



ANALYSIS OF IMPEDIMENTS to FAIR HOUSING CHOICE

Community Development Block Grant
City of Victoria, Texas
December 2009

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INTRODUCTION

The Analysis of Impediments Summary is designed to identify and assess impediments to fair housing that were addressed the previous grant year and to assist in the process of Fair Housing Planning for the current grant year. The Analysis of Impediments is a U.S. Department of Housing and Urban Development (HUD) mandated review of impediments to fair housing choice in the public and private sector. The AI is required for the City of Victoria to receive federal housing and community development block grant funding.

According to HUD, impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.
- Any actions, omissions or decisions that 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.

As part of its goal of assuring every individual the right to safe, decent and sanitary housing, HUD requires that all grantees receiving federal funds submit a certification to affirmatively further fair housing choices. The City of Victoria currently receives Community Development Block Grant funds and has undertaken fair housing planning through the following methods:

- Conducting an analysis to identify impediments to fair housing choices within the City of Victoria;
- Taking appropriate actions to overcome the effects of any impediments identified through the analysis; and
- Maintaining records reflecting Affirmatively Furthering Fair Housing.

The City of Victoria's Fair Housing Plan is divided into five sections. Impediments are discussed under their related sections. Current programs that address the impediments are listed from the 2008-09 Consolidated Plan and Strategy (CPS) One-Year Action Plan. The following is a list of five fair housing areas discussed in the plan:

1. Community Development Activities
2. Fair Housing Activities
3. Fair Housing Complaints
4. Local Lending Practices
5. Land Use Policies

Fair Housing Act

The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender/sex, familial status and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing units sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons.

HUD has the primary authority for enforcing the Federal Fair Housing Act. HUD investigates the complaints it receives and determines if there is a “reasonable cause” to believe that discrimination occurred. If reasonable cause is established, HUD brings the complaint before an Administrative Law Judge. Parties to the action can also elect to have the trial held in a federal court (in which case the Department of Justice brings the claim on behalf of the plaintiff).

Community Development Activities

Continued Community Development Activities include; Public Infrastructure Improvements, Housing Programs, Demolition and Neighborhood Clean-up activities. Through these programs, the City of Victoria is committed to furthering community development while preserving present housing stock.

Impediment 1-A: Neighborhood Deterioration.

According to the 2000 Census, 29.2% of all housing units in Victoria were built prior to 1960. Older homes with greater repair needs tend to be concentrated in neighborhoods with lower incomes. These areas are predominately located within the central and southern sections of the city. Previously conducted windshield surveys show housing with low physical condition ratings is more prominent in the southern census block groups of the city.

These older homes and neighborhoods provide affordable housing opportunities, but they also pose several issues for residents. Older homes often require replacement or repair of major household systems such as foundation, HVAC, electrical wiring, and plumbing. These houses also tend to have higher risks of lead because of their time of construction. The aging and dilapidated housing stock poses a great need for housing rehabilitation. Many of these neighborhoods also have infrastructure needs as a result of their age. For instance, many older neighborhoods were constructed prior to the establishment of sidewalk requirements. Aging infrastructure affects the quality of life for residents in these areas.

Actions to Address Impediment:

The City of Victoria has developed projects that are revitalizing neighborhoods and preserving housing stock, while clearing unsafe structures. The programs listed below address infrastructure, housing and neighborhood deterioration in lower income neighborhoods.

Sidewalk Improvements. This activity involves constructing a sidewalk along Laurent Street, in order to better connect King/Oliver Target Neighborhood residents to nearby services and Patti Welder Junior High School.

Street Lighting Improvements. This activity involves installing 4 new street lights and 31 upgrades to existing lighting within the King/Oliver Target Neighborhood. The improvements will increase safety in the area. Street lighting projects have been completed in several Target Neighborhoods.

Demolition. This activity involves the removal of dilapidated structures from property within the Target Neighborhood. This year, six (6) structures are planned for demolition. This activity helps to improve neighborhood integrity in cases where structures are too far-gone for rehabilitation assistance or are not economically feasible to rehabilitate. These conditions alleviate a public health and safety risk to the community.

Exterior Paint Program This activity involves exterior painting assistance and of lead-based paint hazard reduction for low- and moderate-income residents in the King/Oliver Target Neighborhood. The program will combine professional lead-based paint services with community volunteers to sustain a safe and suitable living environment for residents while improving neighborhood appearance.

Target Neighborhood Program The City's Target Neighborhood Program focuses on improving housing and the overall living environment in specific low- and moderate-income areas by targeting the investment of CDBG funds through a one-year comprehensive strategy. The Program has assisted 6 different neighborhoods since it began in 1998. A central element of the Target Neighborhood Program is the empowerment of community stakeholders. This is accomplished through staff working closely with residents, businesses, churches, and community organizations in the neighborhood to determine needs, priorities, and strategies for implementation. City staff facilitates neighborhood meetings, the formation of "neighborhood watches" made up of residents, and other outreach efforts. Most importantly, the strategy is be comprehensive, focusing on improving a specific area as a whole, rather than spreading limited financial resources scarcely throughout the City.

Impediment 1-B: Inadequate Supply of Low Cost Homes.

There continues to be a low supply of housing on the market priced below \$100,000. Since 2000, the supply of low cost homes has dropped significantly. In 2000, 66.5% of homes for

sale cost \$100,000 or less. In 2008, only 34.4% of homes cost \$100,000 or less according to the Texas Real Estate Center. Victoria's median house price in 2009 was \$133,800, an increase of slightly more than 31.3% over the 2005 figure of \$101,900.

Actions to Address Impediment:

New Homebuyer Assistance. This activity assists in the creation of new affordable housing units in the city-owned and developed subdivision called Swan Crossing. This program provides up to \$5,000 for down payment and/or principal reduction for low-income homebuyers. The program provides the lot (\$15,000 value) through a five-year, deferred forgivable loan.

Home Rehabilitation Program. This activity does not provide new affordable single-family homes, but prevents housing units from being lost as viable housing stock. The program will provide twelve (12) housing units that are subject to significant deterioration and/or foregone maintenance with much needed repair. Over the history of the program 250 units have been assisted.

Land Acquisition This activity involves acquisition of land for new home construction for Habitat for Humanity. Under this program, the City may purchase vacant lots for donation to Habitat for Humanity. These lots are then used for the construction of new single family homes for Habitat families.

Mortgage Assistance Program (MAP). The goal of this program is to increase the rate of home ownership among low-income families in Victoria. This activity provides down payment and closing cost assistance for first-time homebuyers, which qualify for a home mortgage from a financial institution. During the 2008-2009 program year, seven (7) low-income, first-time homebuyers were provided up to \$1,500.00 for down payment and closing cost assistance. MAP has been successful over the past decade. However, the current economic downturn created by the national housing/ lending crisis has resulted in a much tighter credit market. Financial institutions have had difficulty qualifying low-income homebuyers under the current lending guidelines. In order to encourage program participation the maximum level of assistance was raised to \$2,500 for the 2009-2010 program year.

Impediment 1-C: Inability to Obtain Safe Rental Housing

Increased difficulty in obtaining safe rental housing is a serious barrier to housing choice for some segments of Victoria residents. Many residents find themselves blocked from traditional market rate units due to poor credit histories. A prospective renter with a criminal history is often barred from traditional market rate units and public housing units. An individual with a criminal history or poor credit faces limited housing options, and as a result, many of these individuals end renting smaller individually managed units.

Victoria has experienced several recent incidents where privately owned small apartment complexes have not been maintained to minimum housing standards. This creates a

challenge for the City as it works to bring the property up to code, maintain affordability of the units, and protect the residents. In many cases, residents are displaced until repairs can be made bringing the unit into a more livable condition. Residents must once again secure housing and may once again end up in a similar circumstance if a poor credit or criminal history limits their housing options. Substandard units may ultimately be lost through demolition or neglect, further limiting the amount of rental housing available.

Actions to Address Impediment:

The City of Victoria is actively working to strengthen the enforcement of housing code to ensure that all residents have safe and secure housing. This is a developing issue within the City and situations are being addressed on a case by case basis. Temporary housing assistance for displaced residents has been coordinated through several agencies, including the Red Cross and Mid-Coast Family Services. At this point, no preventative assistance has been identified.

Impediment 1-D: Need for Home Ownership Education.

