Bexar County Analysis of Impediments to Fair Housing Choice

Draft – May 2021
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ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

For Program Years 2021 to 2025

BEXAR COUNTY, TEXAS

Economic and Community Development Department
Community Development Division

Draft
May 2021

Prepared for the Bexar County by
Mosaic Community Planning, LLC
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CHAPTER 1
INTRODUCTION

Fair Housing Planning

Equal access to housing choice is crucial to America’s commitment to equality and opportunity for all. Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act, provides housing opportunity protection by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), specifically HUD’s Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD’s housing and community development programs. The AFFH requirements are derived from Section 808(e) (5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department’s housing and urban development programs in a manner to affirmatively further fair housing.¹

Local communities like Bexar County that receive grant funds from HUD through its entitlement process satisfy this obligation by performing an “Analysis of Impediments to Fair Housing Choice” (AI). In an AI, grantees evaluate barriers to fair housing choice and develop strategies and actions to overcome identified impediments based on their histories, circumstances, and experiences. Through this process, communities promote fair housing choice for all persons, including classes protected under the Fair Housing Act, and promote racially and ethnically inclusive patterns of housing occupancy, identify structural and systematic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

HUD presumes that a grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments, including:

- Analyzing and eliminating housing discrimination within the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;

• Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
• Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through its Community Planning and Development (CPD) programs, HUD’s goal is to expand mobility and widen a person’s freedom of choice. The Department also requires Community Development Block Grant (CDBG) program grantees to document AFFH actions in the annual performance reports that are submitted to HUD.

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlines procedures that jurisdictions and public housing authorities who participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule stipulated that grantees and housing authorities take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class characteristics. Under HUD’s final rule, grantees must take actions to:

• Address disparities in housing need;
• Replace segregated living patterns with integrated and balanced living patterns;
• Transform racially/ethnically concentrated areas of poverty into areas of opportunity; and
• Foster and maintain compliance with civil rights and fair housing laws.

To assist grantees affirmatively further fair housing, HUD provided publicly available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD’s final rule mandated that most grantees begin submitting to HUD an assessment developed using these tools in 2017; however, a 2018 HUD notice withdrew the requirement to prepare such assessments. A subsequent notice further required that grantees instead prepare and keep on file a current Analysis of Impediments to Fair Housing Choice. In 2020, HUD further relaxed requirements to complete an AI, allowing grantees to instead certify that they are affirmatively furthering fair housing.

Mosaic Community Planning assisted Bexar County with the preparation of this Analysis of Impediments to Fair Housing Planning Guide but also uses data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule. It covers unincorporated Bexar County and the County’s participating jurisdictions, including Alamo Heights, Balcones Heights, China Grove, Converse, Elmendorf, Grey Forest, Helotes, Hill Country, Kirby, Leon Valley, Live Oak, Schertz, Somerset, St. Hedwig, Universal City, and Von Ormy.

**Definitions**

**Affirmatively Further Fair Housing** – To Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has
the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.²

**Affordable** – Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners’ association fees.

**Fair Housing Choice** - In carrying out this Analysis of Impediments to Fair Housing Choice, Bexar County used the following definition of “Fair Housing Choice”:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

**Impediments to Fair Housing Choice** - As adapted from the HUD Fair Housing Planning Guide, impediments to fair housing choice are understood to include:³

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

**Protected Classes** – The following definition of federally protected classes is used in this document:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

**Data Sources**

**Decennial Census Data** – Data collected by the Decennial Census for 2010 and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

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• **2010 and 2000 Census Summary File 1 (SF 1)** - This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.

• **2000 Census Summary File 3 (SF 3)** - Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census, but many of the variables from SF 3 are included in the American Community Survey.

**American Community Survey (ACS)** - The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census’s SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

• **ACS Multi-Year Estimates** - More current than Census 2010 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 1-year estimates. The 2015-2019 ACS 5-year estimates are used most often in this assessment.

**HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)** - HUD’s AFFH Data and Mapping Tool provides a series of online, interactive maps and data tables to assist grantees in preparing fair housing analyses. Topics covered include demographics and demographic trends; racial and ethnic segregation; housing problems, affordability, and tenure; locations of subsidized housing and Housing Choice Voucher use; and access to educational, employment, and transportation opportunities. This report uses HUD’s latest data and maps. AFFHT0004, which was released in November 2017. HUD’s source data includes the American Community Survey (ACS), Decennial Census / Brown Longitudinal Tract Database (BLTD), Comprehensive Housing Affordability Strategy (CHAS), Longitudinal Employer-Household Dynamics (LEHD), HUD’s Inventory Management System (IMS) / Public and Indian Housing (PIH) Information Center (PIC), and others. For a complete list of data sources, please see HUD’s Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report or available online at: https://www.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-AFFHT0004-November-2017.pdf.
CHAPTER 2.
COMMUNITY PARTICIPATION

Community Engagement Overview

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in Bexar County. The County’s project team used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including community input sessions, stakeholder focus groups and interviews, and a community-wide survey.

Community Input Sessions

In February 2021 the County hosted a series of virtual community input sessions to understand local fair and affordable housing issues. All sessions were held via Zoom, and residents could join online or by phone. A total of 123 participants joined one of the community input sessions. Session dates and times are shown below:

Input Session 1 – Precinct 1
Tuesday, February 2, 2021
6:30 PM

Input Session 2 – Precinct 2
Thursday, February 4, 2021
6:30 PM

Input Session 3 – Precinct 3
Tuesday, February 9, 2021
6:30 PM

Input Session 4 – Precinct 4
Tuesday, February 11, 2021
6:30 PM

Stakeholder Focus Groups and Interviews

The planning team also engaged with stakeholders representing a variety of perspectives through virtual focus groups and individual interviews. Discussion topics included barriers to fair housing, housing discrimination, access to opportunity, and fair housing resources. A total of 114 community stakeholders participated in a focus group or interview, representing a range of viewpoints, including affordable housing, fair housing, real estate, community development, education, health services, public services, homelessness, housing and services for people with disabilities, other special needs housing, and others.

Focus group dates and times are shown below. All were held via Zoom:

Focus Group 1 – Affordable Housing
Tuesday, February 2, 2021
10:30 AM

Focus Group 2 – Homelessness
Thursday, February 4, 2021
10:30 AM
Focus Group 3 – Public Services
Tuesday, February 9, 2021
2:00 PM

Focus Group 4 – Fair Housing and Equity
Tuesday, February 11, 2021
10:30 AM

Focus Group 5 – City & County Staff
Wednesday, March 3, 2021
2:00 PM

Participating Organizations

One or more representatives from about 48 organizations participated in focus group, interview, or community input session. Organizations from which someone participated in development of this AI include:

- Beat AIDS
- Bexar County Commissioners Court
- Bexar County Emergency Service District 6
- BiblioTech
- Boys and Girls Club of San Antonio
- Celebrate Dyslexia
- Center for Health Care Services
- City of Balcones Heights
- City of Kirby
- City of Leon Valley
- City of Somerset
- City of Von Ormy
- Communities in Schools of San Antonio
- Each One Teach One
- Endevors
- Family Service Association
- Family Violence Prevention Services
- Greystone and Company
- Habitat for Humanity of San Antonio
- Haven for Hope
- HomeSpring Residential Services
- Housing Authority of Bexar County
- Juvenile Outreach and Vocational Education Network (JOVEN)
- Learning Independence Fosters Empowerment (LIFE) Program
- Louis Poppo Development & Consulting
- My City is My Home
- NAMI San Antonio
- Northeast Independent School District

- Parent/Child Incorporated
- Prospera Housing and Community Services
- Providence Place
- Roy Maas Youth Alternatives
- Salvation Army of San Antonio
- SAMMInistries
- San Antonio AIDS Foundation
- San Antonio Apartment Association (SAAA)
- San Antonio Board of Realtors (SABOR)
- San Antonio Food Bank
- Society of St. Vincent de Paul of Southwest Texas
- South Alamo Regional Alliance for the Homeless (SARAH)
- Southside Independent School District
- Texas House of Representatives, District 119
- Texas Low Income Housing Information Service
- Texas RioGrande Legal Aid (TRLA)
- Thrive Youth Center
- United Way of San Antonio and Bexar County
- Vesta Corporation
- Voices for Children of San Antonio
Community Survey

A final method for obtaining community input was a 21-question survey available to the public, including people living and/or working in Bexar County and other stakeholders. The survey was available from January through March 2021 via an online link. Hard copies were available by request to Bexar County Economic and Community Development Department. A total of 53 survey responses were received.

Publicity for Community Engagement Activities

Advertisement for the community input sessions and survey targeted the general public, as well as nonprofits, service providers, housing providers, and others working with low- and moderate-income households and special needs populations. Public notice of community input opportunities was given to residents through a bilingual public notice in the San Antonio Express-News, articles in the Express-News and on News 4 San Antonio, announcements on the County’s website and social media, and a project flyer. Flyers were emailed to more than 170 contacts representing a variety of viewpoints including elected officials and staff, housing authority staff, housing developers, nonprofit organizations, homeless housing and service providers, mental health service providers, organizations serving people with disabilities, family and senior services, workforce development organizations, and others. Meeting advertisements noted that accommodations (including translation, interpretation, or accessibility needs) were available if needed; no requests for accommodations were received.
Community Engagement Results

Results from community input sessions, stakeholder focus groups and interviews, and survey are summarized below. All comments and surveys were accepted. Public input is summarized in this section, with complete survey results provided as an appendix. Please note that comments below represent the community input received in the course of developing this plan, and do not necessarily reflect the views of Bexar County or Mosaic Community Planning.

Interview, Public Meeting, and Focus Group Results

1. What are Bexar County’s greatest affordable housing needs? Are there parts of the county where housing needs are greater than others?

- Affordable housing for persons on fixed incomes, such as SSI, or earning less than 60% AMI.
- Accessible, affordable housing, especially for persons with a criminal record, mental illness, or in recovery.
- Affordable housing for purchase, including for first time homebuyers.
- Affordable newly-constructed homes.
- Affordable rental housing, including for households earning less than 30% of median income.
- Rental assistance programs and marketing of rental assistance programs.
- More efficiency or one-bedroom apartments for people wanting to live alone.
- Housing near affordable transportation options, including transit, bike trails and sidewalks in all parts of the county.
- Transitional housing for homeless individuals, to include wraparound services.
- Permanent housing for people who are homeless and people experiencing mental illness and substance abuse.
- Demolition of substandard homes.
- Rehab/repair programs for low-income households.
- Larger incentives for affordable housing.
- Additional funds to create new housing choice vouchers.
- Senior housing.
- Assistance for seniors to make needed home repairs.
- Programs targeted to youth and senior homelessness.
- Trauma-informed design.
- Housing for persons with mental health needs near amenities.
- Housing for persons with mental health needs in safe, quiet areas.

2. What are Bexar County’s needs related to fair access to housing? Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices? Are you aware of any housing discrimination?

- Vouchers rates are too low and many landlords do not accept them.
- Criminal backgrounds, poor rental history, and credit requirements can be barriers to obtaining housing.
- Smaller families more easily exceed income eligibility limits.
• Landlords taking side in disputes based on race/ethnicity.
• Landlords do not want to work with victims of domestic violence.
• Lack of affordable housing.
• Transportation barriers.
• Lack of access to public transit and bike lanes.
• NIMBYism.
• Emotional support animals can be a barrier to obtaining housing.
• Amenities are more available in the north than in Precinct 1
• Lack of sewer in unincorporated Bexar.
• Evictions prevent residents from getting future housing.
• Double deposits and risk fees.
• Monthly rent increases.
• Discrimination due to race and disability status.

3. **What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?**

• Fair Housing Council of San Antonio was identified by several respondents.
• Several respondents also noted Texas RioGrande Legal Aid.
• Other agencies mentioned include in-house training through the San Antonio Apartment Association or private companies, the City of San Antonio Department of Human Services and My City is My Home.

4. **Thinking about public resources in Bexar County (e.g., parks, schools, roads, police and fire services, etc.) available evenly throughout all neighborhoods in the county?**

• There is a lot on the northside.
• We need accessible parks because obesity is an issue
• Kirby has deteriorated streets.
• In Precinct 4 there are no grocery stores like Nature’s Grocer, Sprouts or Whole Foods
• There are retail, healthcare and mental healthcare gaps in Precinct 4
• There is a lack of food access in Precinct 1
• Outside of the city, you have to drive 30 minutes to see a doctor.
CHAPTER 3.
SOCIOECONOMIC PROFILE

The Bexar County entitlement jurisdiction is home to an estimated 444,760 residents according to the 2015-2019 5-Year American Community Survey (ACS). Bexar County’s population accounts for 18.0% of residents in the San Antonio-New Braunfels Metropolitan Statistical Area (MSA) (2,468,193), which includes Atascosa, Bandera, Bexar, Comal, Guadalupe, Kendall, Medina, and Wilson counties. Bexar County’s population grew significantly between 2000 and 2010 (67.2%), although recent estimates show growth slowed in recent years (a 15.2% growth rate between 2010 and current estimates). The San Antonio-New Braunfels MSA expanded at a nearly identical rate (15.4%) since 2010, however, the region grew more slowly in the previous decade (25.4% between 2000 and 2010).

Demographic Profile

Race and Ethnicity

Hispanic or Latino residents comprise the largest racial or ethnic group in Bexar County representing almost half (46.6%) of the county’s total population. The county’s Hispanic population more than doubled between 2000 and 2010 and continued to expand at a rate of 22.5% to current figures. The Hispanic population surpassed the non-Hispanic white population to comprise the majority during the significant growth period between 2000 and 2010. The non-Hispanic white population currently makes up the second largest racial or ethnic group, accounting for 37.8% of the county’s population. The non-Hispanic white population experienced the slowest growth of any group since 2000.

Non-Hispanic Black residents, the third largest racial or ethnic group in Bexar County, comprise 9.3% of all county residents. The Black population has maintained a similar share of about one-tenth of the county’s population since 2000. Growth patterns of Black residents have been consistent with most other racial and ethnic groups with a significant increase in population between 2000 and 2010 followed by a more subdued expansion since 2010. Asian or Pacific Islander residents have also maintained a steady population share of around 3% over the years even after experiencing the fastest growth rate (123.3%) among all racial or ethnic groups between 2000 and 2010. The population size and share of mixed-race residents are nearly identical to the Asian population in the county. The Native American population is the only group to experience decline in the past two decades with a significant drop in numbers (-1447 residents) recorded since 2010.

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4 Demographic data throughout this report estimates the Bexar County HUD entitlement geography (“Bexar County”) as Bexar County outside of the city of San Antonio. Instances in which Bexar County data includes the city of San Antonio are noted.
At the regional level, Hispanic residents comprise a larger population share and the majority (55.4%) of the San Antonio-New Braunfels MSA population. Population shares of all other racial and ethnic groups are smaller in the MSA in comparison to each respective group in Bexar County. The difference in population shares of white residents between the county and the MSA is the largest among all racial and ethnic groups with white residents comprising approximately a third (33.7%) of the MSA’s population. Black residents comprise 6.3% of the MSA’s population, which is 3.0 percentage points smaller than the county’s Black population.

Demographic changes among all racial and ethnic groups in the San Antonio-New Braunfels MSA between 2000 and 2010 followed the general patterns growth and decline of racial and ethnic groups in Bexar County. Population growth in the MSA between 2000 and 2010 was overall less dramatic compared to the county, however, growth rates for most racial and ethnic groups in the MSA since 2010 are greater when compared to the same groups in Bexar County. Unlike the county, the growth rate of Asian or Pacific Islander MSA residents (107.8%) outpaced the growth rate of Hispanic MSA residents (58.4%) by a significant margin since 2000.

**National Origin**

The 2015-2019 5-Year ACS estimates Bexar County is home to 42,715 foreign-born residents. The foreign-born population experienced an increase of 161.3% since 2000 with most of the growth occurring between 2000 and 2010. The top countries of origin of the foreign-born population in Bexar County are Mexico, the Philippines, India, Germany, and Vietnam. The populations originating from Mexico is by far the largest group comprising 4.9% of the total population. Residents from the Philippines comprise the next largest group accounting for 0.7% of the population. Residents from India and Germany each comprise 0.3% of the total population while residents from Vietnam account for 0.2% of the county’s population.

In both Bexar County and the San Antonio-New Braunfels MSA, the most common country of origin for the foreign-born population is Mexico. The population share of Mexican residents in the MSA (7.3%) are larger in the MSA compared to the county. Although significantly less in size and share, residents from the Philippines and India comprise the next largest groups in both the county and the MSA. Bexar County residents from the Philippines account for a larger share of the population in the county compared to the MSA. The fourth and fifth largest foreign-born populations in the MSA are comprised of residents from Central American countries, Honduras and El Salvador.

**Limited English Proficiency (LEP)**

In Bexar County, about 7% of the population has limited English proficiency, compared to about 9.6% in the San Antonio-New Braunfels MSA. Contrary to the growth in share of foreign-born populations, LEP population shares declined between 2000 and 2010. Population dynamics for residents with limited English Proficiency (LEP) often resemble those of foreign-born residents in a community, however, some of the top LEP populations speak mostly Asian languages in the Bexar County and the San Antonio-New Braunfels MSA. The discrepancy in origin countries and languages spoken by top LEP population can be attributed to English proficiency in countries like India and Germany. The largest LEP population in both the county and the MSA speak Spanish and account for 85.2% and 90.0% of the LEP population, respectively. As a share of the
county’s total population, Spanish speakers make up about 7.2%. Other common languages spoken by LEP populations in the county include Korean, Chinese, Tagalog, and Arabic.

**Disability**

Residents with a disability comprise around 11.8% of the population in Bexar County and 13.8% in the San Antonio-New Braunfels MSA. The city and the MSA mostly share similar population shares by disability type. The most common disability type is difficulty with ambulatory movement, comprising around 6% and 7% of the population in both the county and the MSA, respectively. Disabilities that typically require more extensive assistance such as difficulties with independent living or self-care make up around 2% of the population in both the county and the MSA with one exception. The population share of residents in the MSA experiencing difficulty with independent living (4.5%) is nearly double the population share of the same group the county. Approximately 5% of the population in the county and MSA have a cognitive difficulty. Sensory disabilities such as hearing and vision difficulties impact around 3% of the population in the county and the MSA with slightly smaller share of residents with vision difficulty in the county (2.8%).

**Age**

The age distribution in Bexar County and the San Antonio-New Braunfels MSA are very similar and follow normal distribution patterns. The majority of the population, approximately 60%, are between the ages of 18 and 64 in both the county and the MSA. Around one-quarter of the county and the MSA population is under age 18 with the county having a slightly larger share compared to the MSA. The proportions of residents over the age of 65 are also similar between county (11.2%) and MSA (12.8%). The slight shifts in population share between 2000 and 2019 indicate an aging population in both the county and the MSA. The share of residents over the age of 65 grew from 8.6% to 11.1% of the county’s total population. The growth rate of this same age group was slower in the MSA expanding from 10.0% in 2000 to 12.8% in 2019.

**Sex**

Population shares of male and female residents are virtually even in both Bexar County and the San Antonio-New Braunfels MSA. Female residents make up the slight majority of the population in the county comprising 50.6% of the population. The difference in gender distribution of the MSA in comparison to the county is negligible between female (50.5%) and male populations (49.5%). There have not been significant fluctuations among these patterns over the past two decades.

**Family Type**

Recent estimates indicated that 41.4% of households in Bexar County have children. The share of households with children is slightly smaller (35.3%) in the MSA. In both the county and the MSA, the share of households with children declined significantly from more than half in 2000 to current levels. The share of married couples with no children is larger in the county (28.0%) compared to the MSA (25.8%). The most significant discrepancy in share size is found among married couples where 29.8% of married households in the county have children compared to just 22.6% in the MSA.
### Table 1: Demographic Overview

<table>
<thead>
<tr>
<th>Demographic Indicator</th>
<th>Bexar County</th>
<th></th>
<th></th>
<th>San Antonio-New Braunfels MSA</th>
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</tr>
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<tbody>
<tr>
<td></td>
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<td>%</td>
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<tr>
<td><strong>Race/Ethnicity</strong></td>
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<tr>
<td>Non-Hispanic or Latino</td>
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</tr>
<tr>
<td>White</td>
<td>168,236</td>
<td>37.8%</td>
<td>831,407</td>
<td>33.7%</td>
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<td></td>
</tr>
<tr>
<td>Black</td>
<td>41,559</td>
<td>9.3%</td>
<td>155,950</td>
<td>6.3%</td>
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<td></td>
</tr>
<tr>
<td>Asian or Pacific Islander</td>
<td>13,152</td>
<td>3.0%</td>
<td>60,895</td>
<td>2.5%</td>
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<td>Native American</td>
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<td>0.2%</td>
<td>3,895</td>
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<td>Other Race</td>
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<td>0.2%</td>
<td>3,801</td>
<td>0.2%</td>
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<td></td>
</tr>
<tr>
<td>Two or More Races</td>
<td>12,856</td>
<td>2.9%</td>
<td>45,227</td>
<td>1.8%</td>
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<td></td>
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<td>Hispanic or Latino</td>
<td>207,263</td>
<td>46.6%</td>
<td>1,367,018</td>
<td>55.4%</td>
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<td></td>
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<tr>
<td><strong>Total Population</strong></td>
<td><strong>444,760</strong></td>
<td><strong>100.0%</strong></td>
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<td><strong>2,468,193</strong></td>
<td><strong>100.0%</strong></td>
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<tr>
<td><strong>National Origin</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>#1 country of origin</td>
<td>Mexico</td>
<td>21,863</td>
<td>4.9%</td>
<td>Mexico</td>
<td>179,658</td>
<td>7.3%</td>
</tr>
<tr>
<td>#2 country of origin</td>
<td>Philippines</td>
<td>2,959</td>
<td>0.7%</td>
<td>India</td>
<td>10,653</td>
<td>0.4%</td>
</tr>
<tr>
<td>#3 country of origin</td>
<td>India</td>
<td>1,365</td>
<td>0.3%</td>
<td>Philippines</td>
<td>10,191</td>
<td>0.4%</td>
</tr>
<tr>
<td>#4 country of origin</td>
<td>Germany</td>
<td>113</td>
<td>0.3%</td>
<td>Honduras</td>
<td>5,412</td>
<td>0.2%</td>
</tr>
<tr>
<td>#5 country of origin</td>
<td>Vietnam</td>
<td>971</td>
<td>0.2%</td>
<td>El Salvador</td>
<td>5,021</td>
<td>0.2%</td>
</tr>
<tr>
<td><strong>Limited English Proficiency (LEP) Language</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>#1 LEP Language</td>
<td>Spanish or Spanish Creole</td>
<td>27,265</td>
<td>7.2%</td>
<td>Spanish or Spanish Creole</td>
<td>212,097</td>
<td>10.0%</td>
</tr>
<tr>
<td>#2 LEP Language</td>
<td>Korean</td>
<td>636</td>
<td>0.2%</td>
<td>Chinese</td>
<td>2,966</td>
<td>0.1%</td>
</tr>
<tr>
<td>#3 LEP Language</td>
<td>Chinese</td>
<td>505</td>
<td>0.1%</td>
<td>Vietnamese</td>
<td>2,861</td>
<td>0.1%</td>
</tr>
<tr>
<td>#4 LEP Language</td>
<td>Tagalog</td>
<td>446</td>
<td>0.1%</td>
<td>Arabic</td>
<td>2,202</td>
<td>0.1%</td>
</tr>
<tr>
<td>#5 LEP Language</td>
<td>Arabic</td>
<td>441</td>
<td>0.1%</td>
<td>Other Asian languages</td>
<td>2,124</td>
<td>0.1%</td>
</tr>
</tbody>
</table>
Table 1. Demographic Overview (continued)

<table>
<thead>
<tr>
<th>Demographic Indicator</th>
<th>Bexar County</th>
<th>San Antonio-New Braunfels MSA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td><strong>Age</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Under 18</td>
<td>502,367</td>
<td>25.7%</td>
</tr>
<tr>
<td>18-64</td>
<td>1,219,099</td>
<td>62.4%</td>
</tr>
<tr>
<td>65+</td>
<td>231,377</td>
<td>11.8%</td>
</tr>
<tr>
<td><strong>Disability Type</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hearing difficulty</td>
<td></td>
<td>3.6%</td>
</tr>
<tr>
<td>Vision difficulty</td>
<td>9,206</td>
<td>2.1%</td>
</tr>
<tr>
<td>Cognitive difficulty</td>
<td>24,404</td>
<td>5.5%</td>
</tr>
<tr>
<td>Ambulatory difficulty</td>
<td>26,187</td>
<td>5.9%</td>
</tr>
<tr>
<td>Self-care difficulty</td>
<td>9,598</td>
<td>2.2%</td>
</tr>
<tr>
<td>Independent living difficulty</td>
<td>8,960</td>
<td>2.0%</td>
</tr>
<tr>
<td><strong>Total Population with a disability</strong></td>
<td><strong>52,456</strong></td>
<td><strong>11.8%</strong></td>
</tr>
<tr>
<td><strong>Sex</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>219,583</td>
<td>49.4%</td>
</tr>
<tr>
<td>Female</td>
<td>225,177</td>
<td>50.6%</td>
</tr>
<tr>
<td><strong>Household Type</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Family Households</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Married Couple, Children</td>
<td>40,205</td>
<td>29.8%</td>
</tr>
<tr>
<td>Female Householder, Children</td>
<td>11,441</td>
<td>8.5%</td>
</tr>
<tr>
<td>Male Householder, Children</td>
<td>4,123</td>
<td>3.1%</td>
</tr>
<tr>
<td>Married Couple, No Children</td>
<td>37,807</td>
<td>28.0%</td>
</tr>
</tbody>
</table>
Table 1. Demographic Overview (continued)

<table>
<thead>
<tr>
<th>Demographic Indicator</th>
<th>Bexar County</th>
<th>San Antonio-New Braunfels MSA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Female Householder, No Children</td>
<td>5,267</td>
<td>3.9%</td>
</tr>
<tr>
<td>Male Householder, No Children</td>
<td>2,706</td>
<td>2.0%</td>
</tr>
<tr>
<td>Non-Family Households</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Female Householder</td>
<td>17,661</td>
<td>13.1%</td>
</tr>
<tr>
<td>Male Householder</td>
<td>15,635</td>
<td>11.6%</td>
</tr>
<tr>
<td>Total Households</td>
<td>134,845</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Note: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. The most populous places of birth and languages at the city and regional levels may not be the same and are thus labeled separately.

