dickinson reviewed its Round 2.2 projects to ensure that there was no “siloeing” or fair housing implications. This review was completed prior to the approval of the Round 2.2 contract.

- Completed in 2011.
- Review completed by:
 - Julie M. Robinson (Johnston), City Administrator
 - Kellis George, Public Works Director
- Documentation
 - Resolution #1228-2011 Authorizing the Submission of the CDBG-DR Round 2.2 Application

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.

Action Plan:

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

The City Council approved a Fair Housing Policies resolution that included the requirement that, to the greatest extent feasible, staff and elected officials receive Fair Housing training within the first 12 months of employment. Additionally, all current elected officials and staff attended a training session provided by J. Rice of Public Management, Inc.

- Completed in 2012 and 2013 and ongoing.

- Documentation:
 - Resolution #1295-2012 Approving Fair Housing Policies for the City of Dickinson
 - Minutes from training session
 - Attendee list at training session
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.

Action Plan:

5.5.C 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.

As explained in response to Impediment #5, Action Item 1, the City of Dickinson does not provide water or wastewater to its residents. These services are provided by Galveston County Water Control and Improvement District #1. The City has met with GCWCID#1 and requested that GCWCID#1 consider developing formal limits or official policies or procedures that take the residential location of members of protected classes into account with regard to the locations of undesirable water and wastewater infrastructure improvements.

- Completed in 2013.

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

Not applicable.

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.)

Action Plan:

- 5.7.B We have not consistently done this in the past and we plan to develop a process to consider making housing funding applications when funds for infrastructure are sought.

The City of Dickinson has participated in the HOME program in the past but has done so without having a formal process in place. Due to limited availability of HOME funds and the matching requirement, the City has elected not to apply for funds over the past few years. The City has been working with developers to meet requirements for a tax credit development and has submitted for the CDBG-DR multi-family housing allocations.

- The City's compliance with this objective is ongoing.

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.

Action Plan:

- 5.8.B We do not have such a requirement. We will develop one after receiving guidelines from the State.

The City of Dickinson has not received guidance from the State on this objective. However, the City passed a Fair Housing Policies resolution that stated that the City will ensure that any and all publicly accessible infrastructure projects undertaken and/or approved by the City are required to be compliant with the Americans with Disabilities Act (ADA), including both federally and non-federally funded projects.

- Completed in 2012.
- Documentation:
 - Resolution #1295-2012 Approving Fair Housing Policies for the City of Dickinson

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 (FHA-AST) 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.

Action Plan:

5.9.A We will submit a FFAST form.

The City of Dickinson completed the FFAST form using the process prescribed by the State. Each year, the City's Fair Housing Work Group convenes to review and update the City's FFAST form. The FFAST form is then forwarded to the City Council for final approval.

- Completed in 2011, 2012, 2013, 2014, 2015, and ongoing.
- No additional documentation required by the State.

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.

Action Plan:

5.10.A 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.

No additional action necessary.

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."

Not applicable. The City of Dickinson does not administer housing recovery funds.

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 and federal law.

Not applicable. The City of Dickinson is not entirely in a flood plain.

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.

Not applicable. The City of Dickinson does not administer housing recovery funds.

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.

Action Plan:

5.14.B We will cooperate with State agencies to carry out this step.

The City of Dickinson remains committed to working with State agencies throughout the CDBG-Disaster Recovery process, including working with TDHCA, GLO and their subcontractors. Any requests for demographic information have been addressed in a timely manner.

- No additional documentation required.

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.

Action Plan:

5.15.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 Julie M. Robinson (Johnston), City Administrator.

The City of Dickinson approved a Fair Housing Policies Resolution which included a statement that the City would ensure that all publicly accessible infrastructure projects would built to conform with the Americans with Disabilities Act (ADA) and address other discrimination issues such as accessibility.

- Completed in 2012.
- Documentation:
 - Resolution #1295-2012 Approving Fair Housing Policies for the City of Dickinson

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.

Not applicable. There were no family or elderly public housing units located within the City of Dickinson at the time of Hurricane Ike.

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.

Not applicable. The City of Dickinson does not have the resources to develop a testing program for Fair Housing violations. In the event that the State of Texas or some other governmental entity provides a testing program in which the City may participate, the City of Dickinson will consider participating therein.