There is a general need among first-time homebuyers for information about home purchase process. Prospective homebuyers, especially those buying their first home, need assistance to help them navigate the mortgage market. Home Ownership Education helps prospective homeowners evaluate their options and understand their responsibilities. Home Ownership Education is also useful for existing homeowners as it can provide information on home maintenance, budgeting, and other topics that will assist them in becoming successful homeowners. Prospective homeowners are in need of increased and better information about programs offered by the City and local lenders that will help them become successful homeowners.

Actions to Address Impediment:

First-time Homebuyer classes are taught by local lenders are held on an individual basis to better meet the needs of the prospective homeowners. These classes help develop relationships with local lenders and empowered those that attended with the information necessary to become homeowners. Many local lenders have programs that make homeownership possible for families that otherwise might not qualify, such as lower down payment requirements, lower interest rates and more generous qualifying ratios. Local lenders have also held workshops and set up booths at different Home Shows to promote homeownership. The City of Victoria has also periodically provides home ownership education to existing homeowners who participate in housing rehabilitation programs. Efforts should be made among local lenders and City staff to provide information in multiple languages so all prospective homeowners have access to the necessary information.

Impediment 1-F: The Need for Housing and Services for the Homeless.

Homelessness continues to be a need in the Victoria area. The 2009 Point-in-Time Homeless Count reported a homeless population of 217. In November 2009, Kidzconnection, a Victoria Independent School District program serving children and their families in transitional living situations, reported 470 children in VISD were either homeless or doubled up in overcrowded housing. This figure is a dramatic increase from a September 2009 report of 187 homeless students at the beginning of the school year. The current economic climate has raised awareness of homelessness in the community as more families are affected.

Those who are homeless need assistance in making the transition from homelessness to self-sufficiency. The shelter space that is currently available will not meet the demand if the homeless numbers continue to climb. Two programs run by Crossroads Youth and Family Services have stopped offering shelter services to area youth resulting in the loss of 19 beds. Existing homeless shelters can house approximately forty (40) men and up to eighty (80) women or women with children. These figures do not take into consideration the families that are doubled up, individuals migrating from house to house and homeless families living in motels. A major need of the homeless and those at risk of being homeless is a shelter for families. There is currently not a facility that can accommodate men, women and children, forcing families to split up for the night.

Actions to Address Impediment:

Women's Crisis Center This activity will provide funding to assist construction of a new shelter for victims of domestic violence by Mid-Coast Family Services. The new facility will have 42 adult beds, many youth beds, modern safety and security features as well as a host of other features. This new facility will increase the agency's capacity to serve this population.

Several agencies are working to assist the homeless. Currently, the Salvation Army, Perpetual Help Home, and Mid-Coast Family Services, can temporarily shelter over one hundred men women and children. Each of the referenced shelters is frequently close to capacity. The Texas Homeless Network in conjunction with the Victoria Homeless Coalition conducts an annual homeless count to better determine the actual number of homeless and their needs. A nonprofit group, Millennium Housing, sets aside ten percent of its units for the homeless free of charge for up to two years. Family Promise of Victoria, Inc. is working to provide a shelter for families through a network of local churches. Family Promise is not yet operational and is currently working to build the partnerships and funding it needs to operate.

The Development Services Staff will continue to be involved in the Victoria Area Homeless Coalition and offer help or support where possible. The Victoria Area Homeless Coalition is a collaboration of private non-profits, public agencies, churches, and others interested in issues that affect the homeless. The City participates in the Coalition by providing information, support and planning assistance to seek and obtain matching funds for specific projects. These projects serve to address the homeless needs identified in the Consolidated Plan. For example, through the city's continued involvement and support the Coalition received the prestigious Continuum of Care Grant in 2004 for \$634,000, 2005 for \$308,982, and 2006

for \$310,660. In 2007, the Homeless Coalition received \$199,179 in renewals for the first two programs funded under the 2004 grant.

The 2008 Continuum of Care Grant application was submitted on January 12, 2009 for the amount of \$287,070, with \$291,333 awarded to the Victoria area. Renewals of the Gateway Project and Homeless Management Information System (HMIS), the two programs from the 2004 grant, were included in the current funding. A 1-year continuation of HopeNet was also funded. The total amount awarded increased slightly this year to help cover rising costs.

Impediment 1-F: Insufficient Public Transportation Services and Facilities

The City of Victoria is served by Victoria Transit, a small-urban transit system. Victoria Transit is administered by the Golden Crescent Regional Planning Commission (GCRPC). Victoria Transit was implemented on January 4, 1999, providing demand response curb-to-curb services. In March 2002, Victoria Transit began a fixed route system for the City of Victoria. A survey of Victoria Transit users found that over 60% of riders use the service to access employment opportunities and shopping areas. More than 1/3 of users ride Victoria Transit to access medical services. 86% of users ride Victoria Transit two or more days a week, and 61% of passengers use Victoria Transit four or more times a week. Transit ridership has increased in past years as the system continues to grow. However, the system is limited by its small size. Riders and potential riders cite the long wait between bus service and the lack of transit stop amenities, such as benches and shelters, as major reasons for not utilizing the system.

Actions to Address Impediment:

In May 2008, the Flexible Job Access Route Service was introduced. This service is designed to provide better access to employment opportunities within the city and introduce weekend bus service. These routes also offer ADA Flex Services, which allow them to flex up to $\frac{3}{4}$ a mile off their course to better serve ADA-eligible riders.

Transit Shelters In an effort to encourage the use of public transit and enable low income residents to more easily utilize the system. This activity will provide transit shelters and benches located in the low and moderate income neighborhoods. These improvements will allow increased accessibility and availability of public transportation for residents in these areas. Additional transit shelters and amenities are being provided through American Recovery and Reinvestment Act funding.

FAIR HOUSING ACTIVITIES

The City of Victoria has a fair housing ordinance that was adopted August 6, 1984. This ordinance is intended to make it unlawful to discriminate in housing where the sale, rental or lease of the housing constitutes a business. It also makes it the policy of this city that all

persons will have an equal opportunity for housing regardless of race, color, sex, religion, national origin or ancestry.

FAIR HOUSING COMPLAINTS

There have been no fair housing complaints filed with the City of Victoria.

LOCAL LENDING PRACTICES

An Internet search of the Office of the Comptroller of Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC) was performed to determine the Community Reinvestment Act (CRA) ratings for all area lenders. Only one local lender, who is headquartered in Victoria, is required to report CRA data. First Victoria National Bank received a CRA rating of "satisfactory" on their latest report dated June 23, 2008. The evaluation was based on the year stated in the CRA report and interviews conducted by the OCC with local human service organizations.

A review of Home Mortgage Disclosure Act (HMDA) data (see Table 4-1, 4-2, & 4-3) for Victoria shows that total applications for FHA, FSA/RHA, and VA loans increased by 26.77% from 2005 to 2008. The percentage of denied FHA, FSA/RHA, and VA loan applications grew slightly from 6% in 2007 to 7.57% in 2008. Loan applications for conventional loans decreased from 2197 to 1372, a 37.55% decrease from 2005 to 2008. The percentage of denied conventional loan applications also increased from 17.11% in 2007 to 18.15% in 2008. However, this percentage is lower than the 20.71% of conventional loan applications denied in 2005. For 2008, FHA, FSA/RHA, and VA loan applications showed the highest origination rate, at over 79.48% in 2008. These loans are government insured and are subject to more stringent lending criteria, contributing to a high origination rate. 502 FHA, FSA/RHA, and VA loan applications were submitted in 2008, with 399 applications resulting in loan origination. Conventional loans showed a much lower origination rate for 2008 with 57.22%. A total of 785 out of 1372 Conventional Loan applications resulted in loan origination. This analysis also used HMDA data on home refinance loans. The number of applications for these types of loans decreased dramatically from 2303 in 2005 to 1341 in 2008. The percentage of refinance loans denied in 2008 was 35.50%, up from 33% in 2005. The origination rate for refinance loans also increased from 32.44% in 2005 to 38.48% in 2008.