Data Sources: 2015-2019 5-Year American Community Survey, Tables B03002, B05006, B01001, B18101 to B18107, and B1005; 2011-2015 5-Year American Community Survey, Table B16001
### Table 2. Demographic Trends

<table>
<thead>
<tr>
<th>Demographic Indicator</th>
<th>2000</th>
<th>2010</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td><strong>Bexar County</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Race/Ethnicity</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>118,630</td>
<td>51.1%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>22,527</td>
<td>9.7%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>82,484</td>
<td>35.6%</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>5,665</td>
<td>2.4%</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>1,537</td>
<td>0.7%</td>
</tr>
<tr>
<td><strong>National Origin</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Foreign-born</td>
<td>16,350</td>
<td>7.1%</td>
</tr>
<tr>
<td><strong>Limited English Proficiency</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Limited English proficiency</td>
<td>17,840</td>
<td>7.7%</td>
</tr>
<tr>
<td><strong>Age</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Under 18</td>
<td>68,976</td>
<td>29.7%</td>
</tr>
<tr>
<td>18-64</td>
<td>143,037</td>
<td>61.6%</td>
</tr>
<tr>
<td>65+</td>
<td>20,055</td>
<td>8.6%</td>
</tr>
<tr>
<td><strong>Sex</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>116,271</td>
<td>50.1%</td>
</tr>
<tr>
<td>Female</td>
<td>115,797</td>
<td>49.9%</td>
</tr>
<tr>
<td><strong>Household Type</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Families with children</td>
<td>22,280</td>
<td>53.9%</td>
</tr>
<tr>
<td><strong>San Antonio-New Braunfels MSA</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Race/Ethnicity</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>696,175</td>
<td>40.7%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>107,819</td>
<td>6.3%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>863,027</td>
<td>50.4%</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>29,302</td>
<td>17%</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>8,999</td>
<td>0.5%</td>
</tr>
<tr>
<td><strong>National Origin</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Foreign-born</td>
<td>167,542</td>
<td>9.8%</td>
</tr>
<tr>
<td><strong>Limited English Proficiency</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Limited English proficiency</td>
<td>216,142</td>
<td>12.6%</td>
</tr>
</tbody>
</table>
Table 2. Demographic Trends (Continued)

<table>
<thead>
<tr>
<th>Demographic Indicator</th>
<th>2000</th>
<th>2010</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td><strong>San Antonio-New Braunfels MSA (continued)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Age</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Under 18</td>
<td>498,449</td>
<td>29.1%</td>
</tr>
<tr>
<td>18-64</td>
<td>1,028,647</td>
<td>60.1%</td>
</tr>
<tr>
<td>65+</td>
<td>184,606</td>
<td>10.8%</td>
</tr>
<tr>
<td><strong>Sex</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>833,128</td>
<td>48.7%</td>
</tr>
<tr>
<td>Female</td>
<td>878,573</td>
<td>51.3%</td>
</tr>
<tr>
<td><strong>Household Type</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Households with children</td>
<td>159,501</td>
<td>51.1%</td>
</tr>
</tbody>
</table>

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

**Data Sources:** U.S. Census 2000 SF1Tables P008, P012, P027 and P035, U.S. Census 2010 SF1Tables P5, P12, P29 and P39

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**Racially and Ethnically Concentrated Areas of Poverty**

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (RECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-White population of 50% or more. Using a metric that combines demographic and economic indicators helps to identify a jurisdiction’s most vulnerable communities.

The racial and ethnic composition of neighborhoods with concentrations of poverty is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Hispanic populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S. Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

Identification of RECAPs is significant in determining priority areas for reinvestment and services to ameliorate conditions that negatively impact RECAP residents and the larger region. Since 2000, the prevalence of concentrated poverty has expanded by nearly 75% in both population

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and number of neighborhoods. The majority of concentration of poverty is within the largest metro areas, but suburban regions have experienced the fastest growth rate.\textsuperscript{6}

Analysis of 2015-2019 5-Year American Community Survey data indicates that no census tracts in Bexar County meet HUD’s definition of a RECAP.

Figure 1 categorizes census tracts by percentage of population below poverty level and population distribution patterns by race and ethnicity throughout Bexar County. Census tracts with the highest percentage of residents below the poverty line are located in the southern regions of the city where spatial patterns show predominantly Hispanic or Latino residents. Conversely, census tracts with the lowest percentage of residents below the poverty line are located along the borders of the county where the racial and ethnic composition is more diverse. Aside from these loose patterns, there are clear indications of racial and ethnic segregation and spatial patterns to suggest white and Asian populations almost exclusively reside in low poverty census tracts.

Foreign-born populations in Bexar County are evenly distributed throughout the county. Residents from Mexico are the most widespread throughout the county and have a strong presence in census tracts with the highest poverty levels where there are virtually no other foreign-born populations present (see Figure 2). Spatial patterns also indicate concentrations of residents from the Philippines and China in low poverty census tracts in the north and west regions of the county.

Figure 1. Poverty Rates and Population by Race and Ethnicity in Bexar County, 2015-2019

Source: American Community Survey, 5-Year Estimates, 2015-2019

Percent of Population Below Poverty Level in the Past 12 Months

<table>
<thead>
<tr>
<th>Percent Range</th>
<th>Color</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 4%</td>
<td>Dark Grey</td>
</tr>
<tr>
<td>4% - 8%</td>
<td>Medium Grey</td>
</tr>
<tr>
<td>8% - 12%</td>
<td>Light Grey</td>
</tr>
<tr>
<td>12% - 16%</td>
<td>Grey</td>
</tr>
<tr>
<td>16% - 20%</td>
<td>Light Blue</td>
</tr>
<tr>
<td>20% - 28%</td>
<td>Blue</td>
</tr>
<tr>
<td>28% - 35%</td>
<td>Medium Blue</td>
</tr>
<tr>
<td>35% - 50%</td>
<td>Light Green</td>
</tr>
<tr>
<td>50% - 66%</td>
<td>Green</td>
</tr>
</tbody>
</table>

Race + Ethnicity
1 Dot = 100 People

- Hispanic or Latino (of any race)
- White, Non-Hispanic
- Black, Non-Hispanic
- Asian/ Pacific Islander, Non-Hispanic
- Multiple Races
- Native American, Non-Hispanic
- Other Race, Non-Hispanic
Figure 2. Poverty Rates and Population by National Origin in Bexar County, 2015-2019

Source: American Community Survey, 5-Year Estimates, 2015-2019

Percent of Population Below Poverty Level in the Past 12 Months

- Less than 4%
- 4% - 8%
- 8% - 12%
- 12% - 16%
- 16% - 20%
- 20% - 28%
- 28% - 35%
- 35% - 50%
- 50% - 66%

National Origin (Top 7 Most Populous)
1 Dot = 20 People

- Mexico
- India
- Philippines
- Honduras
- El Salvador
- Vietnam
- China (excl. Hong Kong and Taiwan)

Legend:
- Bexar County
- City of San Antonio
- San Antonio International Airport
- Government Canyon State Natural Area
- Joint Base Camp Bullis
CHAPTER 4. SEGREGATION AND INTEGRATION

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.\(^7\)

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed discriminatory housing practices but did little to address the existing segregation and inequalities. Other federal housing policies and programs, like Section 8 and HOPE VI, have been implemented in an effort to ameliorate the negative effects of residential segregation and reduce concentrations of poverty. Despite these efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on residential patterns today.

**Race and Ethnicity**

Figure 3 through Figure 5 map Bexar County’s population by race and ethnicity using 2000 and 2010 Census data and the 2015-2019 5-Year American Community Survey. Overall, population is distributed evenly throughout the county with some higher residential density areas located along the north, east, and west borders of San Antonio. Population distribution patterns by race and ethnicity throughout the county do not indicate residential segregation among any racial or ethnic groups in 2019 and 2010, however, there is some visual evidence of residential segregation of white populations in 2000. Spatial patterns show loose concentrations of white residents somewhat isolated in northern and eastern regions. Spatial patterns over time also suggest significant increases in overall population, but there is no visual evidence of a significant shifts in residential segregation from 2000 to 2019.

---

Figure 3. Population by Race and Ethnicity in Bexar County, 2015-2019

Source: American Community Survey, 5-Year Estimates, 2015-2019
Figure 4. Population by Race and Ethnicity in Bexar County, 2010

Source: Decennial Census, 2010

Bexar County
City of San Antonio
San Antonio International Airport
Government Canyon State Natural Area
Joint Base Camp Bullis

Race + Ethnicity
1 Dot = 100 People
- Hispanic or Latino (of any race)
- White, Non-Hispanic
- Black, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic
Figure 5. Population by Race and Ethnicity in Bexar County, 2000

Source: Decennial Census, 2000

<table>
<thead>
<tr>
<th>Bexar County</th>
<th>Race + Ethnicity</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of San Antonio</td>
<td>1 Dot = 100 People</td>
</tr>
<tr>
<td>San Antonio International Airport</td>
<td>Hispanic or Latino (of any race)</td>
</tr>
<tr>
<td>Government Canyon State Natural Area</td>
<td>White, Non-Hispanic</td>
</tr>
<tr>
<td>Joint Base Camp Bullis</td>
<td>Black, Non-Hispanic</td>
</tr>
<tr>
<td></td>
<td>Asian/ Pacific Islander, Non-Hispanic</td>
</tr>
<tr>
<td></td>
<td>Native American, Non-Hispanic</td>
</tr>
<tr>
<td></td>
<td>Other Race, Non-Hispanic</td>
</tr>
</tbody>
</table>
Segregation Levels

In addition to visualizing the racial and ethnic composition of the area with the preceding maps, this study also uses a statistical analysis – referred to as dissimilarity – to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to two groups living in a region are similarly geographically distributed. Segregation is lowest when the geographic patterns of each group are the same. For example, segregation between two groups in a city or county is minimized when the population distribution by census tract of the first group matches that of the second. Segregation is highest when no members of the two groups occupy a common census tract. The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups.

Evenness is not measured in an absolute sense but is scaled relative to the other group. Dissimilarity Index values range from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation. The DI represents the proportion of one group that would have to change their area of residence to match the distribution of the other.

The table below shares the dissimilarity indices for three pairings in Bexar County. This table presents values for 1990, 2000, and 2010, all calculated using census tracts as the area of measurement.

Table 3. Racial and Ethnic Dissimilarity Index Trends in Bexar County

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>1990</th>
<th>2000</th>
<th>2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>Black/White</td>
<td>42.8</td>
<td>44.8</td>
<td>39.9</td>
</tr>
<tr>
<td>Hispanic/White</td>
<td>33.3</td>
<td>36.8</td>
<td>34.5</td>
</tr>
<tr>
<td>Asian or Pacific Islander/White</td>
<td>32.2</td>
<td>29.7</td>
<td>24.7</td>
</tr>
</tbody>
</table>

Data Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0004, Released November 2017, https://egis.hud.gov/affht/

The Dissimilarity Indices calculated for each pairing in Bexar County show moderate levels of segregation between Black and White populations throughout the period between 1990 and 2010. DI values increased slightly from 42.8 in 1990 to 44.8 in 2000 before dropping just below the threshold for moderate segregation. Hispanic/White pairings show low segregation since 1990, however, levels of segregation increased slightly between 1990 and 2000 before decreasing in 2010. DI values for Asian or Pacific Islander/White have remained in the low segregation range and is the only pairing to decline in value consistently since 1990.
National Origin and Limited English Proficiency Population

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations recently.\(^8\) Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.\(^9\)

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (\(\approx 19\%\)) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.\(^{10}\) Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.\(^{11}\)

Communities of people sharing the same ethnicity and informal networks are able to provide some resources and opportunities, but numerous barriers and limited financial capital influence residential patterns of foreign-born and LEP populations.

The residential patterns of foreign-born populations in Bexar County are shown in Figure 6. Residents from Mexico clearly comprise the largest foreign-born population and are evenly distributed throughout the county. There are no spatial patterns to indicate strong concentrations of Mexican residents in specific geographic areas, however, there seems to be a larger presence in the southern region of the county. Residents originating from the Philippines reside in looser concentrations in the western region of the county with some small concentrations in densely population areas in the east.

Typically, the geographic distribution of residents with limited English proficiency (LEP) generally coincides with the locations of the foreign-born population. The Spanish-speaking population is the largest among the LEP population and closely mirror the even distribution patterns of Mexican residents throughout the county. All other LEP populations that speak Chinese, Vietnamese, Arabic, and Korean are sporadically located throughout the county with small clusters of Chinese-speaking residents living along the borders of the city of San Antonio.

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\(^8\) James, F., Romine, J., & Zwanzig, P. (\(\approx 1998\)). The Effects of Immigration on Urban Communities. Cityscape, 3(3), 171-192.


Figure 6. Foreign-Born Population by Nationality in Bexar County, 2015-2019

Source: American Community Survey, 5-Year Estimates, 2015-2019

National Origin of Foreign-Born Population
(Top 7 Most Populous)
1 Dot = 20 People
- Mexico
- India
- Philippines
- Honduras
- El Salvador
- Vietnam
- China (excl. Hong Kong and Taiwan)
Figure 7. Population with Limited English Proficiency in Bexar County, 2015-2019


LEP Population by Language Spoken*
(Top 5 Most Populous)

1 Dot = 25 People

- Spanish or Spanish Creole
- Chinese
- Vietnamese
- Arabic
- Korean

*For population 5 years and over
CHAPTER 5. ACCESS TO OPPORTUNITY

Where people live shapes prospects for economic mobility and access to resources and services such as high-quality education; affordable transportation; a healthy environment; fresh, affordable food; and healthcare. However, neighborhood or housing choices are often limited by discrimination in housing markets or public policies that result in concentrated poverty, disinvestment, and a lack of affordable housing in neighborhoods with access to high-performing schools and jobs that pay living wages. In this way, limited housing choices reduce access to opportunity for many protected classes.

In addition to proximity, access to opportunity is also shaped by economic, social, and cultural factors. For example, residents may live in locations with high numbers of jobs but may be unable to obtain them due to gaps in education or skills, a lack of reliable transportation, or childcare needs.

The strategy to improve access to opportunity through housing and community development programs has been two-pronged. Programs such as tenant-based housing vouchers provide recipients with mobility to locate in lower-poverty areas, while programs such as the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in low- or moderate-income neighborhoods. The following sections access to opportunity in Bexar County, including employment and workforce development, education, transportation, environmental quality, fresh food, and healthcare.

Employment and Workforce Development

Neighborhoods with high numbers of jobs nearby are often assumed to have good access to those jobs. However, other factors—transportation options, the types of jobs available in the area, or the education and training necessary to obtain them—may also shape residents’ access to available jobs. For example, residents of a neighborhood in close proximity to a high number of living-wage jobs may not have the skills or education required for those jobs, and thus may continue to experience high levels of unemployment, work in low-wage positions, or need to commute long distances to access employment. This section analyzes indicators of both labor market engagement and jobs proximity, which, when considered together, offer a better indication of how accessible jobs are for residents.

Labor Market Engagement

Educational attainment, labor force participation, and unemployment are indicators of residents’ engagement with the labor market. In Bexar County (excluding the city of San Antonio), 35.1% of residents aged 25 and over hold a bachelor’s degree or higher, according to American Community Survey 5-Year Estimates for 2015-2019. Geographic disparities exist, as the
percentage of residents with bachelor’s degrees or higher ranges from 4.3% to 76.4% across the county’s census tracts. Residents in central and north Bexar County tend to have the highest levels of educational attainment, while educational attainment tends to be lowest in south and east Bexar County (see Figure 9).

Disparities in educational attainment also exist by race and ethnicity in the county. Asian or Pacific Islander residents and residents of two or more races tend to have higher levels of educational attainment (48.0% and 39.8% have a bachelor’s degree or higher, respectively), while residents of some other race alone, Native American residents, and Hispanic or Latino residents are least likely to have higher levels of education (16.2%, 23.3%, and 23.9% have a bachelor’s degree or higher, respectively (see Figure 8).

Figure 8. Educational Attainment by Race/Ethnicity in Bexar County

Stakeholder Comment:
“We need additional facilities with after school tutoring, adult literacy programs, and job training. Many people holding down jobs for their family are illiterate. It has a big impact on families.”
Figure 9. Educational Attainment and Race/Ethnicity in Bexar County

Source: American Community Survey, 5-Year Estimates, 2015-2019
An estimated 66.6% of the population aged 16 and over in Bexar County (outside of the city of San Antonio) participates in the labor force (ACS 5-Year Estimates, 2015-2019). As with educational attainment, geographic disparities exist, with labor force participation rates ranging from 47.2% to 91.3% in census tracts across the county. Residents of south and parts of central Bexar County tend to participate in the labor force at the lowest levels, while participation tends to be highest in west Bexar County (see Figure 11).

While labor force participation is fairly consistent across racial and ethnic groups, it is highest among Black or African American residents (71.2% of whom participate in the labor force) and lowest among Native American residents (64.1% of whom participate, see Figure 10).

**Figure 10. Labor Force Participation by Race/Ethnicity**
Figure 11. Labor Force Participation and Race/Ethnicity in Bexar County
An estimated 4.6% of Bexar County residents (excluding residents of the city of San Antonio) were unemployed as of the 2015-2019 ACS five-year estimates. More recent data from the Texas Workforce Commission shows the unemployment rate at 7.1% as of January 2021. As with educational attainment and labor force participation, unemployment varies across the county’s census tracts, ranging from 0% in one tract in north Bexar County to 18.5% in a tract in east Bexar County (see Figure 13). Twelve census tracts in central, south, and east Bexar County have unemployment rates above 8%.

Figure 12. Unemployment by Race/Ethnicity
Figure 13. Unemployment Rate and Race/Ethnicity in Bexar County

Source: American Community Survey, 5-Year Estimates, 2015-2019

Unemployment Rate, Population Aged 16+
- 0% - 2%
- 2% - 3%
- 3% - 4%
- 4% - 5%
- 5% - 6%
- 6% - 8%
- 8% - 10%
- 10% - 15%
- 15% - 23%

Race + Ethnicity
1 Dot = 100 People
- Hispanic or Latino (of any race)
- White, Non-Hispanic
- Black, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Multiple Races
- Native American, Non-Hispanic
- Other Race, Non-Hispanic
Household income is another indicator of access to employment and jobs that pay living wages. Median household incomes are lowest in parts of central and south Bexar County, where they fall below $40,000 in seven census tracts. Median incomes tend to be highest in north and parts of central Bexar County, topping $120,000 in 14 census tracts (see Figure 14).

Low median household incomes in many of the city’s census tracts highlight the fact that a high proportion of households do not have sufficient incomes to afford basic needs. Costs for a family of two working adults and one child in Albany, including housing, childcare, healthcare, food, transportation, taxes, and other miscellaneous costs, are estimated at $5,293.50 per month (or $63,522 annually). Yet, 26.3% of primary jobs held by Albany residents pay $1250 per month or less ($15,000 or less per year), and 45.6% of primary jobs pay between $1251 and $3,333 (between $15,000 and $39,996 per year).

Jobs Proximity

Jobs in the county tend to be clustered in north-central Bexar County, including in the city of San Antonio and in and around several suburban municipalities in central Bexar County – Leon Valley, Windcrest, Shavano Park, Terrell Hills, Alamo Heights, and Balcones Heights. Fewer jobs exist in some of the inner-ring suburbs in east, west, and south Bexar County (see Figure 15).

Residents and stakeholders who participated in this planning process noted that the lack of public transportation in the county is often a barrier to accessing employment for residents who do not have vehicles.

Longitudinal Employer-Household Dynamics data also indicates that a substantial share of workers living in Bexar County work outside of the county. Specifically, an estimated 777,168 employed residents live in Bexar County (including the city of San Antonio). These include 194,415 residents (25.0%) who both live and work in Bexar County (outside of the city of San Antonio), 403,129 residents who both live and work in the city of San Antonio (51.9%), and 179,624 residents who live in Bexar County (including in the city of San Antonio) but work outside of the county (23.1%) (see Table 4). The high levels of commuting across jurisdictions demonstrates that lack of access to vehicles and low levels of public transportation access may be barriers for residents in accessing employment.