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 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.

Action Plan:

6.3.A 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 by the State.

The City of Dickinson has included contact information on its website and on its Fair Housing posters located in public facilities so that residents know where to file Fair Housing complaints. Contact information has also been added to the City's Fair Housing informational handout (updated in 2014) which is available at the City Hall Complex. The handout includes a summary of the essential protections provided by the Fair Housing Act. A more complete list of Fair Housing rights is included on the City's Fair Housing webpage.

- Completed in 2011, 2012, 2013, 2014, 2015.
- Documentation:
 - PDF images of Fair Housing posters
 - Fair Housing Information Sheet
 - A PDF of the City's Fair Housing webpage (2011-2014 version)
 - A PDF of the City's Fair Housing webpage (2014-2015 version)

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.

Action Plan:

6.4.A We have published the contact information – at the local, state and federal levels – for reporting a fair housing complaint.

The City of Dickinson posted on its website the local, state, and federal contact information for places to file fair housing complaints.

- Completed in 2011, and revised in 2014.
- Documentation:
 - A PDF of the City's Fair Housing webpage (2011-2014 version)
 - A PDF of the City's Fair Housing webpage (2014-2015 version)

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.

Action Plan:

6.5.A.ii We will publish a policy statement consistent with the language the State provides in 2011.

The State has not provided the City of Dickinson with a policy statement regarding the jurisdiction's obligation to affirmatively further fair housing. However, the City of Dickinson has published its own statement on its website in the City's Long-Term Plan to Affirmatively Further Fair Housing expressing the City's commitment to affirmatively further fair housing. The City's website includes the following statement: *"The City of Dickinson actively seeks to promote fair housing in our community. We are taking steps to ensure our residents are aware of their rights and have access to information regarding fair housing laws and practices. The City has developed a Fair Housing Activity Statement (FHAAS Form) and a Revised Long-Term Plan for Affirmatively Furthering Fair Housing 2010-2015, which identifies impediments to fair housing in our community, reports past actions taken by the City to further fair housing, and describes current and future actions to be taken."*

- Completed in 2011, and revised in 2014.
- Documentation:
 - A PDF of the City's Fair Housing webpage (2011-2014 version)
 - A PDF of the City's Fair Housing webpage (2014-2015 version)
 - City of Dickinson's Long Term Plan to Affirmatively Further Fair Housing

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

The State has not provided guidance on the Fair Housing complaint process to the City of Dickinson. However, the City of Dickinson has discussed the complaint process with its grant administrator, Public Management, Inc., and is aware of the standard process through which complaints are managed. The City will consider adopting a formal complaint process if guidance is provided by the State. The City included a statement regarding the City's commitment, with guidance from the State, to develop a process and clear procedure for handling fair housing complaints in its Fair Housing Policies resolution. *Please note that, to date, the City of Dickinson has received, nor been made aware of, any fair housing complaints.*

- Completed in 2012.

- Documentation:
 - Resolution #1295-2012 Approving Fair Housing Policies for the City of Dickinson

6.5.C.ii We will begin keeping required logs and records based on guidance given by the State in 2011.

The City of Dickinson works with its grant administrator, Public Management, Inc., to ensure that all records and logs are kept up-to-date and are filed promptly with the State. The City included a statement that it would keep permanent logs and records of all fair housing inquiries, allegations, complaints and referrals in its Fair Housing Policies Resolution.

- Completed in 2012.
- Documentation:
 - Resolution #1295-2012 Approving Fair Housing Policies for the City of Dickinson

Impediment #7: Many local jurisdictions have zoning codes, land use controls and administrative practices that may impeded 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.

Action Plan:

7.1.A We recently conducted or updated a Fair Housing Review of our ordinances and codes.

The City's Community Development department reviewed the City's Code of Ordinances to see if any ordinance created a disparate impact. The City determined that the Code of Ordinances did not create a disparate impact.

- Completed in 2011.
- No additional documentation required.

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

The City of Dickinson included a statement that, to the greatest extent feasible, it will consider and document the fair housing implications of any

new codes or ordinances established in the City in its Fair Housing Policies resolution.