An analysis of HMDA Loan Application data shows that not all races participate equally when loan applications are compared to population estimates. Three percent of all FHA, FSA/RHA, and VA loan applicants and two percent of all conventional loan applicants were Black. According to 2006-2008 American Community Survey (ACS) population estimates approximately six percent of the population is Black. The percent of Black applicants for conventional loans has slightly decreased from 3.73% in 2005 to 2.11% in 2008. Twenty-nine percent of all FHA, FSA/RHA, and VA loan applicants and twenty-two percent of all

conventional loan applicants were Hispanic or Latino. This level of participation is much lower than expected given the Hispanic or Latino comprises 44.6% of the City's total population according to the ACS data. ACS data also reports that 45.6% of the City's total population is classified as White Non-Hispanic. Although Hispanic or Latino and White Non-Hispanic comprise nearly equal percentages of the total population, participation is much greater among White Non-Hispanic prospective home buyers. White Non-Hispanic applicants accounted for fifty-four percent of all FHA, FSA/RHA, and VA applications and Sixty-four percent of all conventional loan applications.

Origination and denial rates show that all races have similar success in applying for FHA, FSA/RHA, and VA loans. The originations rates range from 79.85% to 80.82% among the three largest racial groups. Denial rates are also similar, ranging from 6.67% to 8.42%. Disparities among Black, Hispanic or Latino, and White Non-Hispanic loan applicants appear in conventional loan applications. 27.59% of Black applicants, 35.25% of Hispanic or Latino applicants, and 12.81% of White Non-Hispanic applicants were denied conventional loans in 2008. The loan origination rates for Black and Hispanic or Latino applicants were similar at 44.83% and 41.73%, respectively. White non-Hispanic applicants had a loan origination rate of 61.45% in 2008. Loans originated from Black applicants rose about five percent from 2005 to 2008, while loans originated by Hispanic or Latino and White Non-Hispanic applicants decreased slightly during the same timeframe. Denial Rates for these two groups also remained static from 2005-2008, while denial rates decreased from 42.68% in 2005 to 27.59% in 2008 for black applicants.

Denials by income level also reflected fair lending practices for 2008. The statistics revealed that 23.71% of FHA, FSA/RHA, and VA loan applications were from applicants in the median income level of seventy nine percent and below. Roughly 19% to 20% of conventional loan and refinance loan applications were from applicants in the median income level of seventy nine percent and below. Origination rates for FHA, FSA/RHA, and VA loans were fairly high for all income levels. The origination rate for applicants in median income level of seventy nine percent and below was 74.79%. The origination rate for applicants in median income level of eighty percent and above was 82.26%. However, the denial rate for applicants earning below 80% MFI was more than triple the denial rate for higher income groups. The denial rates increase and origination rates lower for all income groups applying for conventional loans or refinance loans. The table below shows a much greater divide between income levels. Under current market conditions credit is very tight, which creates a tougher loan environment for prospective homeowners. The disparities reflect the additional hardships faced by lower income prospective homeowners, who generally have lower equity than their higher income counterparts.

Total Denials/Approvals by Income and Loan Type, 2008

Income Level	Total Applications	Loans Originated	Origination Rate	Applications Denied	Denial Rate
FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS					

<80% MFI	119	89	74.79%	19	15.97%
>80%MFI	372	306	82.26%	18	4.84%
CONVENTIONAL HOME-PURCHASE LOANS					
<80% MFI	271	98	36.16%	100	36.90%
>80%MFI	1078	667	61.87%	148	13.73%
APPLICATIONS TO REFINANCE LOANS					
<80% MFI	258	74	28.68%	133	51.55%
>80%MFI	1003	401	39.98%	330	32.90%

Home Mortgage Disclosure Act (HMDA) Data, 2008, Tables 41., 4.2, & 4.3

LAND USE POLICIES

Victoria considers itself to be a development friendly community in that impediments resulting from land use policies are minimal. Victoria is one of only two larger Texas cities without a zoning ordinance. This allows for a simpler development review process that is easier for property owners and developers to navigate. In September 2008, the City's planning, code enforcement, geographic information systems, building inspection, and development engineering functions were consolidated into the Development Services Department. The department serves as a one-stop development center to better serve our customers and facilitate the development process. The Development Services Department combines into one agency those functions necessary to review, approve, and monitor development applications. The City has historically taken a conservative approach to land development regulations. While this approach has its negative consequences, it also minimizes the costs of local regulations on the development of housing.

Impediment 5-A: Minimum Lot Size Requirements.

The City requires for a minimum lot size of 6,000 square feet for single family home or manufactured homes on a private lot. Many lots in the older areas of town were developed before the Subdivision and Development Ordinance was enacted. As a result, many properties do not meet the current requirements for development. Variances must be obtained before permits are issued and housing or other structures can be placed on the property. Additionally, several areas of town were originally developed outside of the city limits and were not subject to city development regulations. These areas have since been annexed. Many of these older existing and annexed lots are unplatted, requiring owners to plat lots prior to permitting.

Actions to Address Impediment:

In 1992, the City adopted a process called "Deed Approval." Deed Approval provides an exemption from the platting requirement for lots that were created before the City adopted

subdivision regulations in 1956. This exemption applies regardless of lot size. Since the adoption of this process, one hundred sixty-seven (167) property owners have been exempted from the plat requirement, including five (5) in 2008-2009. In comparison, three (3) lot size variances were processed in 2009. The Planning Commission has expressed an interest in further streamlining the approval process for substandard lots. Staff will continue to examine other development tools that would promote infill development and address issues that restrict the development of affordable housing.

JURISDICTIONAL BACKGROUND DATA

The following section provides a brief overview of the city's demographic and economic characteristics including population, income, and employment. It provides the basis for determining the city's housing and community development needs.

Population

Between 1990 and 2000 Victoria's population grew by 10% to 60,603. According to the U.S. Census Bureau's most recent estimate, the city's population was 62,463 in 2008. After experiencing an average annual growth rate of 1% per year during the 1990s, Victoria's growth has slowed to an average rate of 0.38% in 2000 – 2008.

For purposes of developing a 2015 population projection, the Planning Staff used the 2005 Texas State Data Center Zero Migration Scenario to project growth between 2005 and 2010. The longer term projections for 2015 are based on the One-half Migration Scenario growth rates. By starting with the 2008 Census Bureau Estimate of 62,463 and applying an average annual growth rate of 0.88%, we arrived at a 2010 population estimate of 64,309 and a 2015 population projection of 67,904.

It should be remembered that population projections are predictions of future change based upon past patterns. These patterns may or may not continue and future conditions cannot be guaranteed. The objective in making these projections is to have forecasts that are as realistic as possible for planning purposes.

Household Composition

Table 2.1 illustrates the nation-wide trend towards smaller households. Of interest is the fact that household size has been larger in the county than in the state as a whole, while the household size in the city is now less than the state.

Of the 22,129 households in Victoria the majority consist of families, 71.2%. Of these households, 52.4% are married and 14.3% are female head of household. 24.5% are single persons. 36.1% of all households have children under the age of 18. Large households, defined as households having 5 or more persons, comprised 13% of all households in 2000. The 2000 Census counted a total of 2,762 households with 5 or more people in Victoria.

TABLE 2.1 PERSONS PER HOUSEHOLD FOR COUNTY OF VICTORIA, CITY OF VICTORIA, STATE OF TEXAS, AND U.S.A.

Year	Persons per HH County of Victoria	Persons per HH City of Victoria	Persons per HH State of Texas	Persons per HH USA
1950	3.50	3.30	3.40	3.37
1960	3.59	3.52	3.46	3.33
1970	3.42	3.38	3.17	3.14
1980	3.11	2.91	2.81	2.76
1990	2.99	2.78	2.73	2.63
2000	2.75	2.68	2.74	2.59

Source: U.S. Census, 1950 – 2000

Race/Ethnicity

Figure 2.1 illustrates the race/ethnic composition of Victoria County’s population in the 1990 Census and projected up to the year 2020. Historically the majority of the county’s population has been Anglo (white), but the trend lines in Figure 2.1 show that by the year 2015 there should be a higher percentage of Hispanic origin persons than Anglo persons in the county – 48.4% compared to 45.3% in 2000. Over the next ten years the percentage of Black persons in the county population should increase slightly, from 7.0% in 2000 to 8.7% in 2020. During this same time period the percentage of Anglo persons in the county population should decrease from 52.2% in 2000 to 42.1% in 2020.