Table 4. Inflow and Outflow of Workers (Primary Jobs), Bexar County, 2018

<table>
<thead>
<tr>
<th>Inflow and Outflow of Workers</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Living in Bexar County (including the city of San Antonio)</td>
<td>777,168</td>
<td>100.0%</td>
</tr>
<tr>
<td>Living in Bexar County but Employed Outside of the County</td>
<td>179,624</td>
<td>23.1%</td>
</tr>
<tr>
<td>Living and Employed in Bexar County (outside of the city of San Antonio)</td>
<td>194,415</td>
<td>25.0%</td>
</tr>
<tr>
<td>Living and Employed in the city of San Antonio</td>
<td>403,129</td>
<td>51.9%</td>
</tr>
<tr>
<td>Employed in Bexar County (including the city of San Antonio)</td>
<td>811,481</td>
<td>100.0%</td>
</tr>
<tr>
<td>Employed in Bexar County but Living Outside of the County</td>
<td>213,937</td>
<td>26.4%</td>
</tr>
<tr>
<td>Employed and Living in Bexar County (outside of the city of San Antonio)</td>
<td>194,415</td>
<td>24.0%</td>
</tr>
<tr>
<td>Employed and Living in the city of San Antonio</td>
<td>403,129</td>
<td>49.7%</td>
</tr>
</tbody>
</table>

Source: Longitudinal Employer-Household Dynamics (LODES) data, 2018
Figure 14. Median Household Income and Race/Ethnicity in Bexar County

Source: American Community Survey, 5-Year Estimates, 2015-2019

### Median Household Income
- $10,000 - $20,000
- $20,000 - $30,000
- $30,000 - $40,000
- $40,000 - $50,000
- $50,000 - $65,000
- $65,000 - $80,000
- $80,000 - $100,000
- $100,000 - $125,000
- $125,000 - $216,000

### Race + Ethnicity
- 1 Dot = 100 People
- Hispanic or Latino (of any race)
- White, Non-Hispanic
- Black, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Multiple Races
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

Legend:
- Bexar County
- City of San Antonio
- San Antonio International Airport
- Government Canyon State Natural Area
- Joint Base Camp Bullis
Figure 15. Job Proximity and Race/Ethnicity in Bexar County

Source: American Community Survey, 5-Year Estimates, 2015-2019
Education

School proficiency is an indication of the quality of education that is available to residents of an area. High-quality education is a vital community resource that can lead to more opportunities--such as employment and increased earnings--and improve quality of life. Public schools in Bexar County fall within 19 independent school districts (ISDs) (see Figure 16,12 including:

- Alamo Heights ISD
- Boerne ISD
- Comal ISD
- East Central ISD
- Edgewood ISD
- Fort Sam Houston ISD
- Harlandale ISD
- Judson ISD
- Lackland ISD
- Medina Valley ISD
- North East ISD
- Northside ISD
- Randolph Field ISD
- San Antonio ISD
- Schertz-Cibolo-Universal City ISD
- Somerset ISD
- South San Antonio ISD
- Southside ISD, and
- Southwest ISD.

Figure 16. School Districts in Bexar County

Source: North East ISD

School performance varies by district, and districts in the county vary significantly in their demographics, including students’ race and household income (see Table 5). School district ratings range from 77 (a rating of C) in the East Central and South San Antonio districts to 97 (a rating of A) in the Randolph Field ISD in northeast Bexar County.

While an estimated 63.1% of students are economically disadvantaged in the county overall, shares of disadvantaged students vary widely among school districts, ranging from 7.4% in the Randolph Field ISD to 94.7% in the Edgewood ISD in central Bexar County. The percentage of students who are white—an indicator of racial segregation among school districts—ranges from 0.6% in the Edgewood ISD to 63.8% in the Boerne ISD in northwest Bexar County. Notably, school districts with the largest shares of economically disadvantaged students tend to receive lower district ratings, indicating disparities in school district performance by socioeconomic status. These districts tend to also have lower proportions of white students, indicating high levels of segregation by district and disparities in access to the highest performing schools by race and ethnicity.

Stakeholder Comment:

“Fortunately, we have the BiblioTech. Many people don’t have devices or internet access outside of school. When COVID hit, a lot of kids were challenged to do remote learning.”

Stakeholder Comment:

“Impacts of the pandemic will create a huge education gap. Projections for prisons are based on 3rd grade test scores. We need to look at unincorporated, impoverished areas and provide resources to help kids catch up.”

Table 5. Demographics and School Performance by District

<table>
<thead>
<tr>
<th>District</th>
<th>Number of Students</th>
<th>Percent White Students</th>
<th>Percent Economically Disadvantaged</th>
<th>Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alamo Heights ISD</td>
<td>4,843</td>
<td>52.6%</td>
<td>19.7%</td>
<td>91 (A)</td>
</tr>
<tr>
<td>Boerne ISD</td>
<td>9,133</td>
<td>63.8%</td>
<td>18.3%</td>
<td>94 (A)</td>
</tr>
<tr>
<td>Comal ISD</td>
<td>23,859</td>
<td>53.3%</td>
<td>29.7%</td>
<td>92 (A)</td>
</tr>
<tr>
<td>East Central ISD</td>
<td>10,029</td>
<td>15.2%</td>
<td>67.9%</td>
<td>77 (C)</td>
</tr>
<tr>
<td>Edgewood ISD</td>
<td>10,166</td>
<td>0.6%</td>
<td>94.7%</td>
<td>78 (C)</td>
</tr>
<tr>
<td>Fort Sam Houston ISD</td>
<td>1586</td>
<td>39.6%</td>
<td>27.1%</td>
<td>95 (A)</td>
</tr>
<tr>
<td>Harlandale ISD</td>
<td>14,073</td>
<td>15%</td>
<td>88.0%</td>
<td>86 (B)</td>
</tr>
<tr>
<td>Judson ISD</td>
<td>22,848</td>
<td>14.8%</td>
<td>67.5%</td>
<td>83 (B)</td>
</tr>
</tbody>
</table>

Table 5. Demographics and School Performance by District (continued)

<table>
<thead>
<tr>
<th>District</th>
<th>Number of Students</th>
<th>Percent White Students</th>
<th>Percent Economically Disadvantaged</th>
<th>Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lackland ISD</td>
<td>1072</td>
<td>44.8%</td>
<td>13.3%</td>
<td>92 (A)</td>
</tr>
<tr>
<td>Medina Valley ISD</td>
<td>5,424</td>
<td>31.2%</td>
<td>51.2%</td>
<td>93 (A)</td>
</tr>
<tr>
<td>North East ISD</td>
<td>64,850</td>
<td>25.2%</td>
<td>48.4%</td>
<td>89 (B)</td>
</tr>
<tr>
<td>Northside ISD</td>
<td>15,797</td>
<td>13.8%</td>
<td>49.5%</td>
<td>87 (B)</td>
</tr>
<tr>
<td>Randolph Field ISD</td>
<td>1467</td>
<td>415%</td>
<td>7.4%</td>
<td>97 (A)</td>
</tr>
<tr>
<td>San Antonio ISD</td>
<td>48,720</td>
<td>2.4%</td>
<td>90.4%</td>
<td>83 (B)</td>
</tr>
<tr>
<td>Schertz-Cibolo-University City ISD</td>
<td>15,768</td>
<td>37.2%</td>
<td>29.9%</td>
<td>89 (B)</td>
</tr>
<tr>
<td>Somerset ISD</td>
<td>4,156</td>
<td>13.3%</td>
<td>83.5%</td>
<td>87 (B)</td>
</tr>
<tr>
<td>South San Antonio ISD</td>
<td>8,934</td>
<td>14%</td>
<td>90.9%</td>
<td>77 (C)</td>
</tr>
<tr>
<td>Southside ISD</td>
<td>5,660</td>
<td>6.3%</td>
<td>82.3%</td>
<td>78 (C)</td>
</tr>
<tr>
<td>Southwest ISD</td>
<td>13,733</td>
<td>5.2%</td>
<td>85.1%</td>
<td>82 (B)</td>
</tr>
</tbody>
</table>

Source: Texas Education Agency (2019)

Transportation

Affordable, accessible transportation makes it easier for residents to access a range of opportunities, providing connections to employment, education, fresh food, healthcare, and other services. Low-cost public transit can facilitate access to these resources, while a lack to access to affordable transportation poses barriers to meeting key needs, particularly in areas with low levels of walkability and a lack of access to vehicles.

Access to Affordable Transportation

In Bexar County, VIA Metropolitan Transit provides bus service in the city of San Antonio and several of the county’s suburban municipalities. VIA’s bus routes serve Alamo Heights, Balcones Heights, Castle Hills, China Grove, Converse, Kirby, Leon Valley, Olmos Park, Terrell Hills, and Shavano Park (see Figure 10), but are not available in Fair Oaks Ranch, Helotes, Hill Country Village, Hollywood Park, Live Oak, Selma, Schertz, and Universal City. In addition to bus services, VIA offers on-demand transit in the Northeast San Antonio area; paratransit services for residents with disabilities, which can be scheduled at least one day in advance; and vanpool services for employees of participating workplaces.

Estimates of transportation spending as a percentage of household income are high throughout most of the region’s census tracts. Figure 18 estimates transportation expenses for a three-person single-parent family with income at 50% of the regional median income for renters. Estimates of transportation spending as a percentage of household income for this family range from 25.7% to 47.0% in census tracts in Bexar County (excluding the city of San Antonio).
Residents of municipalities in central Bexar County, which have the greatest access to the VIA transit system, tend to have the lowest transportation costs relative to income. Transportation costs tend to make up a greater share of income in other areas of the county, which have lower levels of access to transit. In areas outside of central Bexar County, the combination of a lower proximity to jobs and higher proportions of residents' incomes spent on transportation may present barriers to obtaining and maintaining employment.

Stakeholder Comment:

“There is a great need for affordable housing with connectivity to jobs. Some residents would like to live near support networks outside of San Antonio, but don’t because of limited public transportation. Areas like Randolph, Converse, and Universal City are not as affordable and lack public transportation.”
Figure 18. Low-Cost Transportation Access and Race/Ethnicity in Bexar County

Transportation Costs as Percent of Household Income

<table>
<thead>
<tr>
<th>Low-Income Renter Households*</th>
<th>Race + Ethnicity</th>
</tr>
</thead>
<tbody>
<tr>
<td>23% - 25%</td>
<td>Hispanic or Latino (of any race)</td>
</tr>
<tr>
<td>25% - 28%</td>
<td>White, Non-Hispanic</td>
</tr>
<tr>
<td>28% - 30%</td>
<td>Black, Non-Hispanic</td>
</tr>
<tr>
<td>30% - 33%</td>
<td>Asian/Pacific Islander, Non-Hispanic</td>
</tr>
<tr>
<td>33% - 35%</td>
<td>Multiple Races</td>
</tr>
<tr>
<td>35% - 38%</td>
<td>Native American, Non-Hispanic</td>
</tr>
<tr>
<td>38% - 40%</td>
<td>Other Race, Non-Hispanic</td>
</tr>
<tr>
<td>40% - 43%</td>
<td></td>
</tr>
<tr>
<td>43% - 47%</td>
<td></td>
</tr>
</tbody>
</table>

* Based on estimates for a 3-person single-parent family with income at 50% of the median income for renters in the region
Vehicle Access

Access to vehicles also shapes residents’ ability to connect to employment and education opportunities, resources, and services, particularly in areas with limited access to public transit. An estimated 2.9% of households in Bexar County (excluding the city of San Antonio) do not have access to a vehicle, according to 2015-2019 5-Year American Community Survey. While vehicle access is high overall, disparities exist by geography and reflect access to public transit in the county. Residents of Leon Valley, Balcones Heights, and other parts of central Bexar County, areas with the greatest access to public transit, tend to own vehicles at the lowest rates: in five census tracts, between 17% and 28% of households do not have a vehicle. In several tracts in south, east, and central Bexar County, 5% to 13% of residents do not have vehicles. In contrast, in most other areas of the county, almost all households have access to vehicles, reflecting a need for vehicle ownership in areas with less access to public transit (see...
Stakeholders who participated in this planning process emphasized that a lack of access to vehicles is often a barrier to employment for residents living in areas with low proximity to jobs and without access to public transportation. A lack of access to vehicles also creates barriers to accessing needed services in areas in which those services are not located within walking distance and transit access is limited. In this way, residents without access to vehicles often find their housing choices limited to locations where public transportation is available. The combination of high levels of vehicle ownership and high transportation costs as a percentage of household income in areas that are not well served by public transit reflects a need for transportation options that reduce household transportation costs in these areas.

As would be expected, areas with lower levels of vehicle access tend to have higher proportions of residents who take public transportation, walk, bike, or take taxis to work (see Figure 13). In 10 census tracts in central Bexar County and around Lackland and Randolph Air Force bases, between 10% and 60% of residents use these forms of transportation, the highest proportions in the county (excluding the city of San Antonio). In 18 additional tracts in central and south Bexar County, 5% to 10% of residents use these forms of transportation, while in the remainder of the county, fewer than 5% of residents use these forms of transportation.
Figure 19. Vehicle Access and Race/Ethnicity in Bexar County

Source: American Community Survey; 5-Year Estimates, 2015-2019
Figure 20. Means of Transportation to Work and Race/Ethnicity in Bexar County

Source: American Community Survey, 5-Year Estimates, 2015-2019

Percent of Workers Aged 16+ Who Take Public Transportation, Walk, Bike, or Taxi to Work

Race + Ethnicity
1 Dot = 100 People
- Hispanic or Latino (of any race)
- White, Non-Hispanic
- Black, Non-Hispanic
- Asian/ Pacific Islander, Non-Hispanic
- Multiple Races
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

Bexar County
City of San Antonio
Government Canyon State Natural Area
San Antonio International Airport
Joint Base Camp Bullis
Walkability

Along with access to transit, low-cost transportation, and vehicles, walkability shapes the extent to which residents are able to access employment, resources, and services. While the region is generally car-dependent, parts of central San Antonio have high walkability, and some of the central suburban municipalities have moderate walkability (shown in green and yellow, respectively in Figure 21). Residents and stakeholders emphasized that many areas of the region lack accessible sidewalks or lighting, making accessing resources and services via walking more difficult and less safe, particularly for residents with disabilities. In this way, low levels of transit and vehicle access may pose a more significant barrier to accessing jobs and services for residents living in areas with low levels of walkability. Overall low levels of walkability in the county combined with low levels of access to low-cost transportation point to challenges for residents without access to vehicles in connecting to employment, resources, and services.

Figure 21 Walkability in Bexar County

Stakeholder Comment:

"Multimodal transportation is huge. VIA looks at increasing routes and improving efficiency, but if people get off the bus with no place to walk and no lights, it makes it hard. When we replace streets, we need to look at sidewalks and lighting so people will feel comfortable making the trip from the bus."
Environmental Quality

Environmental quality and access to environmental amenities also shape the opportunities available to residents. Access to parks and other green infrastructure in counties, cities, and neighborhoods provides a range of environmental, social, and health benefits, including access to nature and recreation opportunities; cleaner air and water; alternative transportation options; improvements in physical and mental health and wellbeing; and opportunities for food production and other local economic development. At the same time, environmental hazards, such as poor air quality and toxic facilities, are associated with negative health effects including increased respiratory symptoms, hospitalization for heart or lung diseases, cancer and other serious health effects, and even premature death. Certain population groups, such as children, have a greater risk of adverse effects from exposure to pollution.\footnote{U.S. Environmental Protection Agency. (n.d.). Managing Air Quality - Human Health, Environmental and Economic Assessments. Retrieved from: https://www.epa.gov/air-quality-management-process/managing-air-quality-human-health-environmental-and-economic}

Access to Parks

In Bexar County, parks are most accessible within the city of San Antonio and parts of the northern portion of the county. In contrast, few parks exist in most of south, southeast, and southwest Bexar County outside of the city of San Antonio (see Figure 22).

Figure 22. Parks Access in Bexar County
Hispanic residents comprise most of the population in these less densely populated areas of the county (see Figure 23).
Figure 23. Park Access and Race/Ethnicity in Bexar County

Source: Trust for Public Land ParkScore (2020)
Stakeholders emphasized a high level of need for parks and recreation facilities and improvements, noting that significant variation exists between lower- and upper-income areas regarding the quality of parks, available amenities, and maintenance. About 33% of survey respondents noted that parks and trails are equally provided in their communities, while about 56% said that they are not equally available. 54.9% of survey respondents noted that parks, gyms, and recreation facilities are high-level needs, the largest share of all community facility and building needs in the survey. A high level of need for community centers was noted by 49.0% of survey respondents, and improvements to existing facilities—including ADA accessibility improvements—were noted as a high need by 43.1% of survey respondents.

In addition to investment in parks and recreation facilities, survey respondents indicated a high level of need for investments in general neighborhood revitalization. 46.8% of respondents rated ‘neighborhoods that need revitalization and new investment’ as a barrier to fair housing in the county, making it the seventh most commonly identified barrier, following barriers focused on a lack of affordable housing, a lack of housing options and resources for people with disabilities, and discrimination by landlords or rental agents. In combination with the identification of community parks, gyms, and facilities need, the noted need for neighborhood revitalization and reinvestment indicates that access to parks should be a priority as the county considers opportunities for neighborhood reinvestment.

**Stakeholder Comment:**

"Keep focusing on anything that will improve mental health, such as beautiful parks and recreation centers. More neighborhood parks that offer after school or summer programs in high-poverty areas please."

**Environmental Hazards**

Toxic sites may pose risks to residents living nearby and thus may constitute fair housing concerns if they disproportionately impact protected classes. A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. These sites are placed on the National Priorities List (NPL). There are three NPL sites and one proposed NPL site located in Bexar County, including the Bandera Road Ground Water Plume in Leon Valley; the Eldorado Chemical Co., Inc., in Live Oak; River City Metal Finishing in west Bexar County; and the R & H Oil Company in south San Antonio (proposed site, see Figure 24).
The Texas Commission on Environmental Quality also tracks brownfield locations in the county. An estimated 13 brownfield sites are located in the county, 11 of which are in central San Antonio, one of which is in San Antonio adjacent to the city of Windcrest in east Bexar County, and one of which is in the city of Converse, also in east Bexar County. Hispanic residents constitute most of the population in areas surrounding brownfield locations, particularly in central San Antonio (see...
The EPA’s National Air Toxics Assessment (NATA) estimates health risks from air toxics. The most recent assessment, released in 2018, uses data from 2014 to examine cancer risk from ambient concentrations of pollutants. Bexar County has overall low levels of cancer risk from air toxics—ranging from about 30 to 40 per million in county census tracts. Point sources of emissions are clustered west and south of the city of Kirby in east Bexar County, with fewer facilities dispersed across west and north Bexar County outside of the city of San Antonio (see Figure 26).
Figure 25. Brownfield Locations and Race/Ethnicity in Bexar County

Source: Texas Commission on Environmental Quality, 2021

Brownfields
- Bexar County
- City of San Antonio
- San Antonio International Airport
- Government Canyon State Natural Area
- Joint Base Camp Bullis

Race + Ethnicity
- 1 Dot = 100 People
- Hispanic or Latino (of any race)
- White, Non-Hispanic
- Black, Non-Hispanic
- Asian/ Pacific Islander, Non-Hispanic
- Multiple Races
- Native American, Non-Hispanic
- Other Race, Non-Hispanic
Figure 26. National Air Toxics Assessment

Source: United States Environmental Protection Agency

The Environmental Protection Agency’s Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. While toxic release inventory sites are located throughout the county, the greatest numbers of sites are clustered in central Bexar County (see Figure 27).

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Many individuals and families in the United States face challenges in accessing food that is both healthy and affordable. In neighborhoods in which the nearest grocery store is many miles away, transportation costs and lack of access to vehicles may pose particular challenges for low-income households, who may be forced to rely on smaller stores that are often unaffordable and may not offer a full range of healthy food choices. Even in areas with fresh food retailers nearby, the higher cost of healthy foods such as produce often present barriers to accessing healthy food.

Analysis of the most recently available USDA Food Research Atlas data, from 2015, indicates that the share of residents who are low income and live further than ½ mile from the nearest supermarket is highest in census tracts in south Bexar County. In eight census tracts in south Bexar County—including tracts in and around Von Ormy, Somerset, Sandy Oaks, and Elmendorf—more than 50% of residents have low incomes and live more than ½ mile from a supermarket. In 16 additional tracts in south and east Bexar County, between 40% and 50% of residents meet the USDA definition of low income and low access at ½ mile (see Figure 28).

In contrast, tracts in parts of north and central Bexar County tend to have the lowest proportions of residents with low incomes who live more than ½ mile from a supermarket. In 16 tracts in these areas, fewer than 7% of residents are considered low income and low access.

Figure 28. Food Access and Race/Ethnicity in Bexar County

Percent of Population Who Are Low-Income and Live More Than 1/2 Mile From a Food Store*

- 0% - 5%
- 5% - 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%
- 40% - 50%
- 50% - 60%
- 60% - 70%
- 70% - 90%

Race + Ethnicity
1 Dot = 100 People
- Hispanic or Latino (of any race)
- White, Non-Hispanic
- Black, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Multiple Races
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

*Defined as a supermarket, supercenter, or large grocery store

Issues of food insecurity in south Bexar County have also been highlighted in academic research. In the research brief Teaching & Learning in the Time of COVID-19 (2020), the University of Texas at San Antonio Urban Education Institute notes that while families in each school system surveyed reported experiencing food insecurity, defined as a disruption of food intake or eating patterns because of a lack of money and other resources, the highest rates of food insecurity were in the Edgewood Independent School District in the city of San Antonio (49%) and the Harlandale and Southwest Independent School Districts in south Bexar County (41%).

Stakeholders interviewed during this planning process also reported lower levels of food access in south Bexar County. Survey respondents echoed concerns surrounding food access, 57.5% noting that grocery stores and other shopping opportunities are not equally available in all neighborhoods.

In addition to distance from food outlets, the quality and affordability of fresh food available at those outlets are important factors in considering food access. Much of south Bexar County is served primarily by dollar stores or smaller food outlets, indicating that many residents need may access to vehicles to access one of the area’s larger supermarkets.

Poverty and a lack of access to vehicles also contribute to issues of food access and insecurity in the region. An estimated 15.7% of residents in Bexar County were living below the federal poverty level as of the 2015-2019 American Community Survey Five-Year Estimates, indicating that low incomes are a substantial barrier for a substantial portion of residents in accessing fresh food. Disparities in poverty rates exist by race: an estimated 27.3% of Native American residents, 18.6% of Hispanic residents, and 18.1% of Black residents were living below the poverty level in the past 12 months from 2015 to 2019, about double to triple the share of white non-Hispanic residents living in poverty (9.5%). Poverty rates are highest in parts of south, central, and east Bexar County, ranging from 31.5% to 39.3% in five census tracts.

Further, in many census tracts—particularly in central Bexar County—significant shares of households do not have a vehicle. More than 20% of households do not own a vehicle in parts of Wincrest, Leon Valley, and Balcones Heights. Low levels of vehicle ownership indicate that food access is particularly challenging for significant proportions of households in areas of the county with limited access to public transportation and low levels of walkability. In this way, the combination of uneven distribution of food outlets across the county, the substantial proportions of households with low incomes, and a lack of access to vehicles create barriers to food access and security.

Stakeholder Comment:
"We have a great urban farm, and the food bank has been a tremendous partner. There is a lot more that could be done to feed people and educate them on how to feed themselves using their backyard as a means for food production."

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Healthcare

Access to high-quality, affordable physical and mental healthcare shapes community health outcomes, including both length and quality of life factors. Residents of Bexar County have access to healthcare providers at a rate of 82.6 primary care physicians, 54.1 dentists, and 22.2 psychologists per 100,000 residents, indicating higher levels of access to healthcare providers than in the state of Texas overall (see Table 6).