- Completed in 2012.
- Documentation:
 - Resolution #1295-2012 Approving Fair Housing Policies for the City of Dickinson

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.

Action Plan:

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

Currently, the City does not have a Comprehensive Plan, Land Use Plan, or other long-term planning documents, and the State has not provided guidelines for the City of Dickinson to complete a thorough Fair Housing Review outside of the City's standard review process. However, the City has encouraged mixed income development on its own. The City has actively recruited mixed income developments to the City, including working with developers to create a Revitalization Plan for the City. The City has also passed resolutions of support for a mixed income development and assisted with a developer's application to the Galveston County CDBG-DR multi-family housing program and the State's tax credit development program.

- This action is ongoing.
- Documentation:
 - City of Dickinson Revitalization Plan
 - Resolution #1369-2013 Approving the Revitalization Plan
 - Resolution #1370-2013 Supporting the Villages of Dickinson, LLC's application to the TDHCA Housing Tax Credit Program

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

The State has not provided guidelines to the City on regarding encouraging mixed-income affordable housing or other strategies to widen housing choice. However, as stated above, the lack of clear guidelines has not prevented the City from actively encouraging mixed-income affordable development.

- This action is ongoing.
- Documentation:

- Maps of racial concentrations
 - *Please see documentation for action item 7.2.A.ii*
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.

Not applicable. The City of Dickinson does not have the resources to offer incentives to developers to locate affordable housing projects in high opportunity neighborhoods and therefore cannot commit to offering “incentives”. However, to the extent possible, the City will offer expedited permitting and review processes for affordable housing projects within high opportunity target zones.

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.

Action Plan:

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

During Hurricane Ike, the City of Dickinson passed a moratorium on zoning restrictions to allow temporary housing on existing lots during the process of rebuilding so that residents could remain on their property while repairing or rebuilding their home. The City will consider passing another moratorium or waiver if another disaster occurs to ensure that residents are able to remain on their property.

- No additional documentation required.

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.

No action required by FFAST form.

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.

Action Plan:

9.2.A 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.

- No additional documentation required.

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

Action Plan:

9.3.A We agree to coordinate with the legislatively created Housing and Health Services Coordination Council for best practices on working with supportive services.

The City of Dickinson remains committed to cooperating with the Housing and Health Services Coordination Council for best practices on working with supportive services. At this time, no additional information has been provided to the City by the HHSCC.

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.

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.

Action Plan:

12.2.B 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.

The City of Dickinson developed a Section 3 program and submitted it to the GLO, per directions provided by GLO. Additionally, the City of Dickinson published notices of its Section 3 program in local newspapers and developed a Section 3 program webpage to provide additional information to residents and businesses seeking Section 3 certification.

- Completed in 2012.
- Copies of the Section 3 policy and Section 3 webpage are attached.

Impediment #13: Location and lack of housing accessibility and visitability standards within political jurisdictions limits fair housing choice for persons with disabilities.

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.

No action required by FFAST form.

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.

No action required by FFAST form.

3. TDHCA should require that all federally funded housing construction be built to accessibility standards found in Texas Government Code §2306.514.

Not applicable. Since the City of Dickinson is not administering any housing recovery funds, this action step does not apply for Dickinson. All housing recovery funds are being administered by Galveston County. Galveston County has accessibility standards that are applicable to federally funded housing construction. Any requirements for TDHCA/GLO would be the responsibility of TDHCA/GLO and not the City of Dickinson.

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.

Not Applicable. The City of Dickinson does not have a colonia.

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.

Action Plan:

16.1.A 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.

Records for the City of Dickinson are kept jointly by the City of Dickinson and the City’s grant administrator, Public Management, Inc.

- No additional documentation required.

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.

Action Plan:

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

The City of Dickinson continues to review and update our FFAST form annually or as needed.

- Completed in 2011, 2012, and 2013.
- No additional documentation required.

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.

16.3.A We plan to take additional Action Steps, described in Attachment.

The City of Dickinson has outlined additional actions in its Revised Long-Term Plan to Affirmatively Further Fair Housing (attached).

- Documentation:
 - Long-Term Plan to Affirmatively Further Fair Housing

ADJOURN

TIME: _____

MOTION: _____

SECOND: _____

VOTE _____