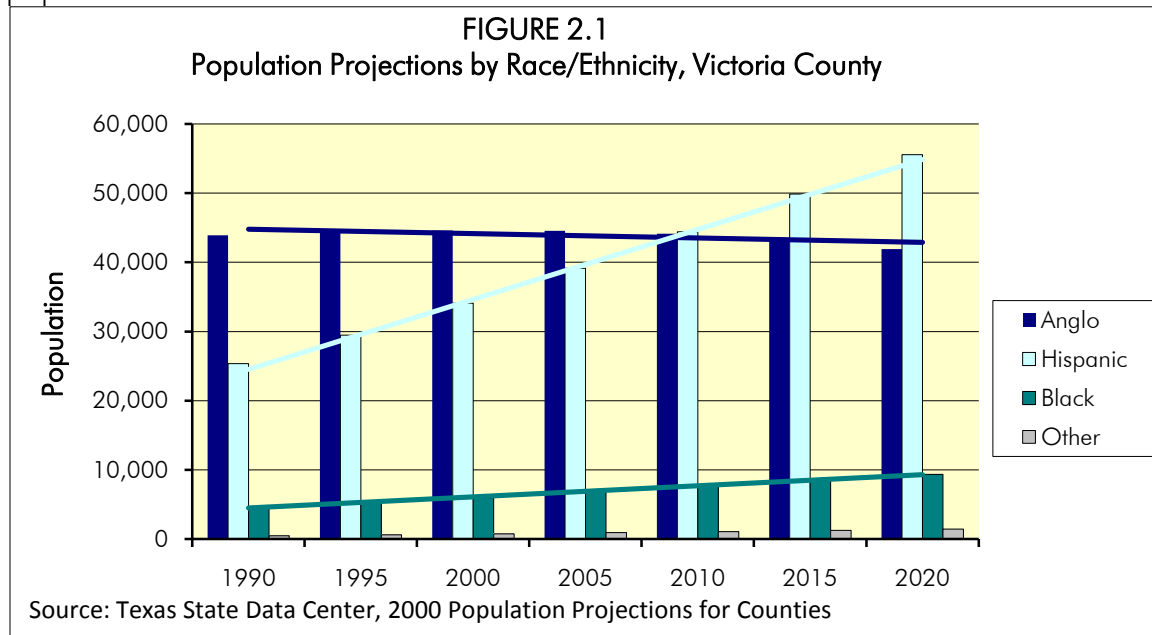
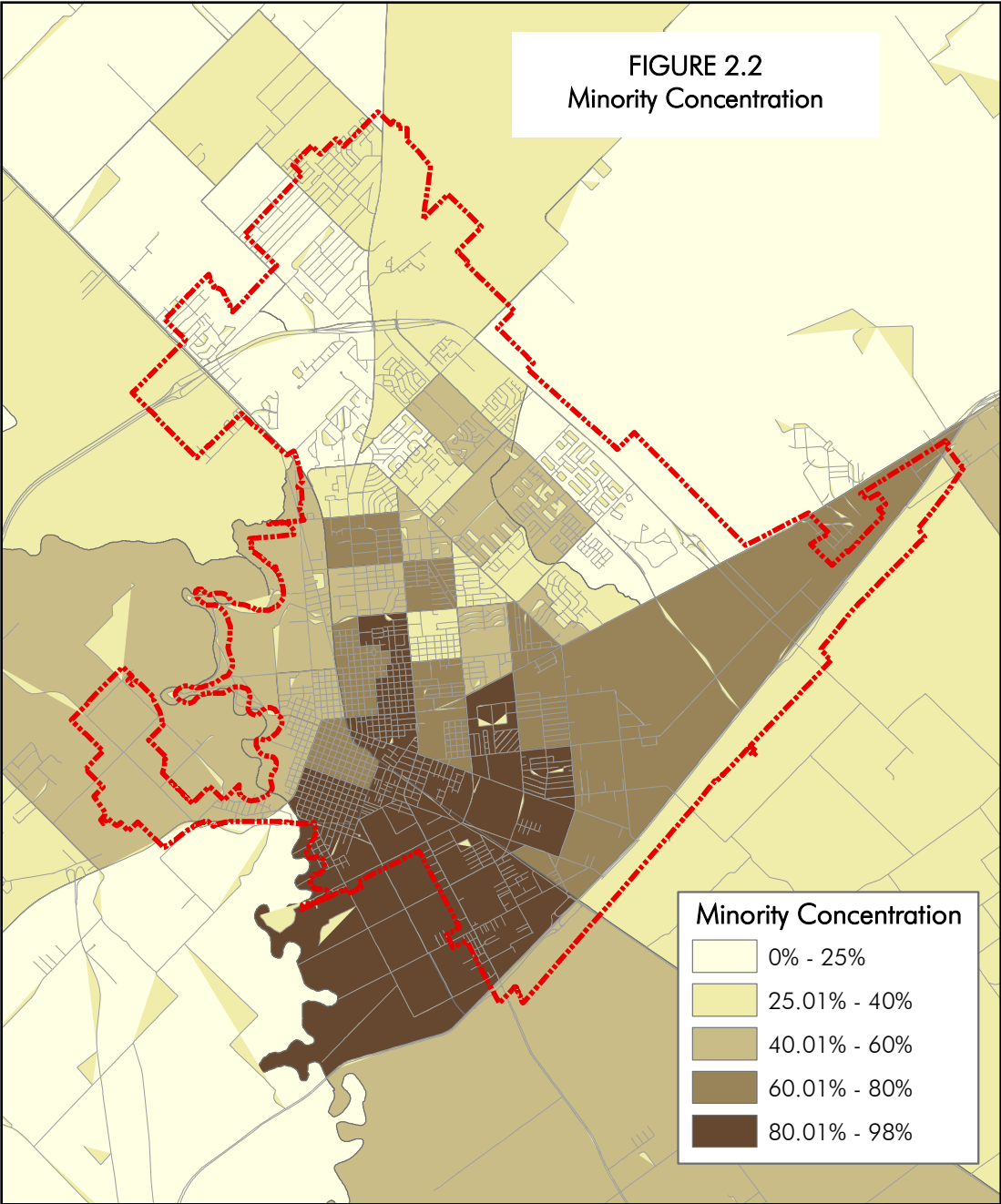
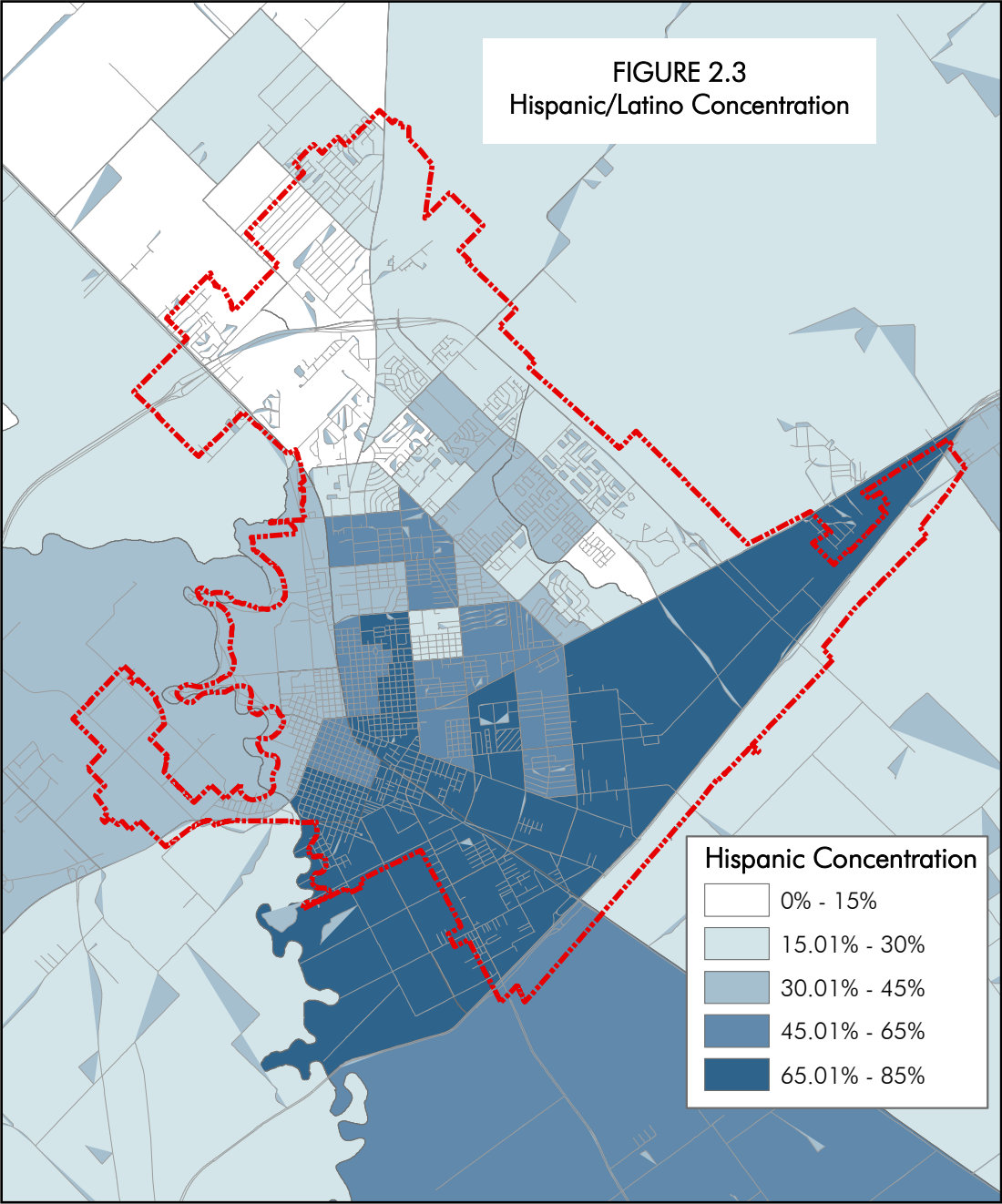