Table 6. Healthcare Providers per 100,000 Residents, Bexar County and State of Texas, 2019

<table>
<thead>
<tr>
<th></th>
<th>Bexar County</th>
<th>Texas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Care Physicians</td>
<td>82.6</td>
<td>75.8</td>
</tr>
<tr>
<td>Dentists</td>
<td>54.1</td>
<td>47.7</td>
</tr>
<tr>
<td>Psychologists</td>
<td>22.2</td>
<td>16.4</td>
</tr>
</tbody>
</table>

Source: Texas Department of State Health Services, 2019

While residents in Bexar County have greater access to healthcare providers than those in the state of Texas overall, geographic disparities in access exist across the county. The Bexar County and Atascosa County Community Health Needs Assessment\(^\text{18}\) notes that primary care physicians in Bexar County tend to be clustered in the medical center, downtown, and Brooks areas of the city of San Antonio, while the east and westside of the county stand out as lacking primary care availability. As with primary care, the areas with the highest ratios of psychiatrists to population include the city of San Antonio’s medical center and downtown, as well as JBSA Fort Sam Houston.

The Community Health Needs Assessment identifies cost of care and access to health insurance as barriers to accessing healthcare in the region, noting that about one in five Behavioral Risk Factor Surveillance System\(^\text{19}\) survey respondents living in Bexar County reported that they needed to see a doctor in the past 12 months but could not because of the cost. Disparities exist across the county regarding access to health insurance. Residents in central, south, and east Bexar County tend to be uninsured at the highest rates in the region (25.3% to 39.3% uninsured residents in 16 census tracts), while parts of north and central Bexar County have the lowest percentages of insured residents (less than 4% uninsured in 12 census tracts, see Figure 22).

Stakeholder Comment:
“Domestic violence and mental health issues are rampant in the community and there are not many service providers who can help with these issues. There has also been in increase in domestic violence and mental health episodes due to the pandemic.”


Overall, healthcare access is shaped by multiple factors, including availability of providers, health insurance coverage, and access to vehicles or other transportation options. Programs designed to increase access to healthcare may help support access for underserved residents. These may include mobile clinics, development of community-based clinics in underserved areas, transportation assistance to support access to healthcare, community health workers, and sliding scale services for low-income uninsured residents, among others. Stakeholders who participated in this planning process noted a particular need for mental health services and transportation.

**Figure 29. Access to Health Insurance and Race/Ethnicity**
CHAPTER 6. HOUSING PROFILE

The availability of quality affordable housing plays a vital role in ensuring housing opportunities are fairly accessible to all residents. On the surface, high housing costs in certain areas are exclusionary based solely on income. But the disproportionate representation of several protected class groups in low and middle income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce.

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies have shown affordable housing encourages diverse, mixed-income communities, which result in many social benefits. Affordable housing also increases job accessibility for low and middle income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing. Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness. Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.

This section discusses the existing supply of housing in Bexar County. It also reviews housing costs, including affordability and other housing needs by householder income. Homeownership rates and access to lending for home purchases and mortgage refinancing are also assessed.

Housing Supply Summary

According to the 2015-2019 American Community Survey (ACS), there are 145,005 housing units in Bexar County (excluding the City of San Antonio), a 64% increase since 2000. The

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number of housing units in the San Antonio-New Braunfels MSA grew at a slower rate (+38%) over that time frame, to reach about 892,770 in 2019. The vacancy rate\textsuperscript{23} in Bexar County is estimated at about 7% according to 2015-2019 5-Year ACS data, up about 16 percentage points since 2000. Vacancy is higher in the region at about 9.1%.

### Table 7. Housing Units by Occupancy Status

<table>
<thead>
<tr>
<th></th>
<th>2000</th>
<th>2010</th>
<th>2014-2018</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Bexar County</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Housing Units</td>
<td>88,237</td>
<td>130,415</td>
<td>145,005</td>
<td>64.3%</td>
</tr>
<tr>
<td>Occupied Housing Units</td>
<td>83,468</td>
<td>119,085</td>
<td>134,845</td>
<td>616%</td>
</tr>
<tr>
<td>Vacant Housing Units</td>
<td>4,769</td>
<td>11,330</td>
<td>10,160</td>
<td>113.0%</td>
</tr>
<tr>
<td>Vacancy Rate</td>
<td>5.4%</td>
<td>8.7%</td>
<td>7.0%</td>
<td>+16% points</td>
</tr>
<tr>
<td><strong>San Antonio-New Braunfels MSA</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Housing Units</td>
<td>648,593</td>
<td>810,455</td>
<td>892,770</td>
<td>37.6%</td>
</tr>
<tr>
<td>Occupied Housing Units</td>
<td>601,265</td>
<td>726,502</td>
<td>811,335</td>
<td>34.9%</td>
</tr>
<tr>
<td>Vacant Housing Units</td>
<td>47,328</td>
<td>83,953</td>
<td>81,435</td>
<td>72.1%</td>
</tr>
<tr>
<td>Vacancy Rate</td>
<td>7.3%</td>
<td>10.4%</td>
<td>9.1%</td>
<td>+18% points</td>
</tr>
</tbody>
</table>

**Data Source:** 2000, 2010 U.S. Census and 2015-2019 5-Year ACS, Tables H003, DP04

Housing structure variety is important in providing options suitable to meet the needs of all residents, including different members of protected classes. Multifamily housing, including rental apartments, are often more affordable rental options than single-family homes for low- and moderate-income households, who are disproportionately likely to be non-white households. Multifamily units may also be the preference of some elderly and disabled householders who are unable or do not desire to maintain a single-family home.

Table 8 shows housing units by structure types in Bexar County. Single-family detached homes make up nearly 80% of housing units in the county. Mobile homes are the second most common structure type, comprising 6.8% of all housing units, followed by small multifamily developments of 5 to 19 units (6.2%). The county has smaller shares of large multifamily units (3.8%), duplexes, triplexes, and quadraplexes (2.2%), and single-family attached units (1.7%).

Housing supply in the San Antonio-New Braunfels MSA also consists largely of single-family detached units (67%). When compared to Bexar County, the region has larger shares of small multifamily housing (12%), large multifamily housing (8%) and duplexes, triplexes, and quadraplexes (5%).

\textsuperscript{23} The vacancy rate, calculated from ACS data, includes housing that is available for sale or rent, housing that has been rented or sold but not yet occupied, seasonal housing, and other vacant units. Therefore, the actual number of rental and for-sale units that are available for occupancy are likely lower than these figures indicate.
Table 8. Housing Units by Structure Type

<table>
<thead>
<tr>
<th>Units in Structure</th>
<th>Bexar County</th>
<th>San Antonio-New Braunfels MSA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>1, detached</td>
<td>115,188</td>
<td>79.4%</td>
</tr>
<tr>
<td>1, attached</td>
<td>2,396</td>
<td>17%</td>
</tr>
<tr>
<td>2-4</td>
<td>3,155</td>
<td>2.2%</td>
</tr>
<tr>
<td>5-19</td>
<td>8,920</td>
<td>6.2%</td>
</tr>
<tr>
<td>20 or more</td>
<td>5,480</td>
<td>3.8%</td>
</tr>
<tr>
<td>Mobile home</td>
<td>9,704</td>
<td>6.8%</td>
</tr>
<tr>
<td>Other (RV, boat, van, etc.)</td>
<td>162</td>
<td>0.1%</td>
</tr>
<tr>
<td>Total</td>
<td>145,005</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Data Source: 2015-2019 5-Year American Community Survey, Table B25024

Availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Neighborhoods with multi-bedroom detached, single-family homes will typically attract larger families, whereas dense residential developments with smaller unit sizes and fewer bedrooms often accommodate single-person households or small families. However, market forces and affordability impact housing choice and the ability to obtain housing of a suitable size, and markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups. Rising housing costs can, for example, lead to overcrowding as large households with lower incomes are unable to afford pricier, larger homes and are forced to reside in smaller units. On the other hand, people with disabilities or seniors with fixed incomes may not require large units but can be limited by higher housing costs in densely populated areas where most studio or one-bedroom units are located.

Table 9 shows the county’s housing units by the number of bedrooms and resident tenure (renters or homeowners). Looking at owned housing, most units (56%) have 2 to 3 bedrooms and a significant share have 4 or more bedrooms (43%). Renters in Bexar County live primarily in 2 or 3-bedroom units (61%), with a smaller share (16%) living in units with 4 or more bedrooms. Studio and one bedroom-units make up 24% of the county’s rental housing stock compared to only 1% of owned housing.

Smaller housing is more common in the MSA than in the county. Slightly less than two-thirds (65%) of homeowners live in 2–3-bedroom units and about one-third live in units with 4 or more bedrooms. On the rental side, small units (0-1 bedrooms) are more common in the MSA (30% of rental stock) and 4+ bedroom units are less so (7% of rental stock). These shares indicate that larger families might find more appropriately-sized rental housing in Bexar County than in the region. Conversely, single-person households and small families may find a larger supply of one-bedroom rental units in the region than in Bexar County.
Table 9. Housing Units by Size and Tenure

<table>
<thead>
<tr>
<th>Number of Bedrooms</th>
<th>Bexar County</th>
<th>San Antonio-New Braunfels MSA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>Owner-Occupied Housing Units</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Zero</td>
<td>448</td>
<td>0.4%</td>
</tr>
<tr>
<td>One</td>
<td>731</td>
<td>0.7%</td>
</tr>
<tr>
<td>Two or three</td>
<td>56,972</td>
<td>55.8%</td>
</tr>
<tr>
<td>Four or more</td>
<td>43,899</td>
<td>43.0%</td>
</tr>
<tr>
<td>Total</td>
<td>102,050</td>
<td>100.0%</td>
</tr>
<tr>
<td>Renter-Occupied Housing Units</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Zero</td>
<td>1,158</td>
<td>3.5%</td>
</tr>
<tr>
<td>One</td>
<td>6,436</td>
<td>19.6%</td>
</tr>
<tr>
<td>Two or three</td>
<td>20,073</td>
<td>61.2%</td>
</tr>
<tr>
<td>Four or more</td>
<td>5,128</td>
<td>15.6%</td>
</tr>
<tr>
<td>Total</td>
<td>32,795</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Note: Total add to the total number of occupied housing units in each geography. Unoccupied units are not included in this table because tenure data is not available for these units.

Data Source: 2015-2019 5-Year American Community Survey, Table B25042

Assessing housing conditions in an area can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of an area’s housing can have substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Additionally, homes built prior to 1978 present the potential for lead exposure risk due to lead-based paint or lead pipes carrying drinking water.

Age of housing in Bexar County is shown in Figure 30 below. American Community Survey data indicates that Bexar County’s housing stock is relatively new, with the largest share of housing units having been built after 1999 (54%). About one-quarter of housing in Bexar County (23%) was built prior to 1980, suggesting that risk of exposure to lead-based paint or lead pipes is an issue for some households in the county, although the share is lower than the share throughout the region (41%). Regionally, the largest decade-long span of housing development occurred between 2000 and 2009 (during which 19% of units were built), another 18% of units were built prior to 1960, indicating an older housing stock in the region than in Bexar County.
Figure 30. Age of Housing in Bexar County and the San Antonio-New Braunfels Region

Data Source: 2015-2019 ACS 5-Year Estimates, Table B25034

Housing Costs and Affordability

Affordability is the most common housing need identified by stakeholders, particularly for low- and moderate-income households. The National Low Income Housing Coalition’s annual Out of Reach report examines rental housing rates relative to income levels for counties throughout the U.S. The figure on the next page shows annual household income and hourly wages needed to afford Fair Market Rents (FMRs)\(^{24}\) in for one, two, and three-bedroom rental units.

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\(^{24}\)Fair Market Rent (FMR) is a standard set by HUD at the county or regional level for use in administering its Section 8 rental voucher program. FMRs are typically the 40th percentile gross rent (i.e., rent plus utility costs) for typical, non-substandard rental units in the local housing market.
Figure 31 Required Income, Wages, and Hours to Afford Fair Market Rents in Bexar County, 2020

**Housing Costs (Fair Market Rents)**
- 1 Bedroom: $851
- 2 Bedroom: $1,051
- 3 Bedroom: $1,372

**Required Annual Income**
- $34,040
- $42,040
- $54,880

**Wage for 40 Hour Week**
- $16.37/hour
- $20.21/hour
- $26.38/hour

**Hours at Min. Wage**
- 90 hours
- 112 hours
- 146 hours

**Hours at Avg. Renter Wage**
- 40 hours
- 49 hours
- 64 hours

**Required Annual Income**
- $34,040
- $42,040
- $54,880

**Wage for 40 Hour Week**
- $16.37/hour
- $20.21/hour
- $26.38/hour

**Hours at Min. Wage**
- 90 hours
- 112 hours
- 146 hours

**Hours at Avg. Renter Wage**
- 40 hours
- 49 hours
- 64 hours

**Note:** Required income is the annual income needed to afford Fair Market Rents without spending more than 30% of household income on rent. The minimum wage in Bexar County is $7.25. Average renter wages are $16.43 in Bexar County. Figures presented in this data are for Bexar County including the city of San Antonio.

**Source:** National Low Income Housing Coalition Out of Reach 2020, Accessed from https://reports.nlihc.org/oor/texas

Approximately 23% of Bexar County’s rental units are studios or 1-bedroom units. To afford a one-bedroom rental unit at the FMR of $851 without being cost burdened (i.e., spending more than 30% of income on housing) would require an annual income of at least $34,040. This amount translates to a 40-hour work week at an hourly wage of $16.37. It would take a 90-hour work week at the minimum wage of $7.25 to afford the same one-bedroom unit. According to the Out of Reach Report, average renter wages in Bexar County are $16.43, which are nearly equal to the required annual income for a one-bedroom unit at fair market rent.25

While one-bedroom units in Bexar County are affordable at average renter wages, these units only account for 20% of renter housing. Over 60% of the county’s rental housing units have two or three bedrooms. A household could afford the two-bedroom FMR of $1,051 with an annual income of $42,040 or higher, or a 40-hour work week at an hourly wage of $20.21. A minimum wage worker would need to work 112 hours per week to afford a two-bedroom unit. Someone earning the average renter wage would have to work 49 hours per week to afford a two-bedroom unit. A three-bedroom unit would be increasingly unaffordable to workers earning the average renter wage. Fair market rents for three-bedroom units are $1,372 per month and require an hourly wage of $26.38. Overall, this data indicates that housing at fair market rents is largely unaffordable to Bexar County residents earning the minimum wage, or even the average renter wage.

The American Community Survey also provides 2015-2019 5-year estimates on monthly renter and homeowner costs. Figure 32 indicates that around one-third (33%) of all Bexar County rental units cost less than $999 per month. Twelve percent (12%) rented for less than $750 and would be considered affordable for workers earning Bexar County’s average renter wages. More than one-third (36%) of all rental units cost between $1,000 and $1,499 per month, while another 29% exceeded $1,500 per month. Given these rental costs, individuals earning even average renter wages ($16.43/hour) and working a 40-hour work week might struggle to find a one-bedroom unit.

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25 The average renter wage was derived by the National Low Income Housing Coalition from the Bureau of Labor Statistics’ Quarterly Census of Employment and Wages data for the purpose of evaluating local housing affordability.
unit at fair market rent. The limited supply of affordable rental units, especially compared to local wages, has implications for families of all sizes, particularly single-parent households.

**Figure 32. Gross Rent for Renter Households in Bexar County and the San Antonio-New Braunfels MSA**

<table>
<thead>
<tr>
<th>Gross Monthly Rent</th>
<th>Bexar County (excluding San Antonio)</th>
<th>Bexar County Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under $500</td>
<td>3%</td>
<td>7%</td>
</tr>
<tr>
<td>$500-$749</td>
<td>9%</td>
<td>13%</td>
</tr>
<tr>
<td>$750-$999</td>
<td>21%</td>
<td>28%</td>
</tr>
<tr>
<td>$1,000-$1,499</td>
<td>36%</td>
<td>37%</td>
</tr>
<tr>
<td>$1,500-$1,999</td>
<td>12%</td>
<td>19%</td>
</tr>
<tr>
<td>$2,000-$2,499</td>
<td>2%</td>
<td>7%</td>
</tr>
<tr>
<td>$2,500 or more</td>
<td>3%</td>
<td>1%</td>
</tr>
</tbody>
</table>

**Data Source:** 2015-2019 ACS 5-Year Estimates, Table B25063

Figure 33 indicates that for many households, homeownership in Bexar County is more expensive than renting. While around one-third (32%) of homeowners spend less than $999 on housing costs, nearly half (49%) spend more than $1500 on housing costs. These figures indicate that a large share of housing is considered unaffordable in the county, with homeownership being less affordable overall than renting. The next section looks in more detail at housing needs in Bexar County.
Figure 33. Monthly Owner Costs for Owner Households with a mortgage in Bexar County and the Bexar County Region

Data Source: 2015-2019 ACS 5-Year Estimates, Table B25094

Housing Needs

Housing cost and condition are key components to housing choice. Housing barriers may exist in a jurisdiction when some protected class groups have greater difficulty accessing housing in good condition and that they can afford. To assess affordability and other types of housing needs, HUD defines four housing problems:

- A household is cost burdened if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
- A household is overcrowded if there is more than 10 people per room, not including kitchen or bathrooms.
• A housing unit lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.

• A housing unit lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U.S. Census Bureau’s American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for Bexar County and the region is provided in the tables that follow.

In Bexar County, approximately 27% of all households (36,145 households) have at least one housing problem. Around 13% of the county’s households (16,740 households) have a severe housing problem. Both housing problems and severe housing problems occur at higher rates in the region, where 32% of households have a housing problem and 17% have a severe housing problem. As discussed in the previous section, Bexar County’s newer housing stock may account for its comparatively lower rates of housing problems.

Looking at housing needs by the race and ethnicity of the householder, Native American households experience disproportionate rates of housing problems in Bexar County (39% have a housing problem). Slightly less than one-third of all Hispanic, Asian, and Other, non-Hispanic households have a housing problem in the county. Black and White households have the lowest rates of housing problems in Bexar County, affecting 28% and 23% of these groups, respectively. In the region, Black households experience the highest rates of housing problems (38%), followed by Hispanic households (36%), and Other, non-Hispanic and Asian households (33%). White households again have the lowest share of housing problems in the region (25%). The percentage of households with housing problems increases for every group in the region (when compared to Bexar County) except for Native American households. Housing problems for Native American households decline in the region to 32%.

None of the listed racial or ethnic groups is disproportionately affected by severe housing problems in Bexar County. However, Native American households continue to have the highest rates of severe housing problems in the county (18% have a severe housing problem). Around 15% of the county’s Hispanic, Asian and Other, Non-Hispanic households have a severe housing problem. 13% of Black households and 10% of White households also have severe housing problems. As with housing problems, severe housing problems also increase at the regional level. 20% of Black and Hispanic households and 19% of Asian households have severe housing problems in the region. Other, non-Hispanic and White households also see an increase of severe housing problems in the region (up to 13% and 12%, respectively). Native American households again experience a decrease in the region (down to 15%).
Table 10 also shows rates of housing problems based on the size of the household. Family sizes examined here include small families with fewer than 5 members, large families with 5 or more members, and non-family households which include single persons and unrelated adults living together. Slightly more than one-third of all non-family households (35%) and large families (34%) have housing problems. Smaller families experience housing problems at lower rates (22%) than other household types.

Table 11 examines severe housing cost burden in Bexar County. Approximately 9% or 12,520 households in the county spend more than 50% of their monthly income on housing costs. Native American households have the highest rates of severe cost burden (with 14% affected). White households are the only group with below average rates of severe cost burden (8.5%). All other groups have above average rates of severe cost burden, with 10% of Hispanic and Other, non-Hispanic households and 11% of Black and Asian households being severely cost burdened. At the regional level, around 12% of all households are severely cost burdened. Black households have the highest rates of severe cost burden in the region (17%). Here again, severe cost burdens again occur at higher rates for all households except for Native American households, for whom severe cost burdens decline to 12%.

Table 11 also discusses severe housing cost burden by household size. Non-family households have the greatest rate of severe cost burden in the county (18%). Families, both large and small, experience housing cost burdens at rates between 7-8%. In the region, 22% of non-family households pay more than 50% of their incomes on housing costs, compared to 9% of small families and 10% of large families.

Table 10. Demographics of Households with Disproportionate Housing Needs

<table>
<thead>
<tr>
<th>Disproportionate Housing Needs</th>
<th>Bexar County</th>
<th>San Antonio-New Braunfels MSA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Households Experiencing any of the Four Housing Problems</td>
<td># with problems</td>
<td># of households</td>
</tr>
<tr>
<td>Race and Ethnicity</td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>14,935</td>
<td>64,635</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>3,560</td>
<td>12,715</td>
</tr>
<tr>
<td>Hispanic</td>
<td>15,745</td>
<td>50,075</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>970</td>
<td>3,180</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>140</td>
<td>362</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>795</td>
<td>2,670</td>
</tr>
<tr>
<td>Total</td>
<td>36,145</td>
<td>133,637</td>
</tr>
<tr>
<td>Household Type and Size</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Family households, &lt;5 People</td>
<td>18,300</td>
<td>82,485</td>
</tr>
<tr>
<td>Family households, 5+ People</td>
<td>6,525</td>
<td>19,145</td>
</tr>
<tr>
<td>Non-family households</td>
<td>11,335</td>
<td>32,005</td>
</tr>
</tbody>
</table>
### Households Experiencing any of the Four Severe Housing Problems

<table>
<thead>
<tr>
<th>Race and Ethnicity</th>
<th># with problems</th>
<th># of households</th>
<th>% with problems</th>
<th># with problems</th>
<th># of households</th>
<th>% with problems</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>6,400</td>
<td>64,635</td>
<td>9.9%</td>
<td>39,813</td>
<td>332,676</td>
<td>12.0%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>1610</td>
<td>12,705</td>
<td>12.7%</td>
<td>11004</td>
<td>55,027</td>
<td>20.0%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>7,785</td>
<td>50,090</td>
<td>15.5%</td>
<td>76,180</td>
<td>377,790</td>
<td>20.2%</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>475</td>
<td>3,165</td>
<td>15.0%</td>
<td>3,359</td>
<td>17,350</td>
<td>19.4%</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>65</td>
<td>357</td>
<td>18.2%</td>
<td>213</td>
<td>1443</td>
<td>14.8%</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>405</td>
<td>2,685</td>
<td>15.1%</td>
<td>2,028</td>
<td>11,435</td>
<td>17.7%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>16,740</strong></td>
<td><strong>133,642</strong></td>
<td><strong>12.5%</strong></td>
<td><strong>132,597</strong></td>
<td><strong>795,721</strong></td>
<td><strong>16.7%</strong></td>
</tr>
</tbody>
</table>

**Note:** All % represent a share of the total population, except household type and size, which is out of total households.

**Source:** CHAS, Tables 1, 2, 4, 9

### Table 11. Demographics of Households with Severe Housing Cost Burdens

<table>
<thead>
<tr>
<th></th>
<th>Bexar County</th>
<th>San Antonio-New Braunfels MSA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td># with problems</td>
<td># of households</td>
</tr>
<tr>
<td><strong>Race and Ethnicity</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>5,515</td>
<td>64,635</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>1,395</td>
<td>12,705</td>
</tr>
<tr>
<td>Hispanic</td>
<td>4,945</td>
<td>50,085</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>350</td>
<td>3,170</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>50</td>
<td>360</td>
</tr>
<tr>
<td>Other, Non-Hispanic</td>
<td>265</td>
<td>2,675</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>12,520</strong></td>
<td><strong>133,630</strong></td>
</tr>
</tbody>
</table>

### Household Type and Size

<table>
<thead>
<tr>
<th></th>
<th>Bexar County</th>
<th>San Antonio-New Braunfels MSA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td># with problems</td>
<td># of households</td>
</tr>
<tr>
<td>Family households, &lt;5 People</td>
<td>6,275</td>
<td>83,930</td>
</tr>
<tr>
<td>Family households, 5+ People</td>
<td>1285</td>
<td>17,675</td>
</tr>
<tr>
<td>Non-family households</td>
<td>4,985</td>
<td>27,850</td>
</tr>
</tbody>
</table>

**Note:** Severe housing cost burden is defined as greater than 50% of income. All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. The # of households is the denominator for the % with problems, and may differ from the # of households for the table on severe housing problems.