Figure 2.2 shows the concentration of all minority groups within the city.



Source: U.S. Census, 2000

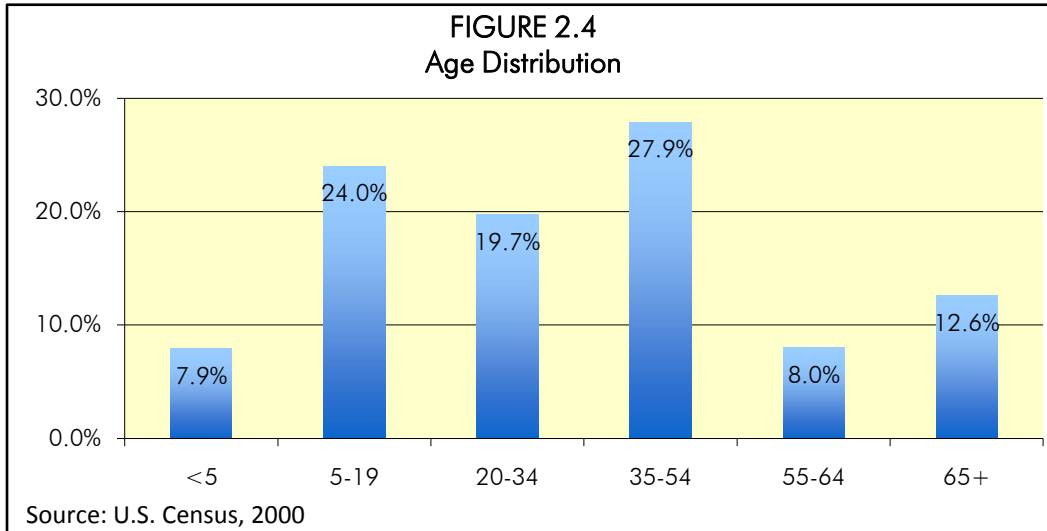
Figure 2.3 displays the distribution of the Hispanic/ Latino population according to the 2000 Census.



Source: U.S. Census, 2000

Age Distribution

The age distribution of the city from the 2000 Census is displayed in Figure 2.4. The median age of residents increased from 31 in 1990 to 34 in 2000. Seniors (persons age 65 and over) made up 12.6% of the city's population, slightly more than in 1990.



Income

Table 2.2 shows the number of moderate-, low-, and very-low income households in Victoria. There are 25,710 persons that are considered low to moderate income, 42.4% of the population, and potentially eligible for many of the programs covered through this plan. The 2000 median family income was \$42,866 with over 2,000 families earning less than \$15,000 a year. The 2009 Median Family Income (MFI) has increased to \$53,700.

TABLE 2.2 NUMBER OF LOW-INCOME HOUSEHOLDS IN 2000

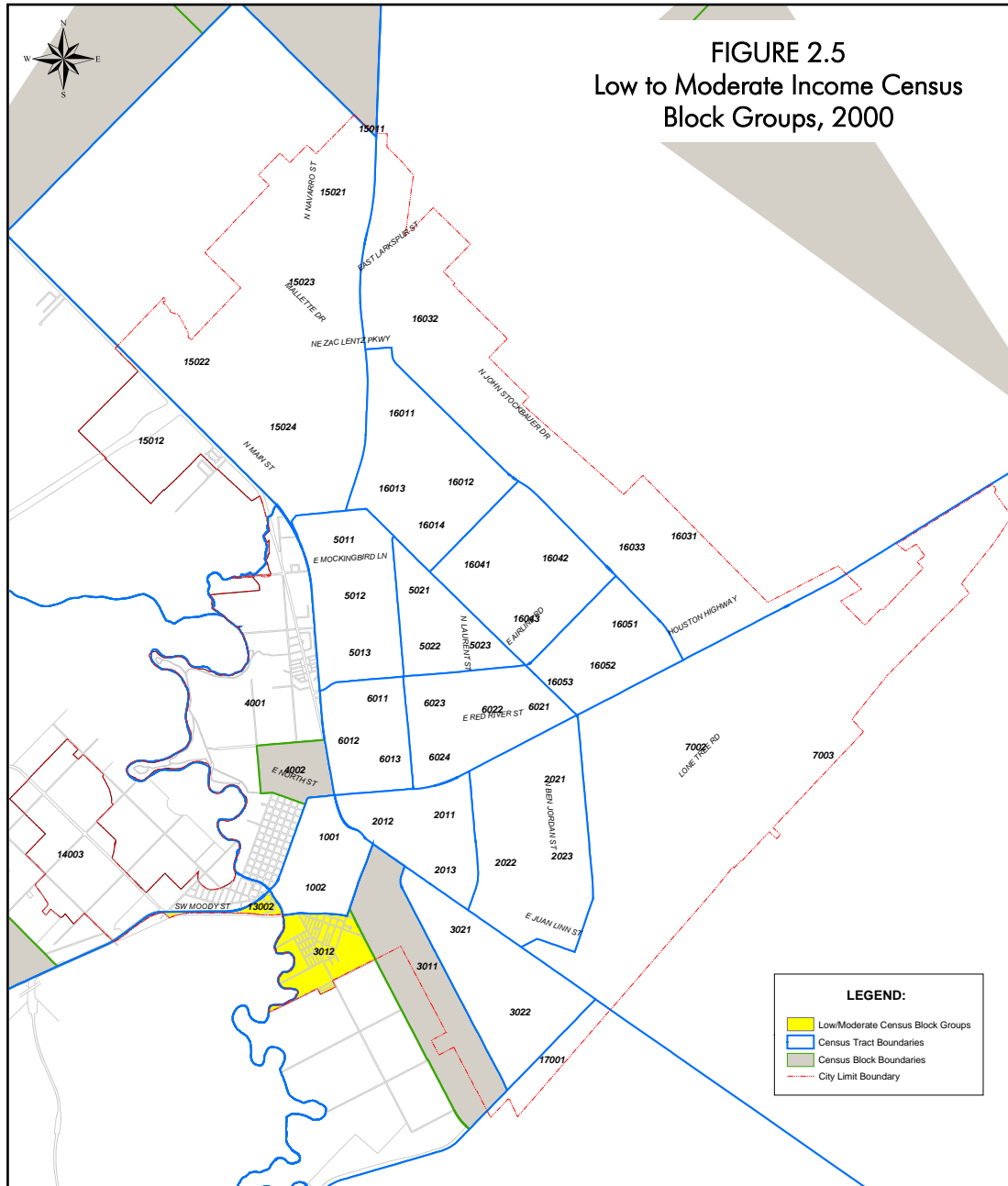
Type	Very Low (0-30%)	Low (31-50%)	Moderate (51-80%)	Total Low/Mod (0-80%)
Persons in Families	5,744	6,230	9,379	21,353
Persons in Non-Family	1,642	1,178	1,537	4,357
Total Persons	7,386	7,408	10,916	25,710

Source: U.S. Census, 2000

Poverty

It's significant to note that the number of persons living in poverty has decreased 4.2% from 18.9% in 1990 to 14.7% in 2000. However, there are still 8,690 individuals, 40% of which are children under the age of 18, living in poverty. Eleven percent (11%) of those over the age of 65 in Victoria are at or below the poverty level.

Figure 2.5 displays the low to moderate income Census Block Groups.



Source: U.S. Census, 2000

Employment

According to employment data estimates, the labor force in Victoria in 2000 was made up of 32,759 people. Of these individuals, 31,490 were employed and 1,269 were unemployed, for an unemployment rate of 3.9%. Table 2.3 compares the unemployment rate in the City of Victoria with the unemployment rates in Victoria County and the State of Texas. While

unemployment rates for both 1990 and 2000 are slightly higher in the city than in the county, the rates for both the county and city are better than the rates for the state.

TABLE 2.3 CIVILIAN WORK FORCE & UNEMPLOYMENT RATES, 1990 - 2000

Civilian Work Force	City of Victoria		County of Victoria		State of Texas	
	1990	2000	1990	2000	1990	2000
Labor Force	26,990	32,759	36,293	44,075	8,510,262	10,448,500
Employed	25,694	31,490	34,648	42,464	8,071,312	10,032,700
Unemployed	1,296	1,269	1,645	1,611	438,950	415,800
Unemployment Rate	4.8%	3.9%	4.5%	3.7%	5.2%	4.0%

Source: Texas Workforce Commission, Civilian Labor Force Estimates, Average Annual Actual Estimates; and Golden Crescent Labor Market Report.

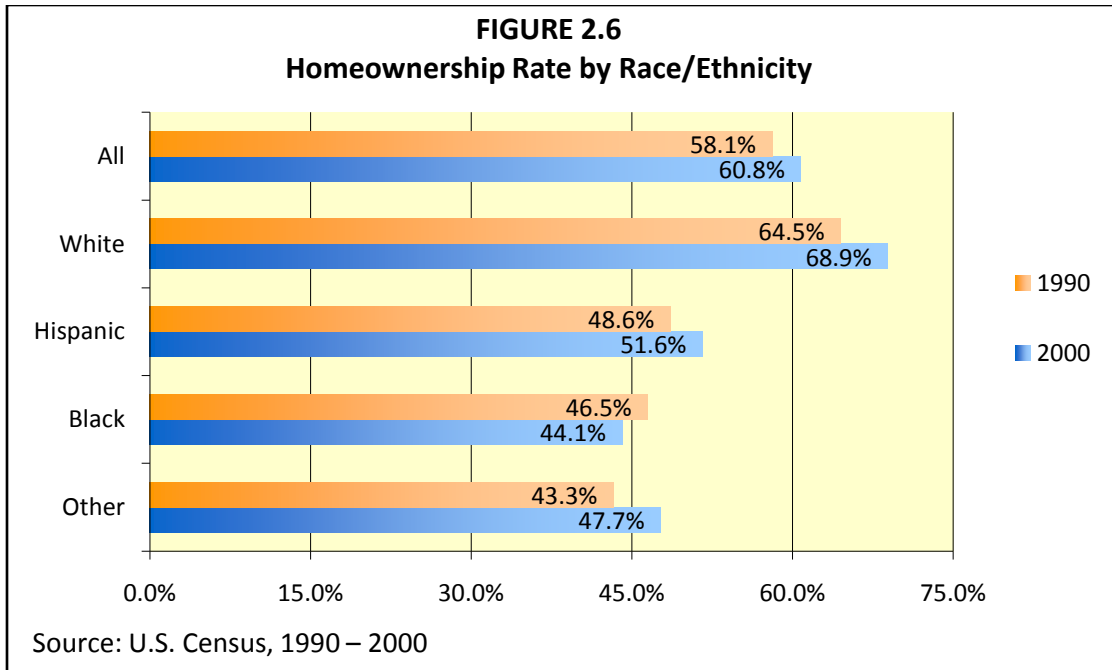
Employment trends continue to produce a high number of new jobs, while the overall growth of the City has inflated the cost of living initially. The Victoria Economic Development Corporation (VEDC) reported that over the last few years the cost of living has consistently decreased allowing Victoria to be more competitive. The cost of living for the first quarter of 2007 was 87.5%. This cost of living still has priced some residents out of the housing market and continues to exhibit need for non-profit organizations and government solutions. It is also notable that 34% of renters are paying more than 30% of their income for housing and 13% are paying more than 50% of their income for housing.

HOUSING MARKET ANALYSIS

The Housing Market Analysis provides information about the current state of housing in the City of Victoria. It begins by describing the city's housing tenure and includes the most recent data available for rent and vacancy rates and single-family home sale prices. Finally, the analysis provides projections of housing need by type for the year 2015.

Homeownership

Overall homeownership rates in Victoria have increased in the past decade to 60.8%. Low mortgage interest rates and public programs have been instrumental in making homeownership possible for more low and moderate income families. These trends along with more active outreach and innovation have led to increased access to homeownership. Figure 2.6 shows the breakdown of homeownership by race/ethnicity.



White households have the highest homeownership rate at 68.9%. Homeownership rates for Hispanic households increased by 3% over the last ten years. The only category to experience a decline was Black households from 46.5% in 1990 to 44.1% in 2000. Homeownership rates are 3% lower in Victoria than the state as a whole.

Housing Type

The U.S. Census Bureau estimated that there were 24,559 housing units in the City of Victoria in 2000. This was an increase of 12.6% from the 21,802 units that existed in 1990. Table 2.4 provides a comparison of the existing housing stock in 2000 and with that of January 1, 2010. The numbers are based on building permits issued by the city through the end of calendar year 2009 and the estimated number of demolitions through the same period. The data are shown by housing types; single-family, multi-family, and manufactured housing.

The estimates show that single-family units make up approximately 67.5% of the total housing units, whereas manufactured homes make up nearly 9.1%, and multi-family dwellings comprise the remaining 23.4%. Manufactured homes showed the largest percentage increase for the decade.

TABLE 2.4 HOUSING UNITS BY TYPE, 2000-2010

Type	Number of Units		% Change 2000-2010	% of Housing Stock (2010)
	2000	2010		
Single-family	17,064	18,370	7.7	67.5
Manufactured Homes	1,885	2,504	32.8	9.1
Multi-family	5,990	6,253	4.4	23.4

Demolitions		-319		
Total	24,559	26,808	17.3	100.0

Source: City of Victoria

Occupancy

The housing occupancy rate was approximately 91% in 1990. According to the 2000 Census, the occupancy rate remained fairly constant from the previous decade at 91.5%. There was a total of 24,192 housing units, of this total, 2,063 were vacant. 11.3 percent of rental units were vacant, while only 1.4% of homeowner units were vacant. Apartment/Multi-family units account for a large share of the vacancy rate with an average occupancy of 90.6%.

New Home Construction

Table 2.5 illustrates the number of single-family building permits issued by the City of Victoria since 2000. New home construction peaked in 2002 with 220 single-family building permits issued. Construction activity has dramatically tapered off to 27 permits in 2009. Most of the new home construction is occurring in the north and northeastern sections of the city.

TABLE 2.5 SINGLE-FAMILY BUILDING PERMITS

Year	Units Permitted
2000	167
2001	141
2002	220
2003	138
2004	120
2005	123
2006	156
2007	130
2008	84
2009	27
Total	1306

Source: City of Victoria



Housing Sales

According to the Real Estate Center at Texas A&M University, Victoria's median house price in 2009 was \$133,800, an increase of slightly more than 31.3% over the 2005 figure of \$101,900. Table 2.6 shows the percentage of total Victoria County housing sales (Multiple Listing Service) in each price range from less than \$29,999 to more than \$500,000 during the years 1995 to 2009. This table reveals that the price range with a majority of home sales (shaded in blue) experienced a significant increase, with the greatest jump occurring between 1995 and 2000.