**Source:** CHAS, Tables 7, 9
The maps that follow indicate the prevalence of housing problems in Bexar County (outside of San Antonio), along with population by race, ethnicity, and national origin. Rates of housing burden are greatest for several census tracts partially located within San Antonio, including census tract 1817.05 covering southwest Leon Valley (52%), census tract 1808 in Balcones Heights (46%), census tract 1315.06 shared with eastern Kirby (44%), and census tract 1612 south of Old Pearsall Road and west of Palo Alto Road (43%). One census tract that is completely outside the City of San Antonio - census tract 1619.02 in the southwestern corner of Bexar County - also experiences higher rates of housing burden (40%).

Looking at these census tracts by race and ethnicity, Hispanic households are the largest demographic in census tracts with the high rates of housing problems (Figure 39). Foreign-born residents from Mexico are also more likely than other foreign-born residents to live in census tracts with higher rates of housing problems (Figure 40). Census tract 1619.02 in SW Bexar County, for example, has the second highest number of residents born in Mexico (967 residents). The five census tracts mentioned above tend to have newer housing stock overall, except for Balcones Heights, where 90% of housing units were built before 1970. However, median incomes in these census tracts – particularly those nearest to San Antonio – range from $29,815 - $55,610, which falls below the county’s median income of $57,157. Census tract 1619.02 remains an outlier, with a median income of $67,537.

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26 See ACS 5-Year Estimates, 2015-2019, Table S3303.
Figure 34. Housing Burden and Race and Ethnicity in Bexar County

Source: 2013-2017 CHAS, 2019 5-Year ACS Estimates
Figure 35. Housing Burdens and National Origin in Bexar County

Source: 2013-2017 CHAS, 2019 5-Year ACS Estimates

Percent Households with Housing Burden
- <20%
- 20.1% - 30%
- 30.1% - 40%
- 40.1% - 50%
- 50.1% - 60%
- 60.1% - 70%

National Origin
- Mexico
- India
- The Philippines
- Honduras
- El Salvador
- Vietnam
- China Excluding Hong Kong
Homeownership and Lending

Homeownership is vital to a community’s economic well-being. It allows the opportunity to build wealth, is generally associated with higher levels of civic engagement, and is correlated with positive cognitive and behavioral outcomes among children. Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the white and Black homeownership rate is the largest among racial and ethnic groups. In 2017, the U.S. Census Bureau reported a 216 percentage point gap in homeownership rate between white and Black households; just a 2.9 percentage point decrease since 1997.

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is 8 percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference to urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable houses.

The table that follows shows the number of owner and renter households, as well as the homeownership rate, by race and ethnicity for Bexar County. Homeowners make up nearly three-fourths (74%) of all households in Bexar County. The highest rates of homeownership are held by White households (78%). Other, Non-Hispanic households have homeownership rates closest to the county’s average (74%), while Asian, Native American and Hispanic have homeownership rates slightly below average (between 72-73%). Black households in Bexar County have the lowest homeownership rates of all groups (64%).

Across the Bexar County region, homeownership rates are lower for all racial and ethnic groups. White households experience a small decline in homeownership in the region (down to 71%). Native American households also experience only a slight decline in homeownership rates (down to 68%). However, Hispanic homeownership rates decrease by 14-percentage points in the region (58%), with Asian, Other, Non-Hispanic, and Black households experiencing a 20-percentage point decline in homeownership in the region (54%, 54% and 44%, respectively).

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The maps that follow show the share of owners and renters by census tract in Bexar County. As the maps indicate, homeownership rates are high throughout Bexar County, with very few census tracts having homeownership rates below 40%. The highest homeownership rates are found in census tracts containing the cities of Shavano Park (97-99%) and Hollywood Park (98%). Outside of Randolph Air Force Base, renter rates are highest in census tract 1808 containing Balcones Heights. Here, renter rates reach 81% of all households. Census tract 1216.01, which has the second largest renter rate, sits adjacent to Randolph AFB.
### Table 12. Homeownership and Rental Rates by Race and Ethnicity

| Householder Race/Ethnicity | Bexar County | | | San Antonio-New Braunfels MSA | | | |
|---------------------------|--------------|----------------|----------------|------------------------|----------------|----------------|
|                           | Owner Households | Renter Households | Home-ownership Rate | Owner Households | Renter Households | Home-ownership Rate |
|                           |               |                 |                  |               |                 |                  |
| Non-Hispanic              |               |                 |                  |               |                 |                  |
| White                     | 50,605        | 14,030          | 78.3%            | 236,725       | 95,985           | 71.2%            |
| Black                     | 8,085         | 4,620           | 63.6%            | 24,285        | 30,510           | 44.3%            |
| Asian                     | 2,315         | 855             | 73.0%            | 9,294         | 8,059            | 53.6%            |
| Native American           | 260           | 100             | 72.2%            | 990           | 470              | 67.8%            |
| Other                     | 1,985         | 690             | 74.2%            | 6,150         | 5,265            | 53.9%            |
| Hispanic                  | 36,105        | 13,980          | 72.1%            | 220,300       | 157,460          | 58.3%            |
| **Total**                 | **99,355**    | **34,275**      | **74.4%**        | **497,754**   | **297,749**      | **62.6%**        |

**Note:** Data presented are number of households, not individuals.

**Source:** CHAS Table 9
Figure 36. Share of Households that are Owners in Bexar County

Source: 2013-2017 CHAS
Figure 37. Share of Households that are Renters in Bexar County

Source: 2013-2017 CHAS
Mortgage Lending

Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The proceeding data and analysis assesses the degree to which the housing needs of local residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The national 2019 HMDA data consists of information for 15.1 million home loan applications reported by 5,508 home lenders, including banks, savings associations, credit unions, and mortgage companies. HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income.

The source for this analysis is tract-level HMDA data for census tracts in Bexar County in 2019, which includes a total of 49,745 home purchase loan application records. Within each record, some data variables are 100% reported: “Loan Type,” “Loan Amount,” and “Action Taken,” for example, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant declined to identify their sex, race and/or ethnicity. Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. If the missing data are non-random there may be adverse impacts on the accuracy of the analysis. Ideally, any missing data for a specific data variable would affect a small proportion of the total number of loan records and therefore would have only a minimal effect on the results.

Of total mortgage loan applications during the year examined, 13.5% were denied. There is no requirement for reporting reasons for a loan denial, and this information was not provided for about 0.4% of home purchase loan denials and 0.8% of refinance loan denials. Further, the HMDA data does not include a borrower’s total financial qualifications such as an actual credit score, property type and value, or loan product choices. Research has shown that differences in denial rates among racial or ethnic groups can arise from these credit-related factors not available in

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32 Includes applications for the purchase or refinance of one-to-four family dwellings in which the property is or will be occupied as the owner’s principal dwelling and in which the mortgage will be secured as first lien. Includes applications for conventional, FHA-insured, VA-guaranteed, and FSA/RHS-guaranteed loans.

33 HMDA data provided in this section excludes those census tracts found entirely within the City of San Antonio.
the HMDA data. Despite these limitations, the HMDA data play an important role in fair lending enforcement. Bank examiners frequently use HMDA data in conjunction with information from loan files to assess an institution’s compliance with fair lending laws.

Complete information about applicant race, ethnicity, and income is available for 24,193 purchase and refinancing loan applications, or about 48% of all applications. Thirty-nine percent of applications were by Hispanic applicants and 31% by White applicants. Black and Asian applicants made up 8% and 4% respectively, followed by Other, non-Hispanic applicants at 3%. Compared to all Bexar County households, this breakdown indicates that Hispanic households are nearly equally represented among loan applications compared to their share of households countywide (39% of loans versus 37% of all households). Asian households, too, are slightly overrepresented in their share of mortgage applications (4% of all applications, 2% of all households), as are Other, non-Hispanic applicants (3% of loan applications versus 2% of the households). Black applicants are slightly underrepresented in mortgage loan applications (8% of all applications, 10% of all households). White households are the most underrepresented group among loan applications (31% of loans versus 48% of all households).

The table that follows shows loan approval rates for completed loan applications by race and ethnicity at various income levels in Bexar County (including the city of San Antonio). The county’s median income according to HUD FY 2019 Income Limits was $70,000. The income tiers below represent low-income applicants earning up to 80% AMI ($56,800), middle income applicants earning between 80% to 120% AMI ($56,801 to $85,200), and high-income applicants earning more than 120% AMI (over $85,201). Not included in these figures are applications that were withdrawn or closed due to incompleteness such that no decision was made regarding approval or denial.

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35 The low-income category includes applicants with a household income at or below 80% of area median family income (MFI). The middle income range includes applicants with household incomes from 81% to 120% MFI, and the upper income category consists of applicants with a household income above 150% MFI.
### Table 13. Home Purchase Loan Approval Rates by Race and Ethnicity in Bexar County, 2017

<table>
<thead>
<tr>
<th>Applicant Income</th>
<th>Applicant Race and Ethnicity</th>
<th>All Applicants</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Non-Latino</td>
<td></td>
</tr>
<tr>
<td></td>
<td>White</td>
<td>Black</td>
</tr>
<tr>
<td>Low Income</td>
<td>1,189</td>
<td>414</td>
</tr>
<tr>
<td></td>
<td>14.8%</td>
<td>22.4%</td>
</tr>
<tr>
<td>Middle Income</td>
<td>1,161</td>
<td>536</td>
</tr>
<tr>
<td></td>
<td>8.9%</td>
<td>14.7%</td>
</tr>
<tr>
<td>High Income</td>
<td>3,814</td>
<td>704</td>
</tr>
<tr>
<td></td>
<td>7.0%</td>
<td>14.6%</td>
</tr>
<tr>
<td>All Applicants</td>
<td>7,452</td>
<td>2,021</td>
</tr>
<tr>
<td></td>
<td>9.6%</td>
<td>16.4%</td>
</tr>
</tbody>
</table>

**Note:** “Completed applications” includes applications that were approved but not accepted, denied, and approved with a loan originated. It does not include applications withdrawn by the applicant or closed for incompleteness.

**Data Source:** FFIEC 2019 Home Mortgage Disclosure Act Data, Accessed via [www.consumerfinance.gov/data-research/hmda](http://www.consumerfinance.gov/data-research/hmda)

HMDA data indicate that around 14% of all mortgage applications were denied in 2019. Slightly more than one-fifth (21%) of all applications from low-income earners were denied. For middle-income earners, 13% of these applicants were denied a loan, as were applications from 10% of all high-income earners. Looking at these figures by race and ethnicity, Hispanic applicants were denied mortgages at a rate slightly above the county average (15%), despite having the largest number of applicants overall (9,446 applicants). Approximately 22% of low-income Hispanic applicants were denied a mortgage. This percentage fell to 14% for middle-income applicants and 11% for high-income applicants. Asian and Black applicants also had above average rates of loan denial. Overall, Asian applicants experienced a denial rate of around 15%, while Black applicants were denied at a rate of 16%. Above average denial rates occurred especially at low incomes (29% of Asian households, 22% of Black households), and high incomes (13% of Asian applicants, 15% of Black applicants).

Groups experiencing below average rates of mortgage loan denial include Other, non-Hispanic and White applicants. Overall, 13% of Other, non-Hispanic and 10% of White applicants were denied mortgages. Denial affected less than one-fifth (19%) of low-income applicants of Other races, along with 15% of middle-income earners and 8% of high-income earners. Low-income White applicants were denied at a rate of 15%, nearly equivalent to the denial rate for high-income Black applicants. At middle incomes, 9% of White applicants were denied mortgages, while 7% of high-income earners were denied.
These gaps indicate that at middle and high incomes, many non-white applicants have reduced access to homeownership. Despite Hispanic applicants applying for mortgages in larger numbers than White applicants, they are less likely to have those loan applications approved. This data suggests that resources are needed to expand access to homeownership, including homebuyer readiness classes or other assistance, downpayment assistance programs, and support for households in the process of applying for a loan. Bexar County can also meet with local lenders to inform them of goals for furthering fair housing, discuss lending patterns related to homeownership identified in this AI, and build potential partnerships for expanding access to mortgages.

Zoning, Affordability, and Housing Choice

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. “The land use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.” Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region’s potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing. The following sections will explore the zoning codes in several Bexar County cities with a population over 5,000 – specifically Alamo Heights, Converse, Helotes, Kirby, Leon Valley, Live Oak, Schertz, and Universal City – and examine how these ordinances impact housing affordability and fair housing choice.

Local Zoning Ordinance Review

The Federal Fair Housing Act and the Texas Fair Housing Act prohibit discrimination in housing based on race, color, religion, national origin, ancestry, sex, disability, and familial status. The Fair Housing Act, in particular, takes precedence over local and state laws. Therefore, where conflicts arise between local laws and the Fair Housing Act, those instances will be indicated below. Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any specific form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;

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• Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;
• Placing administrative and siting constraints on group homes for persons with disabilities;
• Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
• Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

The treatment of these issues is explored for the cities of Alamo Heights, Converse, Helotes, Kirby, Leon Valley, Live Oak, Schertz, and Universal City (all Bexar County participating jurisdictions with populations over 5,000) in the narrative below.

**Alamo Heights**

**Housing for Persons with Disabilities**

The Alamo Heights zoning ordinance does not define specific housing types serving persons with disabilities, such as group homes or congregate living. Residential uses listed in the city’s land use schedule include one-family dwellings (detached and attached), two-family dwellings, modular or manufactured housing and multifamily dwellings. Group homes are also not listed under any commercial use. The ordinance prohibits any other uses or buildings other than those indicated in the schedule of permitted uses, which indicates that the group home use is prohibited in the city (see Section 3-8), which may discriminate against housing types serving persons with disabilities.

Looking at the definition of “family” in the ordinance helps identify whether housing types serving unrelated persons with disabilities are treated differently than housing for persons without disabilities. Alamo Heights’ zoning ordinance defines family as “One (1) or more individuals living together as a single housekeeping unit, in which not more than two (2) individuals are unrelated by blood, marriage or adoption.” By allowing up to two unrelated persons to live together in a “family,” the ordinance may unintentionally impose disparate treatment on housing types which allow unrelated persons with disabilities to live together.

**Reasonable Accommodations**

For persons with disabilities seeking to live alone or in a community setting, a reasonable accommodations ordinance can help the resident(s) make alterations to their unit without acquiring an approved variance or undergoing a public hearing. Alamo Heights does not currently have a reasonable accommodation ordinance. However, given the city’s zoning district regulations on side and rear yard projections, a reasonable accommodations ordinance may help reduce barriers to accessibility for persons with disabilities.

**Affordable Housing**

Land use regulations which are overly restrictive may have the effect of limiting the supply of affordable housing. Except for ordinances related to articulations and projections, Alamo Heights’ single family district requirements are not overly restrictive. The SF-A and SF-B single
family dwelling districts allow dwellings to be located on lots as small as 7500 SF (less than \( 1 \frac{5}{4} \)th of an acre). These districts require a minimum setback of 25’ for the front yard and 10’ for a side yard with a driveway.

Attached single family dwellings and two-family dwellings are allowed in the SF-C and MF-D districts. Multifamily dwellings are allowed in the MF-D district. The city’s 2013 Zoning Map indicates that a large share of residential land in the city’s southeast corner is zoned MF-D.\(^{37}\) The concentration of these uses in one area, however, may also have the effect of concentrating residents with lower incomes (often belonging to protected classes) in one area of the city. Alamo Heights can expand housing access to protected classes by allowing attached single family in single family residential districts, or by integrating SF-C or MF-D-zoned lots into concentrated single family residential districts.

Alamo Heights may also consider adopting accessory dwelling units as a permitted use. The city currently allows accessory dwellings for servant’s or caretaker’s quarters. However, the ordinance specifically states that the dwelling must be used for persons employed on the premises and cannot be rented or used as a separate living space. The addition of ADUs as a separate living space may create additional housing options for persons with limited incomes. The city prohibits all modular and manufactured housing, including mobile homes, from all residential districts. Due to these restrictions on ADUs and mobile homes, the city may benefit from identifying additional methods to expand affordable housing in the city.

Converse

Housing for Persons with Disabilities

Converse’s zoning ordinance does not define residential types for persons with disabilities, such as group homes or congregate living, and no similar use is allowed by right in any residential zoning district. Land uses that are not permitted by right must complete the special use permit process, which includes a public hearing before the city council. However, the ordinance allows the city council to approve residential uses not listed in the ordinance through its special use permit process. While the special use permit provides an opportunity for a group home or other residence for persons with disabilities to be approved by council, the public hearing process is often subject to public subjectivity and may limit the number or placement of this protected housing type.

Reasonable Accommodations

For persons with disabilities seeking to live alone or in a community setting, a reasonable accommodations ordinance can help the resident(s) make alterations to their unit without acquiring an approved variance or undergoing a public hearing. Converse does not currently have a reasonable accommodation ordinance. HUD strongly suggests the adoption of a reasonable accommodation ordinance to improve regulatory processes for persons seeking to make their homes more accessible.

Affordable Housing

Land use regulations which are overly restrictive may have the effect of limiting the supply of affordable housing. Overall, Converse’s single family district requirements are not overly restrictive, with an exception for the ordinance’s requirements for lot depth. Lot depth requirements are a minimum of 130’ in the R-1 Single Family Dwelling District and 110’ in the R-2 Duplex Residential District and R-6 Single Family District. These larger lot sizes may increase land costs and reduce affordability for the construction of single-family homes.

Apartments, multi-family dwellings, and townhomes are allowed in Converse’s R-3 Multifamily Apartment District. Lot size requirements are not overly restrictive, allowing 4,500 square feet for each single-family dwelling unit and 6,000 square feet + 600 square feet for each unit greater than two. However, the ordinance also requires 75% of the exterior walls to be composed of masonry. While this may add aesthetic value to multifamily developments, this requirement may also have the effect of making such projects cost prohibitive or too costly for affordable housing development.

Converse may also consider adopting accessory dwelling units as a permitted use. The city currently allows accessory dwellings for servant’s or caretaker’s quarters. However, the ordinance specifically states that the dwelling must be used for persons employed on the premises and cannot be rented or used as a separate living space. The addition of ADUs as a separate living space may create additional housing options for persons with limited incomes. Mobile and manufactured housing, another form of affordable housing, is allowed by right in the city’s R-5 Mobile Home/Manufactured Home District.

Helotes

Housing for Persons with Disabilities

While Helotes’ zoning ordinance does not define residential types for persons with disabilities, such as group homes, the city’s permissive definition of family allows unrelated persons with disabilities to live together as a single unit. The city defines “Family” as:

’a collective number of individuals domiciled together in one dwelling unit whose relationship is of a continuing non-transient domestic character and who are cooking and living as a single nonprofit housekeeping unit. This definition shall not include any society, club, fraternity, sorority, association, lodge, organization, or group of students or other individuals whose domestic relationship is of a transitory or seasonal nature or for an anticipated limited duration of a school term or other similar determinable period.’

Reasonable Accommodations

For persons with disabilities seeking to live alone or in a community setting, a reasonable accommodations ordinance can help the resident(s) make alterations to their unit without acquiring an approved variance or undergoing a public hearing. Helotes does not currently have a reasonable accommodation ordinance. HUD strongly suggests the adoption of a reasonable
accommodation ordinance to improve regulatory processes for persons seeking to make their homes more accessible.

Affordable Housing

Land use regulations which are overly restrictive may have the effect of limiting the supply of affordable housing. Helotes’ zoning ordinance allows “cluster development” of townhouses and other multifamily housing as overlays of the city’s R-1 single family district. Multifamily cluster development is allowed at a maximum density of 30 units per acre, while townhouse cluster development is allowed at a maximum density of 10 units per acre. Required setbacks for cluster development also tend to be small: multifamily clusters require a 20’ front yard setback and 5’ side yard setback; townhouses require a 5’ front yard setback and 0’ side yard setback.

However, there are two regulatory barriers which might limit the construction of multifamily units. Cluster developments require a 200’ buffer between multifamily units/townhouses and the nearest property line of any property zoned PD, R-1, R-2, or R-3. Given the city’s limited development area, this requirement creates a regulatory barrier for multifamily development. Secondly, cluster development overlays require approval from the city council. Given this additional regulatory, the city essentially prohibits multifamily units by right and requires all multifamily development to undergo council approval. City council approval, accompanied by a public hearing process, is often subject to public subjectivity and may limit the number or placement of affordable housing in the city. By removing these two regulatory barriers, Helotes can increase opportunities for additional multifamily and affordable housing opportunities in the city.

Another way to improve access to housing for protected classes is through the provision of alternative housing types, such as accessory dwelling units and mobile/manufactured homes. The city allows mobile homes by right in its Mobile Home District (R-3) as well as “associated living quarters” (ALQs) in all single-family residential districts. However, the ordinance prohibits ALQs from being rented out. The city may choose to expand its affordable housing supply by allowing ALQs to be rented to long-term renters.

Kirby

Housing for Persons with Disabilities

Kirby’s zoning ordinance does not provide definitions related to residential uses, including those serving persons with disabilities such as group homes or congregate living. No similar use is allowed by right in any residential zoning district. While Kirby does not explicitly define the term “family,” the city’s R-1 Single Family Dwelling District regulations note that “No more than 3 individuals who are unrelated by blood, legal adoption, or marriage may occupy a single-family dwelling unless otherwise required by law” (see § 153.016(A)). With this caveat, up to 3 unrelated persons with disabilities could share a single-family residence by right.

Reasonable Accommodations

For persons with disabilities seeking to live alone or in a community setting, a reasonable accommodations ordinance can help the resident(s) make alterations to their unit without
acquiring an approved variance or undergoing a public hearing. Kirby does not currently have a reasonable accommodation ordinance. HUD strongly suggests the adoption of a reasonable accommodation ordinance to improve regulatory processes for persons seeking to make their homes more accessible.

**Affordable Housing**

Kirby allows multifamily units by right in the R-2 Multifamily Dwelling District. District regulations for multifamily development allow a comparatively low maximum density of 12 units per acre. However, area requirements are not overly restrictive. Structures are allowed at a maximum height of 45’ and a minimum lot size of 10,000 square feet for the first three dwellings, plus 3,630 square feet for each additional dwelling. The city’s zoning map, however, offers few locations currently zoned R-2. By increasing the share of land zoned for multifamily, the city can help to expand its supply of affordable housing.

Another way to improve access to housing for protected classes is through the provision of alternative housing types, such as accessory dwelling units and mobile/manufactured homes. The City of Kirby allows manufactured homes by right in its R-3 Manufactured Home Dwelling District. While “accessory buildings” are discussed in the ordinance, the ordinance does not define how these buildings can be used and therefore does not explicitly prohibit their use for living quarters. However, by expressing clearly that these buildings can be used for long-term renters, the city can enable the expansion of its affordable housing supply.

**Leon Valley**

**Housing for Persons with Disabilities**

Leon Valley defines one of the more common housing types for persons with disabilities: group homes. The city defines group homes as:

“A dwelling for no more than six (6) legally unrelated, developmentally disabled persons and no more than two (2) supervisory personnel. Said persons and personnel must live as a single housekeeping unit, for the primary purpose of providing shelter in a family-like atmosphere as part of the residential community, with on-site medical treatment or therapy a secondary purpose. A group home must qualify as a family home under chapter 123 of the Texas Human Resources Code, Community Homes for Disabled Persons Locations Act.”

The ordinance is mindful of group homes in its definition of “family” - “An individual or two (2) or more persons related by blood, marriage or adoption, or a group not to exceed six (6) unrelated persons living together as a single housekeeping unit.” The city’s definition of family accommodates the number of unrelated persons with disabilities that may live together in a group home. Furthermore, the ordinance also allows group homes by right in its R-1 and R-2 single family districts, indicating that the ordinance legislates equal treatment for this protected housing type.
Reasonable Accommodations

For persons with disabilities seeking to live alone, a reasonable accommodations ordinance can help the resident(s) make alterations to their unit without acquiring an approved variance or undergoing a public hearing. Leon Valley does not currently have a reasonable accommodation ordinance. HUD strongly suggests the adoption of a reasonable accommodation ordinance to improve regulatory processes for persons seeking to make their homes more accessible.

Affordable Housing

Land use regulations which are overly restrictive may have the effect of limiting the supply of affordable housing. Area requirements for the R-1 Single Family and R-2 Two Family Districts include a minimum lot depth of 120’, although the required lot frontage is smaller in comparison (70’ in the R-1 district, 85’ in R-2 district). Large lot depths may increase land costs and reduce affordability for the construction of single-family homes.

Another way to improve access to housing for protected classes is through the provision of alternative housing types, such as accessory dwelling units and mobile/manufactured homes. The city allows manufactured homes by right in its R-5 Manufactured Home District. The city does not define accessory dwelling units, or list this use on its permitted use table. The city may choose to expand its affordable housing supply by creating accessory dwellings as a permitted use for long-term renters.

Schertz

Housing for Persons with Disabilities

Schertz defines one type of housing for persons with disabilities - group homes. Group homes are defined as: “A specialized lodging house and boarding house which provides long term supervised housing in a conventional residential setting for no more than three (3) persons who are physically or mentally handicapped, developmentally disabled or are victims of crime, and having no more than two (2) supervisory personnel in residence at the same time.” The ordinance also defines “family” as:

Two or more persons occupying a single dwelling unit where all members are related by blood, marriage or adoption. No single dwelling unit shall have more than four unrelated individuals residing therein, nor shall any "family" have, additionally, more than four unrelated individuals residing with such family. The term "family" does not include any organization or institutional group that receives federal or State funding for the care of the individual.

Under the city’s definition of “family” only four unrelated persons may live in a shared unit, while up to five unrelated persons may live in group home. The city can reconcile differences between these two definitions by allowing up to five unrelated people to live as a family unit, even in those scenarios where the residence is not operated through state or federal funding. The city’s permitted uses table indicates that group homes are allowed by right in all zoning districts, indicating that, overall, the city legislates equal treatment for this protected housing type.
Reasonable Accommodations

The City for Schertz assigns the responsibility of providing reasonable accommodations to persons with disabilities to its Building and Standards Commission. The Commission has the power to grant exceptions to the city’s fire code and building code based on the Fair Housing Amendment Act.

Affordable Housing

Schertz has 11 residential zoning district and one mixed use district. Area requirements for the city’s single-family districts allows minimum lot sizes of 9,600 square feet in the largest non-agricultural, single-family district - R-1. However, as with many other cities, lot depth is restrictive, with a minimum lot depth of 120’ in the R-1 R-2, and R-6 Single Family Residential Districts. The city allows multifamily by right in its R-4 Apartment/Multifamily Residential District. The city also allows manufactured housing in its MHS Manufactured Home Subdivision and MHP Manufactured Home Park District. Accessory dwelling units are allowed by right in all residential districts, excluding multifamily.

Live Oak

Housing for Persons with Disabilities

While Live Oak’s ordinance does not define group homes or other housing types for persons with disabilities, the ordinance defines a boarding house as “A building other than a hotel, where lodging and meals for three or more persons are provided for compensation.” Under the city’s schedule of uses, boarding houses are allowed by right in the city’s R-5 Apartment/Multifamily Residential District. Group homes are not listed as a permitted use under the city’s ordinance. The ordinance allows for the classification of new and unscheduled uses; however, this process includes a public hearing which may expose group homes to a public review that is not required for housing for persons without disabilities (i.e. boarding homes). The city can minimize the risk of disparate treatment by allowing group homes as a permitted use and by altering its definition of family to include unrelated persons living together as a unit.

Reasonable Accommodations

For persons with disabilities seeking to live alone, a reasonable accommodations ordinance can help the resident(s) make alterations to their unit without acquiring an approved variance or undergoing a public hearing. Live Oak does not currently have a reasonable accommodation ordinance. HUD strongly suggests the adoption of a reasonable accommodation ordinance to improve regulatory processes for persons seeking to make their homes more accessible.

Affordable Housing

Land use regulations which are overly restrictive may have the effect of limiting the supply of affordable housing. Area requirements for the R-1 Single Family and R-2 Two Family Districts include a minimum lot depth of 120’, although the required lot frontage is smaller in comparison (60’ in the R-1 district, 75’ in R-2 district). Large lot depths may increase land costs and reduce affordability for the construction of single-family homes.
Another way to improve access to housing for protected classes is through the provision of alternative housing types, such as accessory dwelling units and mobile/manufactured homes. Live Oak allows mobile homes by right in its R-6 Mobile Home Residential District. While the ordinance allows accessory buildings to be used for servant’s quarters, these buildings may not be rented out. The city has an opportunity to expand its affordable housing supply by allowing accessory dwellings to be rented to long-term renters.

**Universal City**

**Housing for Persons with Disabilities**

Universal City’s zoning ordinance defines at least one housing type for persons with disabilities, called “Life Care Services.” This housing type offers retirement housing for elderly and disabled individuals. However, the city’s definition of “life care services” referred to a campus-style housing development with multiple units. Of these units, 80% are required to serve persons 55 and older. This residential use does not appear to be designed to cover all persons with disabilities, specifically those who are not elderly or near elderly. The ordinance also defines “group residential housing” as “The residential occupancy of living accommodations by groups of more than five (5) persons (not defined as a family) on a weekly or longer basis. Typical uses include occupancy of fraternity or sorority houses, dormitories, residence halls, or boarding house.” This definition does not specifically address housing for persons with disabilities but may cover this protected housing type. However, both “life care services” and “group residential housing” are allowed only by specific use. Specific use permits require a public hearing before the city council, which may subject this protected housing type to public scrutiny and may limit the number or placement of this protected housing type.

**Reasonable Accommodations**

For persons with disabilities seeking to live alone, a reasonable accommodations ordinance can help the resident(s) make alterations to their unit without acquiring an approved variance or undergoing a public hearing. Universal City does not currently have a reasonable accommodation ordinance. HUD strongly suggests the adoption of a reasonable accommodation ordinance to improve regulatory processes for persons seeking to make their homes more accessible.

**Affordable Housing**

Lot design standards for Universal City tend to be permissive, with small minimum lot areas (7,500 square feet in the largest single-family district), and small front, side and rear yard setbacks. The city allows mobile homes by right in its MH2 District. Although the city also allows accessory residential uses that may be rented, these building types must be approved through the special use process, which includes a public hearing before the city council. The public hearing process may have the effect of limiting this housing type based on public preference. The city may be able to expand its affordable housing supply by allowing accessory residential units by right, utilizing common building and zoning codes to regulate for safety and appropriateness.
CHAPTER 7. PUBLICLY SUPPORTED HOUSING

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported housing programs. Government-owned and managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

Improving on public housing’s model of high-density, fixed-site dwellings for very low-income households, publicly supported housing programs have since evolved into a more multi-faceted approach overseen by local housing agencies. The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, also referred to as the Housing Choice Voucher (HCV) program, provides two types of housing vouchers to subsidize rent for low-income households: project-based and tenant-based. Project-based vouchers can be applied to fixed housing units in scattered site locations while tenant-based vouchers allow recipients the opportunity to find and help pay for available rental housing on the private market.

The Tax Reform Act of 1986 created the Low-Income Housing Tax Credit (LIHTC) program to incentivize development of affordable, rental-housing development. Funds are distributed to state housing finance agencies that award tax credits to qualified projects to subsidize development costs. Other HUD Programs including Section 811 and Section 202 also provide funding to develop multifamily rental housing specifically for disabled and elderly populations.

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the lessons learned from HOPE VI. The scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.38

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing developments and residents utilizing housing vouchers to continue to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this

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clustering and recent years have seen many states revising their allocation formulas to discourage this pattern in new developments. The reasons for clustering of HCVs is more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering. This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution within Bexar County.

## Supply and Occupancy

Residents of Bexar County (outside of San Antonio) receive publicly supported housing through the Housing Authority of Bexar County or HABC. The HABC offers housing choice vouchers (HCVs) to local residents, having disposed of its remaining public housing developments in 2020. According to its most recent PHA plan, the HABC has 1,743 vouchers in use and accommodates several voucher types, including HUD VASH and the Mainstream Program. The HABC also owns three apartment communities located in the City of San Antonio.

The HUD LIHTC database also indicates that there are approximately 1,311 LIHTC units in the county outside of San Antonio. However, the database indicates that only 932 LIHTC remain set aside for low-income households. Combined, publicly supported housing units make up figures represented by HUD make up an estimated 2.1% of the housing units in Bexar County’s service area. In the region (which includes San Antonio), publicly supported housing makes up 5.3% of all housing units.

### Table 14. Publicly Supported Housing Units by Program Category

<table>
<thead>
<tr>
<th>Housing Units</th>
<th>Bexar County (HABC only)</th>
<th>San Antonio-New Braunfels MSA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Total housing units</td>
<td>145,005</td>
<td>892,770</td>
</tr>
<tr>
<td>Public housing</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>HCV program</td>
<td>1,743</td>
<td>12%</td>
</tr>
<tr>
<td>LIHTC program</td>
<td>1,311</td>
<td>0.9%</td>
</tr>
</tbody>
</table>

**Source:** Decennial Census; 2020 HABC 5-Year PHA Plan; 2020 APSH; HUD User LIHTC Database

Table 15 shows the racial and ethnic composition of publicly supported housing units, as well as estimates for the numbers of low-to-moderate income households in the county’s service area.

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Data provided in the table portrays how closely the publicly supported housing residency rate of several racial and ethnic groups compares to their share of the general population. Estimates for public housing have been excluded from the figures below due to the HABC’s disposal of its remaining public housing units in 2020.

In Bexar County, Hispanic households make up the largest share of low-income households. Approximately 45% of all very low-income households, 46% of low-income households, and 47% of moderate-income households are Hispanic. The percentage of low-to-moderate income Hispanic households in the county’s service area exceeds their share of the population (38%). Overall, Hispanic households also make up the largest shares of publicly supported housing residents. Around 46% of other multifamily housing, such as senior housing and housing for persons with disabilities, houses Hispanic families — a figure equal to their share of low-to-moderate households. However, Hispanic households are slightly overrepresented in project-based Section 8 housing (52% of all households) and housing choice vouchers (54% of voucher holders).

While White households make up the largest share of households in the county’s service area (approximately 48%), they make up only the second largest group of low-to-moderate income households. Forty-one percent of the county’s very low-income households are white, while 39% are low income or moderate income. Across all publicly supported housing types, White households are underrepresented, with the largest percentages found in Project-based Section 8 units (35%) and other types of multifamily housing (34%). Only 9% of all HCV holders are white.

Black households in the county comprise similar shares of the population (around 10%) and the county’s low-to-moderate income households (9-11%). Black households are only 7% of the county’s project-based Section 8 residents. However, Black households are slightly overrepresented in other multifamily housing (1%) and significantly overrepresented in the housing choice voucher program (30% of all voucher holders). Asian and Pacific Islander households too have similar shares in the general population (2%) and all low-to-moderate income households (2-3%). APSH data indicates that Asian and Pacific Islander households are underrepresented in the HCV program (1%) and in project-based Section 8 housing (2%). However, these households are slightly overrepresented in other multifamily housing types (4%).

At the regional level, Hispanic households make up a greater share of the population (48%), however, the share of low-to-moderate income Hispanic households also increases (59-60%). Hispanic households make up over 60% of all public supported housing types and up to 74% of the region’s public housing residents. Although the share of Black households decreases in the region (7%), between 8-9% of the region’s low-to-moderate income households are Black. Furthermore, Black households are overrepresented in all publicly supported housing types, comprising 9% of the region’s other multifamily housing, 14% of public housing and project-based Section 8 housing, and 23% of the region’s HCV households.

Conversely, there are significantly fewer low-to-moderate income White households in the region (27-30%) compared to their share of the general population (42%). White households also make up significantly smaller shares of publicly supported housing in the region: 11% of public housing households, 12% of HCV households, 16% of project-based Section 8 and 19% of
other multifamily. The share of Asian and Pacific Islander low-to-moderate income households also decreases at the regional level (2%), although their share of the general population remains nearly the same as in Bexar County. Asian and Pacific Islander households also make up smaller shares of the region’s HCV households (>0.1%), with slight overrepresentation in other multifamily housing (3%) and project-based Section 8 housing (4%).

Table 15. Publicly Supported Housing Residents by Race/Ethnicity

<table>
<thead>
<tr>
<th>Housing Type</th>
<th>Race/Ethnicity</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>White</td>
<td>Black</td>
<td>Hispanic</td>
<td>Asian or Pacific Islander</td>
<td></td>
</tr>
<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>#</td>
</tr>
<tr>
<td>Bexar County</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td>61</td>
<td>34.6%</td>
<td>12</td>
<td>6.6%</td>
<td>91</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td>76</td>
<td>34.3%</td>
<td>24</td>
<td>11.1%</td>
<td>111</td>
</tr>
<tr>
<td>HCV Program</td>
<td>169</td>
<td>8.6%</td>
<td>592</td>
<td>30.1%</td>
<td>1060</td>
</tr>
<tr>
<td>0-30% AMI</td>
<td>3,800</td>
<td>40.8%</td>
<td>850</td>
<td>9.1%</td>
<td>4,210</td>
</tr>
<tr>
<td>0-50% AMI</td>
<td>7,755</td>
<td>38.7%</td>
<td>1970</td>
<td>9.8%</td>
<td>9,250</td>
</tr>
<tr>
<td>0-80% AMI</td>
<td>14,810</td>
<td>39.1%</td>
<td>3,635</td>
<td>9.6%</td>
<td>17,665</td>
</tr>
<tr>
<td>Total Households</td>
<td>64,635</td>
<td>48.3%</td>
<td>12,705</td>
<td>9.5%</td>
<td>50,085</td>
</tr>
<tr>
<td>San Antonio-New Braunfels MSA</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Housing</td>
<td>713</td>
<td>10.6%</td>
<td>967</td>
<td>14.4%</td>
<td>4,971</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td>719</td>
<td>15.7%</td>
<td>639</td>
<td>14.0%</td>
<td>2,841</td>
</tr>
<tr>
<td>Other Family</td>
<td>229</td>
<td>18.6%</td>
<td>107</td>
<td>8.7%</td>
<td>819</td>
</tr>
<tr>
<td>HCV Program</td>
<td>2,040</td>
<td>12.0%</td>
<td>3,934</td>
<td>23.2%</td>
<td>10,978</td>
</tr>
<tr>
<td>0-30% AMI</td>
<td>26,613</td>
<td>27.0%</td>
<td>9,280</td>
<td>9.4%</td>
<td>59,050</td>
</tr>
<tr>
<td>0-50% AMI</td>
<td>51,703</td>
<td>27.5%</td>
<td>15,816</td>
<td>8.4%</td>
<td>114,205</td>
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<tr>
<td>0-80% AMI</td>
<td>95,523</td>
<td>29.7%</td>
<td>25,555</td>
<td>7.9%</td>
<td>189,745</td>
</tr>
<tr>
<td>Total Households</td>
<td>332,710</td>
<td>41.8%</td>
<td>54,795</td>
<td>6.9%</td>
<td>377,760</td>
</tr>
</tbody>
</table>

Note: Data presented are number of households, not individuals.
Source: Decennial Census; CHAS, Tables 1 and 9; APSH
Geography of Supported Housing

In the map that follows, the locations of publicly supported housing developments within the Bexar County service area are represented along with the levels of Housing Choice Voucher use, which is indicated by gray shading. The map below does not indicate public housing units owned or managed by the San Antonio Housing Authority.

The purple markers on the map indicate the location of low-income housing tax credit (LIHTC) properties provided to HUD’s LIHTC database. LIHTC units show clustering in the western half of the county north of Highway 90. Located within a three-mile radius, the Paso Fino Apartments, Eagle’s Rest Apartments and Vista Pointe at Wild Pine Apartments are in unincorporated Bexar County west of the Anderson Loop. Further south is the Westcreek Townhomes, located on the Anderson Loop, and the Medio Springs Ranch Apartments (an HABC development) near S. Ellison Drive. These LIHTC developments are in unincorporated areas immediately adjacent to the San Antonio city limit. Five cities outside of San Antonio also have LIHTC units – Balcones Heights, Converse, Leon Valley, Somerset, and Universal City. LIHTC developments in these cities are located near major roads, such as the Villas of Leon Valley located along Bandera Road; the Balcones Lofts near Fredericksburg Road; the Town Square Apartments near Peterson Blvd in Converse; Somerset’s Casitas de Merced just south of the Anderson Loop; and the Arbor at Centerbrook located near I-35 in Universal City. LIHTC developments are sited in census tracts with a greater number of Hispanic residents than residents of any other racial or ethnic group. Census tract 1217.02 in Universal City is the outlier, containing a larger White population than any other racial or ethnic group.

The blue marker indicates the location of senior housing created through HUD’s Section 202 program. The Christian Village Apartments, located in Leon Valley, are located on Wurzbach Road near the intersection of I-410 and Bandera Road. The census tract which houses the Christian Village Apartments (tract 135.06) is approximately 63% Hispanic, 24% White, 7% Black, and 5% Asian.

The green markers on the map indicate the location of housing developed through the former Section 811 program serving persons with disabilities. Two sites remain which were formed through the 811 program: Oak Forest Heights on Toepperwein Road in Live Oak and Wagon Crossing on Kitty Hawk Road in Universal City. These two sites are located approximately one mile apart in eastern Bexar County, with direct access to I-35 and the Anderson Loop. Tract 125.01 which contains Oak Forest Heights, has a slightly larger white population (39%) compared to its Hispanic and Black populations (34% and 16% respectively). Tract 126.04, containing Wagon Crossing, sits east of tract 125.01 and has slightly more Hispanic residents (38%), with large shares of White (35%) and Black residents (19%).

The number of Housing Choice Vouchers (HCVs) in use per census tract is represented by the shading on the map below. HCVs are issued to households and may be used at a rental unit of the tenant’s choosing to reduce the tenant’s share of rent payments to an affordable level. Therefore, unlike the publicly supported developments marked on the map, HCVs are portable and their distribution throughout the city is subject to fluctuate based on location preferences of individual voucher households and the participation of landlords in the HCV program. Data
from the Picture of Subsidized Housing indicates that the greatest number of housing choice vouchers can be found in Census tract 1519, located partially in San Antonio and part in unincorporated south Bexar County along Roosevelt Avenue. Here, APSH estimates that 182 housing choice vouchers are in use. The population in tract 1519 is nearly 87% Hispanic. Voucher use is also high in Tract 1316.08 in Converse adjacent to Randolph Air Force Base (120 vouchers), Tract 1817.05 in south Leon Valley (120 vouchers) and Tract 1612 located in south Bexar County along I-35 south of the Anderson Loop (110 vouchers). All three tracts have a predominately Hispanic population, ranging from 39% Hispanic in Tract 1316.08 (Converse) to 87% Hispanic in Tract 1612 (south county).

As the map indicates, publicly supported housing developments are primarily located adjacent to the City of San Antonio’s city limits. Furthermore, these developments are concentrated in the east and west of the city. There are no publicly supported developments in cities such as Alamo Heights, Castle Hills, Helotes, Hollywood Park, Hill Country Village, Shavano Park or Von Ormy. The county also lacks public supported housing developments in the north and southeast of the county.
Figure 38. Publicly Supported Housing and Race / Ethnicity in Bexar County
Policy Review

The Housing Authority of Bexar County (HABC) is required by HUD to fulfill the Five-Year PHA Plans with annual plan updates as required by HUD for non-qualified PHAs. The HABC maintains an Administrative Plan to set policy for who may be housed by the housing authority and how those tenant households are selected. Four aspects of the Admin Plan are examined here: tenant selection, local preference, tenant screening, and subsidy standards. The following review will also describe the HABC’s reasonable accommodation policy. These policy types allow local determination by the HABC and are among the most central to matters of fair housing choice.

The HABC begins its tenant selection for the HCV program by determining eligibility for the program. Applicants are considered eligible for a housing choice voucher if they meet the following criteria:

- Family status
  - Family includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:
    1. A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or
    2. A group of persons residing together, and such group includes, but is not limited to:
      - A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
      - An elderly family;
      - A near-elderly family;
      - A disabled family;
      - A displaced family;
      - The remaining member of a tenant family; and
      - The head of household is at least 18 years of age or an emancipated minor under Texas state law.\(^{41}\)
- Meeting income requirements (at or below HUD’s income limits based on family size).
- Submission of all required documentation.
- Passing a Criminal Background Check
- Citizenship or Eligible Immigration Status.
- Compliance with HABC program requirements.
- Possessing no debts owed to a PHA
- No violation of any HCV family obligation in the past 5 years.

Housing choice voucher applicants complete a pre-application to be placed on the HABC waiting list. The HABC also uses a local preference system to sort incoming applications. Applicants receive 100 point toward their application if they reside or work in Bexar County. Lesser point values are granted to applicants if they are homeless and referred to the HABC by

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\(^{41}\)HABC. (July 1, 2020). “Housing Choice Voucher Program Section 8 Administrative Plan.” p. 6-1
agencies such as SARAH or Haven for Hope (80 points); if they have been displaced from
current HABC housing and are in good standing/victims of domestic violence (70 points); or, if
they are an elderly or disabled family (50 points).

The HABC maintains one electronic waiting list for all housing choice voucher applicants.
Applicants are placed on the waiting list based on the number of points received during the
application process. Where two residents have the same number of points, the two applicants
are then sorted by the date and time of their application. Therefore, the HABC places more
weight on residency than family type, which may help to accommodate the large number of
families already living in the county who need affordable housing.

Tenant screening is conducted by the landlord, not the HABC. In its Admin Plan, the HABC states
that it is not liable for tenant behavior or suitability for the unit. However, the HABC will deny
applicants based on the following standards required by HUD: currently engaging in illegal use
of a drug; subject to a lifetime registration requirement under a State sex offender registration
program; conviction of drug-related criminal activity for manufacture of methamphetamine on
the premises of federally assisted housing; or alcohol abuse which would interfere with the
health, safety or right to peaceful enjoyment of the premises by other residents.\footnote{42} The HABC
may also deny admission to applicants evicted from federally assisted housing for drug related
criminal activity for three years following the date of eviction. However, the Admin Plan notes
that persons who have successfully complete rehabilitation or for whom the circumstances
leading to the eviction have changed can have this factor waived.

When vouchers are available, the HABC mails a full application to applicants on the waiting list.
At the time of formal application, HABC staff verify the local preferences identified in the
application. All adult members of the household must attend an interview and must sign the full
application. Once the HABC confirms the applicants’ eligibility and verifies all documentation,
the applicant is invited to a program briefing to learn about the HCV program and receive their
voucher.