TABLE 2.6 PRICE DISTRIBUTION OF HOMES SOLD IN VICTORIA COUNTY

Price Range	1995	2000	2005	2009
\$29,999 or less	8.3	4.4	3.2	2.2
30,000 – 39,999	12.0	5.7	2.2	5.4
40,000 – 49,999	10.0	6.4	4.0	7.1
50,000 – 59,999	13.0	7.2	4.9	3.7
60,000 – 69,999	17.2	9.4	4.9	7.0
70,000 – 79,999	11.1	11.8	7.3	5.4
80,000 – 89,999	9.4	12.2	9.9	6.1
90,000 – 99,999	4.0	9.4	12.5	5.9
100,000 – 119,999	5.8	11.5	13.4	11.7
120,000 – 139,999	3.8	7.1	14.2	12.8
140,000 – 159,999	2.0	3.8	6.1	11.1
160,000 – 179,999	0.5	4.1	4.6	8.5
180,000 – 199,999	0.7	2.3	3.9	5.4
200,000 – 249,999	1.3	2.4	4.1	7.4
250,000 – 299,999	0.4	1.4	2.7	4.9
300,000 – 399,999	0.4	1.0	1.3	2.3
400,000 – 499,999	0.0	0.0	0.6	0.8
500,000 and more	0.2	0.0	0.2	0.6

Source: Real Estate Center at Texas A&M University, Victoria Board of Realtors

Rental Housing

Apartment prices have experienced a modest increase since 2005. According to Apartment MarketData Research Services, the average rent per square foot increased from \$0.60 in 2005 to \$0.66 in 2009. The fair market rent for a one bedroom apartment was \$658 and \$800 for a two bedroom.

Affordability

The Real Estate Center calculates on a yearly basis the ratio of median household income to the income needed to buy the median-priced home in the city. Table 2.7 shows this ratio, the Housing Affordability Index (HAI) for all households and for first-time homebuyers. A HAI of 1.00 would indicate that the median family income is just enough to qualify for a loan sufficient to purchase a median-price home. A higher index number indicates that more households can afford to buy a home. In 2008 Victoria had a higher median-priced home resulting in a lower ratio than the state as a whole. Of particular note is that first-time homebuyers are experiencing a more difficult time stepping into a home of their own.

TABLE 2.7 HOUSING AFFORDABILITY, 2008

	2008 Median Priced Home	Required Income to Qualify	HAI (All Households)	HAI (First-time Homebuyers)
Victoria	\$133,800	\$31,510	1.61	1.09
Texas	\$97,600	\$22,985	2.39	1.55
United States	\$196,600	\$46,152	1.33	0.66

Source: Texas A&M Real Estate Center

Substandard Condition

A unit is defined as “*substandard*” if it is lacking complete plumbing, complete kitchen facilities, or heating fuel. Table 2.8 presents the number of occupied units in Victoria lacking these amenities. Assuming that there is no overlap of these condition indicators, the Census data suggests that 2% of the 22,129 occupied units are in substandard condition.

TABLE 2.8 HOUSING UNITS LACKING BASIC AMENITIES

	Units	% of Units
Lacking complete plumbing facilities	129	0.58%
Lacking complete kitchen facilities	223	1.00%
No heating fuel used	93	0.42%
Total	445	2.01%

Source: U.S. Census, 2000

Units that are “*substandard but suitable for rehabilitation*” do not meet one or more of the HUD Section 8 housing quality standards and may include units with some of the same features of substandard units. These units are also likely to have deferred maintenance and may have some structural damage such as leaking roofs, deteriorated interior and exterior surfaces, and inadequate mechanical systems. However, the difference between substandard and substandard but suitable for rehabilitation is that units suitable for rehabilitation will have in place some (albeit limited) infrastructure that can be improved upon. Substandard units are likely candidates for demolition. Without evaluating housing units on a case-by-case basis, it is impossible to distinguish units that are substandard but suitable for rehabilitation. Therefore there isn’t reliable data available to determine the number of housing units needing rehabilitation.

Overcrowded Housing

In addition to substandard housing condition, another key factor to examine in evaluating housing condition is overcrowded housing. HUD defines an overcrowded unit as having more than one person per room. According to 2000 Census data, about 3% of owner occupied housing units were overcrowded and 4% of renter occupied units in Victoria were overcrowded. Table 2.9 shows the number of households in Victoria in overcrowded conditions, by tenure. Victoria’s percentage of households that are overcrowded is lower

than the national average (3.1% for owner occupied households and 11% for renter households).

TABLE 2.9 HOUSEHOLDS LIVING IN OVERCROWDED CONDITIONS

	Owner Occupied		Renter Occupied		Total Occupied	
1.01 to 1.50	421	1.9%	575	2.6%	996	4.5%
1.51 or more	226	1.0%	336	1.5%	562	2.5%
Total 1.01 or more	647	2.9%	911	4.1%	1,558	7.0%

Source: U.S. Census, 2000

TAX RATES

Tax rates vary from district to district within the City. The 2008 property tax rates are:

Victoria County	.3436
Victoria County Road & Bridge	.0550
Victoria Junior College	.1445
Victoria County Navigation District	.0314
Victoria County Ground Water District	.0097
Victoria Independent School District	1.3094
City of Victoria	.6500
TOTAL TAX RATE	2.5436

SUMMARY

The City of Victoria fully supports the purposes of the Federal Fair Housing Act and will continue to promote policies and practices to Affirmatively Further Fair Housing. This Analysis of Impediments will continue to be used as a planning guide as future programs and policies are derived.

AGGREGATE TABLE 4-1: DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS, 1 to 4 FAMILY HOMES, BY RACE, GENDER AND INCOME OF APPLICANT, 2008

MSA/MD:47020 VICTORIA, TX

Number of Loans

Race, Gender & Income	Apps. Received	Loans Originated	Apps. Approved But Not Accepted	Apps. Denied	Apps. Withdrawn	Files Closed as Incomplete
AMERICAN IND/ALASKAN NATIVE (TOTAL)	6	5	1	0	0	0
MALE	2	2				
FEMALE	0					
JOINT (MALE/FEMALE)	4	3	1			
ASIAN/PACIFIC ISLANDER (TOTAL)	1	1	0	0	0	0
MALE	0					
FEMALE	0					
JOINT (MALE/FEMALE)	1	1				
BLACK (TOTAL)	15	12	1	1	1	0
MALE	7	6			1	
FEMALE	3	2	1			
JOINT (MALE/FEMALE)	5	4		1		
NAT HAWAIIAN/OTHER PACIFIC ISL (TOTAL)		0	0	0	0	0
MALE	0					
FEMALE	0					
JOINT (MALE/FEMALE)	0					
WHITE (TOTAL)	433	352	20	32	26	3
MALE	162	127	7	14	11	3
FEMALE	62	50	3	5	4	
JOINT (MALE/FEMALE)	209	175	10	13	11	
2 OR MORE MINORITY RACES (TOTAL)	0	0	0	0	0	0
MALE	0					
FEMALE	0					
JOINT (MALE/FEMALE)	0					
JOINT (WHITE/MINORITY) (TOTAL)	6	6	0	0	0	0
MALE	0					
FEMALE	0					
JOINT (MALE/FEMALE)	6	6				

RACE NOT AVAILABLE (TOTAL)	41	23	3	5	9	1
MALE	8	5		1	1	1
FEMALE	4	3			1	
JOINT (MALE/FEMALE)	8	8				
HISPANIC OR LATINO (TOTAL)	146	118	5	10	12	1
MALE	59	46	3	4	5	1
FEMALE	27	20	1	3	3	
JOINT (MALE/FEMALE)	60	52	1	3	4	
NOT HISPANIC OR LATINO (TOTAL)	297	237	16	24	17	3
MALE	117	91	4	11	8	3
FEMALE	39	32	3	2	2	
JOINT (MALE/FEMALE)	141	114	9	11	7	
JOINT(HISPANIC OR LATINO / NOT HISPANIC OR LATINO (TOTAL)	28	27	1	0	0	0
MALE	0					
FEMALE	1	1				
JOINT (MALE/FEMALE)	27	26	1			
ETHNICITY NOT AVAILABLE (TOTAL)	31	17	3	4	7	0
MALE	3	3				
FEMALE	2	2				
JOINT (MALE/FEMALE)	5	5				
MINORITY STATUS						
WHITE NON-HISPANIC (TOTAL)	273	218	15	23	14	3
MALE	107	83	4	11	6	3
FEMALE	35	30	2	2	1	
JOINT (MALE/FEMALE)	131	105	9	10	7	
OTHERS, INCLUDING HISPANIC (TOTAL)	193	161	7	11	13	1
MALE	66	52	3	4	6	1
FEMALE	31	23	2	3	3	
JOINT (MALE/FEMALE)	96	86	2	4	4	
INCOME OF APPLICANTS						
LESS THAN 50% OF MSA MEDIAN	26	16	2	7	1	
50-79% OF MSA MEDIAN	93	73	2	12	5	1
80-99% OF MSA MEDIAN	81	58	4	7	10	2
100-119% OF MSA MEDIAN	74	65	5	2	2	

120% OR MORE OF MSA MEDIAN	217	183	10	9	14	1
INCOME NOT AVAILABLE	11	4	2	1	4	
TOTAL	502	399	25	38	36	4

AGGREGATE TABLE 4-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1 to 4 FAMILY HOMES AND MANUFACTURED HOME DWELLINGS, BY RACE, GENDER AND INCOME OF APPLICANT, 2008

MSA/MD:47020 VICTORIA, TX

Number of Loans

Race, Gender & Income	Apps. Received	Loans Originated	Apps. Approved But Not Accepted	Apps. Denied	Apps. Withdrawn	Files Closed as Incomplete
AMERICAN IND/ALASKAN NATIVE (TOTAL)	8	1	0	4	3	0
MALE	2			1	1	
FEMALE	4			2	2	
JOINT (MALE/FEMALE)	2	1		1		
ASIAN/PACIFIC ISLANDER (TOTAL)	26	19	1	2	3	1
MALE	10	6		2	1	1
FEMALE	2	2				
JOINT (MALE/FEMALE)	14	11	1		2	
BLACK (TOTAL)	29	13	3	8	5	0
MALE	7	4	1	1	1	
FEMALE	16	6	1	6	3	
JOINT (MALE/FEMALE)	6	3	1	1	1	
NAT HAWAIIAN/OTHER PACIFIC ISL (TOTAL)		0	0	2	0	0
MALE	0					
FEMALE	1			1		
JOINT (MALE/FEMALE)	1			1		
WHITE (TOTAL)	1185	676	76	214	211	8
MALE	383	210	21	68	80	4
FEMALE	194	107	15	42	28	2
JOINT (MALE/FEMALE)	602	359	40	102	99	2
2 OR MORE MINORITY RACES (TOTAL)	2	2	0	0	0	0
MALE	2	2				
FEMALE	0					
JOINT (MALE/FEMALE)	0					
JOINT (WHITE/MINORITY) (TOTAL)	9	4	0	2	3	0
MALE	0					
FEMALE	0					
JOINT (MALE/FEMALE)	9	4		2	3	

RACE NOT AVAILABLE (TOTAL)	111	70	12	17	11	1
MALE	18	8	3	4	3	
FEMALE	6	5		1		
JOINT (MALE/FEMALE)	20	12	1	5	2	
HISPANIC OR LATINO (TOTAL)	278	116	11	98	53	0
MALE	101	43	5	29	24	
FEMALE	49	19	1	19	10	
JOINT (MALE/FEMALE)	123	54	4	49	16	
NOT HISPANIC OR LATINO (TOTAL)	951	581	70	125	167	8
MALE	310	182	20	44	59	5
FEMALE	167	96	15	32	23	1
JOINT (MALE/FEMALE)	472	303	35	48	84	2
JOINT(HISPANIC OR LATINO / NOT HISPANIC OR LATINO (TOTAL)	39	20	1	11	7	0
MALE	0					
FEMALE	0					
JOINT (MALE/FEMALE)	39	20	1	11	7	
ETHNICITY NOT AVAILABLE (TOTAL)	104	68	10	15	9	2
MALE	11	5		3	3	
FEMALE	7	5		1		1
JOINT (MALE/FEMALE)	20	13	3	4		
MINORITY STATUS						
WHITE NON-HISPANIC (TOTAL)	882	542	66	113	154	7
MALE	289	170	19	40	56	4
FEMALE	148	88	14	26	19	1
JOINT (MALE/FEMALE)	443	284	33	46	78	2
OTHERS, INCLUDING HISPANIC (TOTAL)	383	172	16	121	73	1
MALE	120	53	6	33	27	1
FEMALE	68	27	2	25	14	
JOINT (MALE/FEMALE)	190	92	7	62	29	
INCOME OF APPLICANTS						
LESS THAN 50% OF MSA MEDIAN	70	17	7	32	12	2
50-79% OF MSA MEDIAN	201	81	15	68	37	
80-99% OF MSA MEDIAN	153	75	10	33	35	
100-119% OF MSA MEDIAN	144	87	13	27	17	

120% OR MORE OF MSA MEDIAN	781	505	45	88	135	8
INCOME NOT AVAILABLE	23	20	2	1		
TOTAL	1372	785	92	249	236	10

AGGREGATE TABLE 4-3: DISPOSITION OF APPLICATIONS TO REFINANCE LOANS ON 1 TO 4 FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, GENDER AND INCOME OF APPLICANT, 2008

MSA/MD:47020 VICTORIA, TX

Number of Loans

Race, Gender & Income	Apps. Received	Loans Originated	Apps. Approved But Not Accepted	Apps. Denied	Apps. Withdrawn	Files Closed as Incomplete
AMERICAN IND/ALASKAN NATIVE (TOTAL)	17	3	1	10	3	
MALE	4	1		2	1	
FEMALE	4	1	1	2		
JOINT (MALE/FEMALE)	9	1		6	2	
ASIAN/PACIFIC ISLANDER (TOTAL)	8	3	2	2		1
MALE	3	1		1		1
FEMALE	2	1	1			
JOINT (MALE/FEMALE)	3	1	1	1		
BLACK (TOTAL)	44	19	6	10	7	2
MALE	20	9	2	3	4	2
FEMALE	11	5	2	3	1	
JOINT (MALE/FEMALE)	13	5	2	4	2	
NAT HAWAIIAN/OTHER PACIFIC ISL (TOTAL)	4	1	1	1	1	
MALE						
FEMALE						
JOINT (MALE/FEMALE)	4	1	1	1	1	
WHITE (TOTAL)	1033	432	76	353	153	19
MALE	319	127	26	106	51	9
FEMALE	175	60	15	71	25	4
JOINT (MALE/FEMALE)	531	240	35	175	75	6
2 OR MORE MINORITY RACES (TOTAL)	1	1				
MALE	1	1				
FEMALE						
JOINT (MALE/FEMALE)						
JOINT (WHITE/MINORITY) (TOTAL)	6	4		1	1	
MALE						
FEMALE						
JOINT (MALE/FEMALE)	6	4		1	1	

RACE NOT AVAILABLE (TOTAL)	228	53	8	99	55	13
MALE	52	8	1	27	15	1
FEMALE	26	6	1	15	4	
JOINT (MALE/FEMALE)	55	14		22	11	8
HISPANIC OR LATINO (TOTAL)	374	118	25	180	41	10
MALE	131	39	8	57	20	7
FEMALE	72	16	8	43	5	
JOINT (MALE/FEMALE)	168	62	9	79	15	3
NOT HISPANIC OR LATINO (TOTAL)	756	336	59	218	127	16
MALE	237	102	20	68	42	5
FEMALE	134	53	11	44	22	4
JOINT (MALE/FEMALE)	379	178	28	106	60	7
JOINT(HISPANIC OR LATINO / NOT HISPANIC OR LATINO (TOTAL)	43	13	4	14	11	1
MALE	3		1	1		1
FEMALE	1		1			
JOINT (MALE/FEMALE)	39	13	2	13	11	
ETHNICITY NOT AVAILABLE (TOTAL)	168	49	6	64	41	8
MALE	28	6		13	9	
FEMALE	11	4		4	3	
JOINT (MALE/FEMALE)	35	13		12	6	4
MINORITY STATUS						
WHITE NON-HISPANIC (TOTAL)	679	308	52	198	109	12
MALE	209	92	18	62	34	3
FEMALE	116	45	10	37	20	4
JOINT (MALE/FEMALE)	350	168	24	99	54	5
OTHERS, INCLUDING HISPANIC (TOTAL)	476	157	36	210	60	13
MALE	157	49	11	63	24	10
FEMALE	85	22	10	47	6	
JOINT (MALE/FEMALE)	231	85	15	99	29	3
INCOME OF APPLICANTS						
LESS THAN 50% OF MSA MEDIAN	71	14	3	46	7	1
50-79% OF MSA MEDIAN	187	60	12	87	24	4
80-99% OF MSA MEDIAN	171	60	12	65	30	4
100-119% OF MSA MEDIAN	146	48	18	58	16	6

120% OR MORE OF MSA MEDIAN	686	293	47	207	121	18
INCOME NOT AVAILABLE	80	41	2	13	22	2
TOTAL	1341	516	94	476	220	35