The HABC also maintains a Reasonable Accommodation policy in the Admin Plan, which allows
an applicant or resident with a disability to request a change to one of the HABC’s policies or
procedures to accommodate a disability. Examples of accommodations might include allowing
applications to be completed by mail, increasing payment standards to help a person with a
disability find a suitable home, or extending time for voucher holders to find an accessible unit.
Individuals wishing to obtain reasonable accommodations must provide documentation from a
licensed medical professional. The HABC makes a decision on providing the accommodation
within 10 business days.

\footnote{42} https://www.hud.gov/sites/documents/DOC_10760.PDF
CHAPTER 8. HOUSING FOR PEOPLE WITH DISABILITIES

An estimated 12.7% of the U.S. population had a disability as of the American Community Survey Five-Year Estimates for 2015-2019. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation’s housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.43

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. Unique housing requirements for people with an ambulatory difficulty may include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible. For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships, as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move.

Modifications and assisted living arrangements tend to pose significant costs for people with disabilities, who already experience more difficulty affording housing compared to populations with no disability. Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities.44

In Bexar County (excluding the city of San Antonio), an estimated 52,456 people have a disability, representing 12.1% of the total population. Seniors (age 65 or older) have the highest disability rate at 36.1%. In contrast, the rate for those aged 18 to 64 is 11.2%, and just 5.9% of children under age 18 have a disability. These rates are lower than those of the region, where 14.0% of residents have a disability, including 39.2% of seniors and 6.9% of youth.

Ambulatory disabilities are the most common type in both the county and the region, affecting 6.1% of county residents and 7.1% of the region’s population. Cognitive, independent living, and hearing disabilities are the next most common disabilities, impacting approximately 3% to 5% of

the population in both geographies. Vision and self-care difficulties are the two least common disability types, each affecting about 3% or fewer of the county’s and region’s residents.

**Table 16. Disability by Type**

<table>
<thead>
<tr>
<th>Disability Type</th>
<th>Bexar County</th>
<th></th>
<th>San Antonio-New Braunfels MSA</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Hearing difficulty</td>
<td>15,832</td>
<td>3.7%</td>
<td>96,132</td>
<td>4.0%</td>
</tr>
<tr>
<td>Vision difficulty</td>
<td>9,206</td>
<td>2.1%</td>
<td>81,096</td>
<td>3.3%</td>
</tr>
<tr>
<td>Cognitive difficulty</td>
<td>20,160</td>
<td>4.7%</td>
<td>131,442</td>
<td>5.4%</td>
</tr>
<tr>
<td>Ambulatory difficulty</td>
<td>26,187</td>
<td>6.1%</td>
<td>17,151</td>
<td>7.1%</td>
</tr>
<tr>
<td>Self-care difficulty</td>
<td>9,598</td>
<td>2.2%</td>
<td>65,187</td>
<td>2.7%</td>
</tr>
<tr>
<td>Independent living difficulty</td>
<td>15,016</td>
<td>3.7%</td>
<td>112,095</td>
<td>4.6%</td>
</tr>
</tbody>
</table>

**Note:** All % represent a share of the total population within the jurisdiction or region.

**Source:** 2014-2018 5-Year American Community Survey, Tables B18102 to B18107

**Table 17. Disability by Age Group**

<table>
<thead>
<tr>
<th>Age of People with Disabilities</th>
<th>Bexar County</th>
<th></th>
<th>San Antonio-New Braunfels MSA</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Age 5-17 with disabilities</td>
<td>5,424</td>
<td>5.9%</td>
<td>31,423</td>
<td>6.9%</td>
</tr>
<tr>
<td>Age 18-64 with disabilities</td>
<td>28,892</td>
<td>11.2%</td>
<td>186,824</td>
<td>12.5%</td>
</tr>
<tr>
<td>Age 65+ with disabilities</td>
<td>17,805</td>
<td>36.1%</td>
<td>121,032</td>
<td>39.2%</td>
</tr>
</tbody>
</table>

**Note:** All % represent a share of the total population within the jurisdiction or region within each age group.

**Source:** 2014-2018 5-Year American Community Survey, Table B18101

**Accessible Housing Supply and Affordability**

Any new multifamily housing with five or more units constructed after 1988 using federal subsidies must include a minimum of 5% of units accessible to persons with mobility impairments and an additional 2% of units accessible to persons with vision/hearing impairments (or one unit of each type, whichever is greater). Additionally, HUD provides support for accessible housing through its Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs.

A search for affordable elderly and special needs housing using HUD’s Resource Locator tool was conducted to identify affordable rental properties in Bexar County designed to serve people with disabilities. The search returned two results located in Bexar County outside of the city of San Antonio: Oak Forest Heights in the city of Live Oak has 24 one- and two-bedroom units,
and Wagon Crossing in Universal City has 20 one- and two-bedroom units. Both properties provide these units through the Section 811 Supportive Housing for Persons with Disabilities program.

A similar point-in-time search of the Directory of Accessible Housing—a directory of accessible rental housing in San Antonio and Bexar County developed by the Fair Housing Council of Greater San Antonio in partnership with Making Housing Accessible—for affordable apartments with accessibility features in Bexar County returned four results. Accessible units were listed at Casitas de Merced (Somerset), Elm Hollow Apartments (Helotes), Oak Forest Heights (Live Oak), and Wagon Crossing Apartments (Universal City). Monthly rents for units with rents listed ranged from $285 to $950 for one- to two-bedroom units. Oak Forest Heights and Wagon Crossing Apartments provide rental subsidies through HUD so that qualifying residents pay 30% of their income in rent. All properties were noted as offering accessible features for people using wheelchairs, and two properties (Oak Forest Heights and Wagon Crossing Apartments) offer accessibility features for people with hearing impairments.

Based on a standard Supplemental Security Income (SSI) payment of $794 per month (equating to an affordable rent of $238 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing is often a key source of accessible and affordable housing for people with disabilities. As described in Chapter 7, there are 1,761 Housing Choice Vouchers in Bexar County and no public housing units (the County ended its public housing program in 2020). The share of residents with a disability in various types of publicly subsidized housing in Bexar County and the San Antonio region are shown below. In both the county and region, the share of residents with a disability living in Housing Choice Voucher units (29.1% and 29.3%, respectively) is much greater than the share of the population with a disability (12.1% in the county and 14.0% in the region). Project-based Section 8 units housed people with disabilities at a slightly higher rate than their share of the population. Data on the disability status of Section 202 and 811 households was not available.

Table 18. Disability by Publicly Supported Housing Program Category

<table>
<thead>
<tr>
<th>Housing Type</th>
<th>Share of Residents with a Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Bexar County</td>
</tr>
<tr>
<td>Public Housing</td>
<td>N/A</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td>15.6%</td>
</tr>
<tr>
<td>Section 811 Housing</td>
<td>N/A</td>
</tr>
<tr>
<td>Section 202 Housing</td>
<td>N/A</td>
</tr>
<tr>
<td>HCV Program</td>
<td>29.3%</td>
</tr>
</tbody>
</table>

Source: Inventory Management System (IMS)/ PIH Information Center (PIC), 2019; Tenant Rental Assistance Certification System (TRACS), 2019; Low Income Housing Tax Credit (LIHTC) database, 2017 (AFFH data, July 2020)
The outsized shares of public housing and HCV households with people with disabilities suggests that these programs are a significant component of the area’s supply of affordable and accessible housing. The lack of accessible units available in the private rental market and the high utilization of publicly supported programs for affordable and accessible units demonstrate that the need for accessible housing options in Bexar County is not met by the current supply.

Stakeholders who participated in this planning process also noted a need to increase housing options for people with disabilities, emphasizing that housing with supportive services for people with intellectual and developmental disabilities and affordable housing near public transportation are top needs. Further, 57.5% of the respondents to the public survey conducted as part of this analysis indicated that the lack of housing options available for people with disabilities poses a barrier to fair housing, and 45.8% noted a high level of need for housing for people with disabilities.

**Zoning and Accessibility**

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes, in conjunction with comprehensive plans. Bexar County does not utilize a zoning code. However, the county issues building permits and bears responsibility for the inspection of such units. The county utilizes the 2015 International Building Code, which HUD identifies as one of several editions of the standard building code that is considered “safe harbors” under the Fair Housing Act, promoting the health, safety, and welfare of the public through building construction.45

**Definition of “Family” and Group Housing for People with Disabilities**

This study has examined zoning ordinances for several cities in Bexar County, exploring their ordinances related to protected housing types serving people with disabilities. Zoning ordinances for Alamo Heights, Converse, Helotes, Kirby, Leon Valley, Live Oak, Schertz, and Universal City were explored in Chapter 5 of this study.

Group homes or other congregate living environments are allowed by right in single family residential districts in Leon Valley and Schertz. However, many Bexar County cities either fail to define these housing types or list them as permitted uses in the ordinance. This oversight may be permissible when the city’s definition of “family” is broad enough to include unrelated individuals sharing a residential unit. The City of Helotes, for example, does not define protected housing types for persons with disabilities but its definition of “family” allows for the follow household: “a collective number of individuals domiciled together in one dwelling unit whose relationship is of a continuing non-transient domestic character and who are cooking and living as a single nonprofit housekeeping unit.” However, in those cases where protected housing types are not defined and the definition of “family” severely limits the number of unrelated

people that can live together, the ordinance imposes disparate regulations on housing for persons with disabilities that is not present for persons without disabilities.

Cities throughout Bexar County can identify opportunities to remove regulatory barriers for these protected housing types, given the limited supply for housing for people with disabilities throughout the county. By defining these housing types and allowing them by right in single family districts, these jurisdictions can help expand the supply of accessible housing that is integrated into neighborhoods, located near amenities, and offers diverse living environments (both urban and suburban).

**Reasonable Accommodations**

Adopting a reasonable accommodation ordinance is one specific way to address land use regulations’ impact on housing for persons with disabilities. Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices, and procedures or even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities, or “to afford persons with a disability the equal opportunity to use and enjoy a dwelling.” (The requirements for reasonable accommodation under the Americans with Disabilities Act (ADA) are the same as those under the FHA. 42 U.S.C. 12131(2).) However, the FHA does not set forth a specific process that must be used to request, review, and decide a reasonable accommodation. The cities of Alamo Heights, Converse, Helotes, Kirby, Leon Valley, Live Oak and Universal City have not yet adopted clear and objective processes by which persons with disabilities may request a reasonable accommodation/modification to zoning, land use, and other regulatory requirements. The City of Schertz is one exception; although the city does not outline a specific reasonable accommodations process in its zoning ordinance, the ordinance grants authority to its Building and Standards Commission to make exceptions to the fire and building code based on the Fair Housing Amendment Act. All Bexar County cities are encouraged to adopt a reasonable accommodation ordinance that lay out a process for acquiring accommodations as part of their zoning or nondiscrimination ordinances.

Model ordinances are available that have been approved by HUD or the DOJ as part of fair housing settlement or conciliation agreements. These model ordinances include a standardized process so that there is transparency and equality in how requests are treated, and gives the director of planning or zoning administrator, or her designee, the authority to grant or deny reasonable accommodation requests without the applicant having to submit to a public hearing process.
CHAPTER 9. FAIR HOUSING ACTIVITIES

Fair Housing Lawsuits and Litigation

Below is a summary of the nature, extent, and disposition of significant housing discrimination lawsuits filed and/or adjudicated between January 2015 and January 2021 involving or affecting parties and local governments within Bexar County, and which may impact fair housing choice within the study area. The cases chosen for discussion may be broken up into five main fair housing issues: (1) discrimination based on disability for failure to design and construct multifamily dwellings that are accessible and usable to persons with disabilities; (2) discrimination based on disability in age-restricted, senior living communities; (3) discrimination based on disability for an alleged failure to provide a reasonable accommodation in zoning/land use case; (4) discrimination based on familial status; and (5) discriminatory advertising in targeted advertising/marketing.

The Texas Fair Housing Act, Tex. Prop. Code Ann. § 301 et seq., has been deemed substantially equivalent to the federal Fair Housing Amendments Act (FHA), with parallel provisions regarding rights, procedures, remedies, and judicial review and enforcement. Courts generally do not give the two statutes different treatment when adjudicating discrimination complaints brought under both the state and federal laws. The cases discussed below were all filed in federal district court, seeking parallel remedies under one or both acts.

Issue 1: Discrimination Based on Disability for Failure to Design and Construct Accessible Multifamily Dwellings

Under the FHA, discrimination in housing against persons with disabilities includes a failure “to design and construct” covered multifamily dwellings so that they are accessible to and usable by persons with disabilities, in particular for people who rely on wheelchairs or mobility devices. Developers, builders, owners, and architects responsible for the design or construction of newly constructed multifamily developments of or more units (intended for first occupancy after March 13, 1991) may be liable if properties fail to meet certain design features: an accessible entrance on an accessible route; accessible common and public use areas; doors sufficiently wide to accommodate wheelchairs; accessible routes into and through each dwelling; light switches, electrical outlets, and thermostats in accessible locations; reinforcements in bathroom walls to accommodate grab bar installations; and usable kitchens and bathrooms configured so that a wheelchair can maneuver throughout the space.

In a series of cases filed in 2018 and 2019 against developers and owners of San Antonio area multifamily housing complexes, Plaintiff Dana Bowman—an individual with physical handicaps and advocate for veterans with disabilities—alleged that while searching for new housing, he visited the subject properties and observed accessibility barriers that would interfere with his ability to access and use the dwellings and related facilities in violation of the FHA.

The complaint cited violations of the FHA’s design and construction requirements at the Aviator at Brooks Apartments, a 162-unit multifamily housing complex in San Antonio, including accessible routes to and through public and common use areas, accessible routes to first floor units, accessible thresholds, accessible and usable features such as thermostats and environmental controls, clear maneuvering space in kitchens and bathrooms, among others.


This complaint alleged the 128-unit Military Village Apartments in San Antonio lacked accessible routes to public sidewalks, roads, or public transportation; lacked accessible routes between buildings and to common amenities and spaces; lacked accessible routes to some first floor units; had excessive slopes along some accessible routes; failed to provide accessible enclosed garage spaces; lacked appropriate clearance in doorways to some units; failed to provide usable/accessible door hardware; lacked accessible thermostats in some units; and had inadequate clear floor space in unit bathrooms and kitchens.

• Bowman v. Valencia Lofts, LLC, Civil Action No. 5:19-cv-0170 (W.D. Tex.) (filed Feb. 21, 2019; settlement and stipulation of dismissal April 12, 2019).

This complaint alleged the 192-unit Valencia Lofts Apartments in San Antonio lacked accessible routes to public sidewalks, roads, or public transportation; lacked accessible routes between buildings and to common amenities and spaces; lacked proper clearance space at gates; lacked appropriate clearance in doorways to some units; failed to provide usable/accessible door hardware; lacked accessible thermostats in some units; and had inadequate clear floor space in unit bathrooms and kitchens.

• Bowman v. TIGRIS XIV, Ltd., 5:19-cv-00207 (W.D. Tex.) (filed March 1, 2019; settlement and stipulation of dismissal April 22, 2019).

The violations allegedly observed at the 202-unit Arroyo Seco Villas in San Antonio included lack of accessible routes between buildings and facilities/amenities; routes with excessive slopes; inaccessible ground floor units; excessively high entrance thresholds; lack of proper clearance at gates; inaccessible thermostats in some units; and inadequate clear floor space in unit bathrooms and kitchens.

In each case, the plaintiff’s complaint sought to require the defendants to bring the subject property into compliance with the ADA and FHA so that persons with disabilities could have equal access to housing, and sought monetary damages. Defendants denied liability and asserted as an affirmative defense that Plaintiff’s claims were barred because the subject property was found by the City of San Antonio when issuing occupancy and building permits to comply with its own building code, which incorporates the accessibility requirements in the 2012 Texas Accessibility Standards. Each case was settled before adjudication on the merits of
the claims under undisclosed settlement agreements and the parties stipulated to a voluntary
dismissal of their respective lawsuits.

**Issue 2: Discrimination Based on Disability in Age-Restricted,
Senior Living Communities**

While the FHA generally prohibits housing providers from excluding families with children under
18, some senior housing facilities may be designated as Housing for Older Persons (55 years of
age+) and exempted from FHA liability for familial status discrimination. The Housing for Older
Persons Act of 1995 (HOPA) allows exempted developments to restrict housing to persons
meeting the age requirement. The “housing for older persons” exemption does not, however,
protect senior housing developments from liability for housing discrimination based on
disability, race, color, religion, sex, and national origin or for those classes protected by a state
or local law.

The Fair Housing Council of Greater San Antonio (FHCGSA), a HUD FHAP grantee serving 35
counties in south Texas including Bexar County, noticed an increase in the number of disability
discrimination complaints it was receiving concerning independent living senior housing
communities. The FHCGSA organized a testing audit of various senior independent living
facilities in the surrounding San Antonio area. Tests were designed to detect whether the
independent living facilities were discriminating in the leasing application process against
prospective tenants based on their perceived disabilities.

Qualified housing for older persons should have no prerequisite criteria other than age-
restriction and income requirements. Except in limited circumstances such as housing
specifically designated for persons with handicaps, HUD regulations prohibit housing providers
from making “an inquiry to determine whether an applicant for a dwelling, a person intending to
reside in that dwelling after it is so sold, rented or made available, or any person associated with
that person, has a handicap or to make inquiry as to the nature or severity of a handicap of such
a person.” 24 C.F.R. 100.202(c). Therefore, in cases where testing revealed discrimination based
on disability, administrative complaints were then filed with the Civil Rights Division of the Texas
Workforce Commission (TWC), the state’s FHAP enforcement agency, and/or a civil lawsuit was
filed seeking injunctive relief, monetary damages, and nondiscriminatory policy changes against
offending housing providers.

- **Fair Housing Council of Greater San Antonio v. One Towers Park Lane Cooperative Co.,
Civil Action No. 5:15-cv-01052 (W.D. Tex.) (filed Dec. 1, 2015; settlement and dismissal
Aug. 17, 2017).**

The FHCGSA filed this action against the 353-unit senior independent living retirement
community located in San Antonio after testing revealed the facility was discriminating against
prospective tenants with disabilities who otherwise met the age and income qualifications. The
defendants’ application process and policies required each prospective resident to submit a
detailed medical assessment performed by a physician, along with a statement from the
physician that the prospective resident meets a certain standard of health. Additionally, to be
permitted to use a motorized ambulation device, residents were required to register their
devices, obtain liability insurance, and provide a physician’s authorization for the device. Use of
motorized ambulation devices was restricted and, at times, prohibited in the common dining areas. Defendants also prohibited full-time, live-in aides for residents who required some assistance with daily tasks. The fair housing advocacy organization argued that these practices and policies discouraged and prevented people with disabilities from residing in the housing of their choice.

The complaint noted that in 2015, the Civil Rights Division of the Texas Workforce Commission, which investigates housing discrimination complaints under the Texas Fair Housing Act, found reasonable cause to conclude that Defendants’ policies and practices constitute discrimination in violation of the fair housing law.

Without admitting liability under federal or state fair housing laws, the Defendants made an offer of judgment to settle the claims for $95,000. Upon further settlement negotiations, the parties reached an undisclosed agreement and voluntarily dismissed the lawsuit prior to adjudication on the merits.


The FHCGSA brought this lawsuit against the owner and operator of the Adante apartment complex in San Antonio, a property for seniors 55 years and older consisting mostly of independent living apartments and cottages, with the remaining housing consisting of assisted living and memory care apartments. FHCGSA alleged that the senior housing provider maintained several policies that violate specific provisions of the federal and Texas fair housing laws against disability discrimination including requiring prospective residents to provide detailed information about their medical conditions and their use of aids such as hearing aids or glasses; requiring residents to relocate if they need regular nursing services or have certain mobility impairments; limiting the use of motorized ambulation devices in the dining areas of the complex; and requiring residents using such devices to obtain liability insurance. Plaintiff argued that these intrusions and policies could cause otherwise-qualified seniors to be rejected from housing, transferred to different housing, or evicted because of their disability.

Following court directed mediation, the parties reached an undisclosed settlement and filed a voluntary dismissal of the claims.


The Patriot Heights apartment complex in San Antonio, with 130 independent living units for seniors, was included in FHCGSA’s testing audit of senior living communities. FHC alleged that the defendants conditioned tenancy on prospective residents’ ability to provide documentation of a medical assessment performed by his or her physician, along with an approval from the physician that the prospective resident meets a certain standard of health. The rental application requests detailed information about the medical and health status of the applicant, medications, assistive devices, disabilities, etc. and explicitly stated that a prospective tenant may be rejected where the community determines in its discretion that the applicant is or may become “unable
FHCGSA filed an administrative complaint with the Texas Workforce Commission, which issued a Charge of Discrimination against defendants but was unable to reach a conciliation agreement. The parties reached an undisclosed agreement and voluntarily dismissed the lawsuit prior to adjudication on the merits.


After its testing audit and a concurring Charge of Discrimination by the Texas Workforce Commission against The Forum at Lincoln Heights, a senior apartment community with approximately 150 age-restricted independent living units in San Antonio, the FHCGSA filed this federal fair housing lawsuit for defendants’ continued unlawful practices. The defendants required prospective residents to provide documentation of a medical assessment performed by his or her physician, along with an approval from the physician that the prospective resident meets a certain standard of health, which FHCGSA alleged was discrimination in the terms, conditions, or privileges of rental of a dwelling because of disability and had the purpose and effect of discriminating in the rental of, or otherwise making unavailable or denying, housing because of disability. The parties reached an undisclosed agreement and voluntarily dismissed the lawsuit prior to adjudication on the merits.


In this case, the FHCGSA allegedly found that the defendants maintained policies at the 160+ unit The Inn at Los Patios in San Antonio that discriminated against and denied housing to persons with disabilities, specifically by requiring prospective residents to provide detailed information about their medical conditions and conditioning eligibility to rent on the prospective residents’ medical proof of their ability to live independently. Prior to initiating this federal lawsuit, the TWC issued a Charge of Discrimination against Defendants for engaging in discriminatory housing practices on the basis of disability. FHCGSA and the TWC were unable to resolve the claims with Defendants through the administrative conciliation process. The parties reached an undisclosed settlement in this case and stipulated to a dismissal of all claims.

- **Fair Housing Council of Greater San Antonio v. Franklin Companies, Civil Action No. 5:15-cv-1060 (W.D. Tex.)** (filed Dec. 2, 2015; consent agreement and dismissal June 16, 2016).

The FHCGSA filed this action against the owners and operators of Franklin Park Sonterra, a 150-unit apartment complex for seniors 55+ in San Antonio after testing revealed the complex required prospective tenants to provide detailed information about personal medical information, restricted the use of mobilized ambulation devises such as mobility scooters, and required residents using such devices to obtain liability insurance. The Texas Workforce Commission investigated and charged defendants with violating the Texas Fair Housing Act on the basis of disability. After the lawsuit was filed, the parties engaged in settlement negotiations and agreed to the terms of a Consent Order to settle and release the claims.
Under the Consent Order, defendants agreed to pay $50,000 in damages to the FHCGSA. Defendants further agreed to adopt policy changes in their rental agreements and resident handbooks to no longer make disclosure of medical histories mandatory, to allow motorized ambulation devices without separate liability insurance, to allow service animals and home health services, and to include a reasonable accommodation provision. Defendants also agreed to provide comprehensive training on fair housing laws for all employees who perform managerial or admissions-related duties.

- **Fair Housing Council of Greater San Antonio v. KSL Texas Communities SA, LLC, Civil Action No. 5:17-cv-00017 (W.D. Tex.) (filed Jan. 8, 2016; settlement and dismissal March 31, 2017).**

Through testing, the FHCGSA alleged that the 190-unit Villa de San Antonio engaged in discriminatory conduct on the basis of disability by among other actions, requiring as a condition for renting that prospective residents provide detailed information about their medical conditions and obtain a physician’s assessment of their physical and mental health. The housing provider’s policies also required residents to obtain a permit for the use of motorized carts on the property. The TWC had previously issued a Charge of Discrimination against defendants for engaging in discriminatory housing but was unable to reach a conciliation deal. The parties reached an undisclosed agreement and voluntarily dismissed the lawsuit prior to adjudication on the merits.

**Issue 3: Discrimination Based on Disability for an Alleged Failure to Provide a Reasonable Accommodation in Zoning/Land Use Case**

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. Local definitions of “family” that limit the number of unrelated persons who may reside in single-family neighborhoods may be subject to FHA liability. The Supreme Court has distinguished between local occupancy standards that “cap the total number of occupants [of a dwelling] in order to prevent overcrowding” and are exempted from FHA scrutiny by Section 3607(b)(1) as opposed to local “family composition rules typically tied to land-use restrictions” which not exempt from the FHA’s reasonable accommodation requirement. Local governments have an affirmative obligation to provide reasonable accommodations to land use or zoning policies when such accommodations may be necessary to allow persons with disabilities to have an equal opportunity to use and enjoy housing.

- **Saint v. City of Shavano Park, Civil Action No. 5:16-cv-00796 (W.D Tex.) (filed Aug. 9, 2016; dismissed following the City's Motion for Summary Judgment Sept. 26, 2018).**

In Shavano Park, the city’s definition of “family” limited the number of unrelated persons who may reside together to up to two unrelated persons while theoretically permitting an unlimited number of persons related by blood or marriage. However, the zoning code permitted up to six persons with disabilities and two supervisors to reside in a community home in a single-family zoning district in line with the number permitted to reside in a Community Home for Disabled Persons as defined by the Texas Human Resources Code. Plaintiffs operated an assisted living
facility in a single-family residential zoning district in Shavano Park and obtained a license from the state to house up to six residents but sought to provide housing for more and argued the licensing requirements and the city’s limitation on number of residents with disabilities was discriminatory. Plaintiffs sued Shavano Park seeking a declaration that the zoning and occupancy restrictions violate the FHA; injunctive relief prohibiting the city from restricting the number of patients they may care for in their home; and an award of monetary damages.

The City filed a Motion for Summary Judgment seeking to have the lawsuit dismissed. The district court found as a matter of law that the zoning and occupancy restrictions for single-family residential areas do not fall within the exclusion from FHA scrutiny for municipal “restrictions regarding the maximum number of occupants permitted to occupy a dwelling.” Having met this threshold question, the court turned its analysis to whether Plaintiffs had proved that the City’s zoning and land use ordinances then violated the FHA’s prohibitions against discrimination based on disability. It concluded that Plaintiffs failed to provide any evidence that permitting six but not more disabled residents from living together in an area zoned for single family use deprived disabled residents of the equal use and enjoyment of housing or the ability to compete equally with non-disabled persons in the housing market, nor any evidence that the City refused to make a reasonable accommodation. The court granted Defendant’s motion and dismissed the case.

**Issue 4: Discrimination Based on Familial Status**

The FHA, with limited exceptions for designated housing for older persons, prohibits discrimination in housing against families with children under 18. Familial status discrimination includes both an outright denial of housing to families with children and imposing special requirements or conditions on tenants with children that are not imposed on other tenants without children. For example, multifamily complexes may not segregate families with children to a single portion of the complex, place an unreasonable restriction on the total number of persons who may reside in a dwelling, or limit access to recreational services or common facilities provided to other tenants.

- **Padgett v. Texas Regional Asset Management, LLC.**, Civil Action No. 5:18-cv-00396 (W.D. Tex.) (filed May 2, 2018; settled and dismissed July 1, 2019).

Former residents of two multifamily apartment complexes and the nonprofit housing advocacy organization Fair Housing Council of Greater San Antonio (FHCGSA) brought a fair housing lawsuit against the owners and operators of the Gates of Capernum Apartments in San Antonio and multiple apartment complexes in Hidalgo County, alleging violations of the FHA on the basis of familial status. Specifically, plaintiffs alleged that families with children were threatened with eviction and fines by defendants for violating rules prohibiting households with children—but not other households—from being outdoors, even within their rental units, after 8:00 p.m. and prohibiting children from being outdoors or in common areas without the immediate physical supervision of a blood relative. In denying a motion to dismiss filed by defendants, the court found that plaintiffs’ factual pleadings that defendants conditioned tenancies upon compliance with policies that denied families with children equal access to and enjoyment of their rental units supported a cognizable claim under the FHA’s protection against discrimination “in the terms, conditions, or privileges of sale or rental of a dwelling.” Without admitting to liability,
defendants then settled the action in an undisclosed settlement agreement and the parties filed a stipulation of dismissal of the lawsuit.

• **Castilleja v. Main Street Properties, LLC.** Civil Action No. 5:17-cv-0378 (W.D. Tex.) (filed April 28, 2017; settlement and dismissal March 28, 2018).

This action stemmed from the denial of rental housing to a single mother of four children for a home in San Antonio. At the time of filing, defendants owned and/or managed approximately 200 rental properties in Texas including the single-family property plaintiff sought to rent. Upon initial inquiry, the rental agent informed Ms. Castilleja that the subject property was available, but after learning that plaintiff would also have her four children living with her, the agent asserted that the house was no longer available and refused to make available or offer as an alternative any of the other many properties on the market that defendants owned or managed in the area. When alerted to the alleged discriminatory conduct, the FHCGSA performed “matched-pair” testing of some of defendants’ advertised rental properties, and confirmed that testers with children were denied housing that was then offered to prospective renters without children. Plaintiffs filed an administrative complaint with the Texas Workforce Commission, who completed their own investigation and found reasonable cause to believe defendants engaged in discriminatory housing practices based on familial status. Following the court’s denial of defendants’ Motion to Dismiss, the parties reached an undisclosed settlement, and the federal lawsuit was dismissed.

### Issue 5: Discriminatory Advertising in Targeted Housing Advertising

The Fair Housing Act prohibits the making, printing, and publishing of advertisements that indicate a preference, limitation, or discrimination because of race, color, religion, sex, disability, familial status, or national origin. The prohibition applies to publishers of ads as well as to the persons/entities who place the advertisements. It also applies where the advertisement itself violates the Act, even if the property being advertised may be exempt from FHA scrutiny. The prohibition against discriminatory advertising also includes excluding protected classes from receiving the advertisement, i.e. targeted ads that distribute advertisements that exclude a certain audience on the basis of any protected characteristic.

• **National Fair Housing Alliance v. Facebook, Inc.,** Civil Action No. 1:18-cv-02689 (S.D. NY) (filed March 27, 2018; court approved settlement agreement and dismissal March 29, 2019).

The National Fair Housing Alliance and three of its member nonprofit fair housing advocacy organizations—Fair Housing Council of Greater San Antonio, Fair Housing Justice Center of New York, and Housing Opportunities Project for Excellence of Miami—filed a lawsuit against Facebook alleging that the social media platform enabled third-party advertisers of housing to discriminate on the basis of race, sex, national origin, disability, and familial status through the use of Facebook created audience selection tools and filters. Plaintiffs investigated and tested Facebook’s advertising platforms in the San Antonio, New York, Miami, and Washington D.C. housing markets and found that Facebook’s technology classifies users based upon protected characteristics and pretexts for protected characteristics and then allows housing advertisers...
to prevent, through inclusion and exclusion selection tools, certain users from ever seeing certain ads for housing based upon those protected characteristics. Plaintiffs alleged that Facebook’s technology and data collection enabled the making and targeting of these ads, and then Facebook affirmatively approved these ads and were paid for publishing and promoting these ads to targeted audiences at the exclusion of other protected groups of users.

The Department of Justice, having enforcement interest in federal fair housing cases, filed a Statement of Interest supporting Plaintiffs’ cause of action and briefing the court with an analysis of why Facebook was not immune from a housing discrimination lawsuit under the Communications Decency Act.

Facebook denied liability and sought to have the lawsuit dismissed or in the alternative moved to California. However, before a ruling on the merits of the claims, the Parties reached a settlement. Under the court-approved Settlement Agreement, Facebook agreed to modify its audience selection tools to no longer allow targeting by zip code, and when targeting by city/town or address/pin drop to include a 15-mile radius (to address concerns related to perpetuating racial segregation); no longer allow targeting by age or gender; and not allow targeting options determined to be direct descriptors of, or semantically or conceptually related to, a person or group of people based on a protected class (e.g. persons interested in English as second language or persons interested in disability groups). On or before December 31, 2019, Facebook was required to make available an interface that allows users to search and view current housing advertisements by advertiser or by location targeting options chosen by the advertiser, regardless of whether those users are in the audience selected by those advertisers. Facebook would now implement features alerting advertisers that engaging in unlawful discrimination is prohibited by Facebook’s policies and applicable federal and state anti-discrimination laws and educate advertising users on those policies and law. Further, Facebook agreed to develop and administer training on civil rights laws related to housing advertisements approved by NFHA to certain employee groups; pay $1950,000 to Plaintiffs for damages and expenses; provide $500,000 to Plaintiffs in advertising credit to promote educational programs and services in fair housing on the platform; and permit Plaintiffs to place test ads for the purpose of monitoring implementation of the settlement agreement. Fair housing advocates viewed these changes to advertising standards in the tech and social media industry impacted by this case as historic and far reaching because of the millions of Facebook users and billions in advertising dollars affected.
CHAPTER 10. IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors are provided in
Table 19, along with implementation timeframes and responsible parties.

**Impediment #1: Low Labor Market Engagement and Limited Incomes Restrict Housing Choice and Access to Opportunity Among Protected Classes**

Disparities in labor market engagement exist by geography, race, and ethnicity in Bexar County. Residents of parts of north and north-central Bexar County tend to have the highest levels of educational attainment and the lowest levels of unemployment, while those living in parts of south and south-central Bexar County tend to have the lowest levels of educational attainment and experience unemployment at the highest rates. Median household incomes are highest in north Bexar County and lowest in parts of central and south Bexar County, where they fall below $40,000 in seven census tracts. Among racial and ethnic groups, residents who identify as some other race alone, Native American, or Hispanic have the lowest rates of educational attainment (16.2%, 23.3%, and 23.9% have bachelor’s degrees or higher, respectively), and Native American and Black residents experience the highest rates of unemployment (9.8% and 6.6% are unemployed, respectively). Low levels of labor market engagement drive down wages, thus restricting housing choice and access to opportunity.

Place-based strategies allow for the targeting of resources and outreach efforts to areas with high proportions of residents whose housing choices may be limited by low earnings or unemployment. These strategies can be combined with other approaches focused on closing skills gaps and developing career pathways, increasing job creation and quality standards, and raising the wage floor. Examples of place-based strategies to increase labor market engagement include increasing awareness of high-growth jobs that pay family-sustaining wages and connections to the training necessary to obtain them, and targeting neighborhoods with high proportions of low-earning workers as priorities for interventions that increase awareness of available subsidies and resources.46

Planning efforts underway in the county and region provide recommendations for increasing labor market engagement and earnings in Bexar County. The Alamo Area Council of Governments Comprehensive Economic Development Strategy (2018-2023) details several opportunities to increase labor market engagement through workforce development, including coordinating with regional education and workforce development agencies to better align regional curricula to meet employer needs; supporting the region’s human capital development by accessing resources for a well-prepared, skilled professional and technical workforce; supporting programs that develop entrepreneurial skills in the workforce; and encouraging incentive programs that will foster entrepreneurship and small business development. Efforts to address these and other workforce development goals at the county level—such as through the County’s Strong Workforce Program, Skills Development Program, and other workforce and economic development programs—can be targeted to areas of the county with lower levels of labor market engagement. These efforts are vital to improving labor market engagement among protected classes and thus to increasing housing choice and economic mobility in Bexar County.

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Impediment #2: Continued Need for Neighborhood Investment in Areas with High Poverty Rates and Low Levels of Access to Resources and Services

Low levels of access to resources and services in areas with higher levels of poverty—combined with moderate levels of segregation by race, ethnicity, and income—also create barriers to access to opportunity in Bexar County. The need for neighborhood investment is particularly acute in parts of south, central, and east Bexar County, areas of the county with the highest poverty rates and lowest levels of access to resources, such as parks, fresh food retailers, and healthcare services. Data from the American Community Survey, local plans and studies, the community survey conducted as part of this planning process, community input from meetings and stakeholder interviews, and other sources indicates that residents of south, central, and east Bexar County tend to have lower levels of access to high-quality neighborhood facilities, resources, and services:

- Few parks exist in most of south, southeast, and southwest Bexar County outside of the city of San Antonio. Stakeholders emphasized a high level of need for parks and recreation facilities and improvements, noting that significant variation exists between lower- and upper-income areas regarding the quality of parks, available amenities, and maintenance. When asked whether certain resources and opportunities are equally available in all neighborhoods, 57.1% of survey respondents said parks and trails are not equally available across the county.

- Disparities in access to fresh food exist across the county. In eight census tracts in south Bexar County—including tracts in and around Von Ormy, Somerset, Sandy Oaks, and Elmendorf—more than 50% of residents have low incomes and live more than ½ mile from a supermarket. In 16 additional tracts in south and east Bexar County, between 40% and 50% of residents meet the USDA definition of low income and low access at ½ mile. Much of south Bexar County is served primarily by dollar stores or smaller food outlets, indicating that many residents need may access to vehicles to access one of the area’s larger supermarkets. 58.3% of survey respondents said that grocery stores and other shopping are not equally available across the county.

- School districts in the county that have greater shares of economically disadvantaged students tend to receive lower district ratings, indicating disparities in school district performance by socioeconomic status. These districts tend to also have lower proportions of white students, indicating high levels of segregation by district and disparities in access to the highest performing schools by race and ethnicity. Stakeholders interviewed during this planning process emphasized a need to increase internet access for youth, to expand youth education programming, and to connect school districts with funding to address and prevent homelessness.

- The Bexar County and Atascosa County Community Health Needs Assessment notes that primary care physicians in Bexar County tend to be clustered in the medical center, downtown, and Brooks areas of the city of San Antonio, while the east and westside of the county stand out as lacking primary care availability. Residents in central, south, and
east Bexar County tend to be uninsured at the highest rates in the region (25.3% to 39.1% uninsured residents in 16 census tracts).

Together, these measures indicate that a lack of access to high-quality neighborhood facilities, resources, and services in areas of the county restrict access to fair housing choice by limiting opportunity for residents. To address disparities in neighborhood resources and associated lack of access to opportunity, meeting attendees and stakeholders interviewed during this planning process emphasized the need for continued investment in neighborhood services, facilities, and infrastructure, particularly in south, central, and east Bexar County.

**Impediment #3: Housing Options for Persons with Disabilities are Limited**

Stakeholders identify a need for additional housing for persons with disabilities, including elderly populations with disabilities. Approximately 12% of Bexar County’s population has a disability, of which more than one-third (36%) are aged 65 and older. The county has four sites serving persons with disabilities located in Somerset, Helotes, Live Oak and Universal City. However, in several cities throughout the county, local zoning ordinances can restrict the placement of future housing developments for persons with disabilities. Many smaller cities in the county do not allow housing types for persons with disabilities by right (e.g. group homes, congregate living). Many jurisdictions also do not have reasonable accommodation ordinances, which may have the effect of adding regulatory barriers to improving housing accessibility.

In addition to limited housing supply serving this population, limited planning for non-physical disabilities, particularly mental illnesses, can also affect their ability to remain stably housed. Stakeholders indicate that one barrier to housing is that SSI checks do not always arrive in time for recipients to pay their rent on time, which has implications for the stability of residents’ housing. Landlords and management companies can help to improve housing stability by offering extended rent deadlines for persons receiving SSI or SSDI. Persons with SPMI may also benefit from trauma-informed design, such as having no corners and located in quiet areas to reduce stress.

**Impediment #4: Limited Supply of Affordable Housing Disproportionately Impacts Persons of Color/Protected Classes**

Affordable housing is the county’s greatest housing need, according to participants in the public engagement process. Stakeholders note that market-rate new construction is not affordable for many families to purchase. Low-to moderate income households turn to renting, particularly housing offered through LIHTC, the Housing Authority of Bexar County (HABC) and other non-profit programs. While many residents choose to live outside of San Antonio to be near their support networks, the limited supply of affordable housing across all areas of the county forces members of protected classes to live in areas with fewer amenities and less access to affordable transportation.

Looking at housing that serves low-to-moderate income households, the county’s LIHTC units tend to be located primarily along 1604 on the far west side of the county, on the east side of the county in Universal City and Converse, and in Somerset (south). Leon Valley and Balcones
Heights each have one LIHTC site as well. There are no LIHTC sites in north Bexar County and very limited options in the south part of the county as well. The HABC offers low-income housing through its housing choice voucher program. Unfortunately, many households fall out of the low-income guidelines based on their family size. HABC staff note that of 200 voucher applicants, only 32 were able to be offered vouchers because they did not meet the low-income limits. Income limitations on publicly supported housing indicate a greater need for LIHTC units throughout the county.

Looking further at the county’s housing choice voucher program, most vouchers are offered in the south, west, and east areas of the county, as well as in cities such as Leon Valley and Balcones Heights. Voucher holders, who are predominantly Hispanic, have limited access to housing in the northeast and northwest parts of the county. While the cost of living tends to be higher in these areas and may lack public transportation, northeast and northwest Bexar County are perceived to be safer than other areas and have more activities for families. A lack of housing opportunities in these desired areas limits housing choice for these residents.
## Table 19. Fair Housing Goals and Activities

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<tr>
<th>Contributing Factors</th>
<th>Recommended Activities, Goals, and Timeframes</th>
<th>Responsible Parties and Partners</th>
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<tbody>
<tr>
<td>Impediment #1: Low Labor Market Engagement and Limited Incomes Restrict Housing Choice and Access to Opportunity Among Protected Classes</td>
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<td>Bexar County</td>
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| Disparities in labor market engagement by geography, race, and ethnicity | • Continue to collaborate with key stakeholders with the goal of implementing workforce development strategies contained in the Alamo Area Council of Governments Comprehensive Economic Development Strategy (2018-2023), including:  
  - Coordinate with regional education and workforce development agencies to better align regional curricula to meet employer needs  
  - Support the region’s human capital development by accessing resources for a well-prepared, skilled professional and technical workforce  
  - Support programs that develop entrepreneurial skills in the workforce  
  - Encourage incentive programs that will foster entrepreneurship and small business development  
  Marketing for workforce development programs should be targeted to areas of the county with the lowest levels of educational attainment and labor force participation and the highest levels of unemployment (Ongoing, 2021).  
• Continue and expand upon the Strong Workforce Program to provide workforce training assistance, connections to jobs, and workforce experience opportunities. Conduct targeted marketing of the program in areas of the county with the lowest levels of educational attainment and labor force participation and the highest levels of unemployment (Ongoing, 2021).  
• Continue and expand upon the Skills Development Program to provide tailored training for current and new employees in skills required for targeted industries. Support resident and employer awareness of and participation in the program, with a particular focus on areas of the county with the lowest levels of educational attainment and labor force participation and high levels of unemployment (Ongoing, 2021).  
• Continue efforts to integrate K-12 systems, higher education institutions, major employers, the San Antonio Economic Development Foundation, and other key stakeholders to ensure educational programs meet employer needs for high-demand jobs that pay living wages. Develop and expand upon workforce development programs to address any gaps in current programming, as the County did in supporting the development of the Texas Federation for Advanced Manufacturing Education and associated paid job training and education programs in advanced manufacturing (Ongoing, 2021).  
• Collaborate with residents to understand barriers to accessing existing job training programs, and develop strategies to address these barriers (Ongoing, 2021).  
• Continue to engage in and support local hiring for County contracts and through workforce training programs such as the Skills Development Program (Ongoing, 2021).  
• Fund youth-focused programming, including education, mentoring, and job training (Ongoing, 2021). |
### Table 19. Fair Housing Goals and Activities (continued)

<table>
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| **Impediment #2: Continued Need for Neighborhood Investment in Areas of the County with High Poverty Rates and Low Levels of Access to Resources and Services** | • Using CDBG or other funding, fund projects that develop, expand, or improve community centers and programming, healthcare facilities and services, and other public facilities, infrastructure, and services in low- and moderate-income census tracts, including in south, central, and east Bexar County (Ongoing, 2021). | • Bexar County  
• Nonprofit community partners                                                                                                                                   |
| Continued need for neighborhood reinvestment in south, central, and east Bexar County |                                                                                                                                                                                                                                              | • Bexar County  
• Nonprofit community partners                                                                                                                                   |
| Lack of access to fresh food retailers, particularly in south and east Bexar County | • Using CDBG or other funding, fund projects that increase access to fresh food in low- and moderate-income census tracts, particularly in south and east Bexar County (Ongoing, 2021). | • Bexar County  
• Nonprofit community partners  
• Fresh food retailers                                                                                                                                      |
| Geographic disparities regarding school performance, and high levels of segregation by race, ethnicity, and income by school district | • Partner with school districts, local nonprofit organizations, and other partners to provide resources and services to students in lower-performing schools, particularly in south and central Bexar County. These may include basic school resources and supplies, school readiness, mentoring and tutoring, family engagement and literacy, health services, behavioral and social supports, enrichment programs, programs to increase food security and access, support for ESL students and students with disabilities, resources for students experiencing homelessness, and other resources and services (Ongoing, 2021). | • Bexar County  
• School districts  
• Nonprofit community partners and other partners                                                                                                               |
| Need to further engage low- and moderate-income communities in planning decisions | • Expand community engagement efforts focused on community needs and priorities in low- and moderate-income census tracts, including working with residents and community groups to shape the County’s approach to community engagement. Implement targeted outreach to engage with residents to identify areas for investment (Ongoing, 2021). | • Bexar County                                                                                                                                                    |
Table 19. Fair Housing Goals and Activities (continued)

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| Limited planning for non-physical disabilities, particularly mental illnesses, can also affect their ability to remain stably housed. | • Establish annual training on the housing needs of persons with severe and persistent mental illness (SPMI), including accommodations and design needs. (Ongoing, beginning Q4, 2021)  
• In partnership with a qualified organization, offer trainings to landlords and property managers about special housing needs and accommodations required by persons with SPMI. (Ongoing, beginning Q1, 2022) | • Bexar County |
| Local zoning ordinances can restrict the placement of future housing developments for persons with disabilities. | • Provide training to local jurisdictions on the value of reasonable accommodations ordinances to both residents and staff. (Q2, 2022)  
• Encourage local jurisdictions to adopt housing for persons with disabilities as permitted uses by right and identify areas to place additional multifamily housing. (Ongoing, Q4, 2021) | • Bexar County  
• Local Jurisdictions |
| **Impediment #4: Affordable Housing Needs Disproportionately Impact Protected Classes** |  |  |
| Housing types designed to serve low-to-moderate income households are limited to specific areas in the county. | • Track the state’s OAP to identify ways to improve potential LIHTC sites. (Ongoing, Q4, 2021)  
• Provide infrastructure and service improvements in areas where LIHTC sites could be located. (Ongoing, Q4, 2021)  
• Identify more robust incentives to encourage the development of affordable housing in other areas of the county. (Ongoing, Q4, 2021) | • Bexar County |
| Voucher holders, who are predominantly Hispanic, have limited access to voucher use in the northern part of the county. | • Continue to pursue landlords in all parts of Bexar County, particularly in the northern part of the county. (Ongoing, Q4, 2021) | • HABC  
• Bexar County |