City of Dallas

Dallas Housing Policy 2033

City Council Briefing
March 1, 2023

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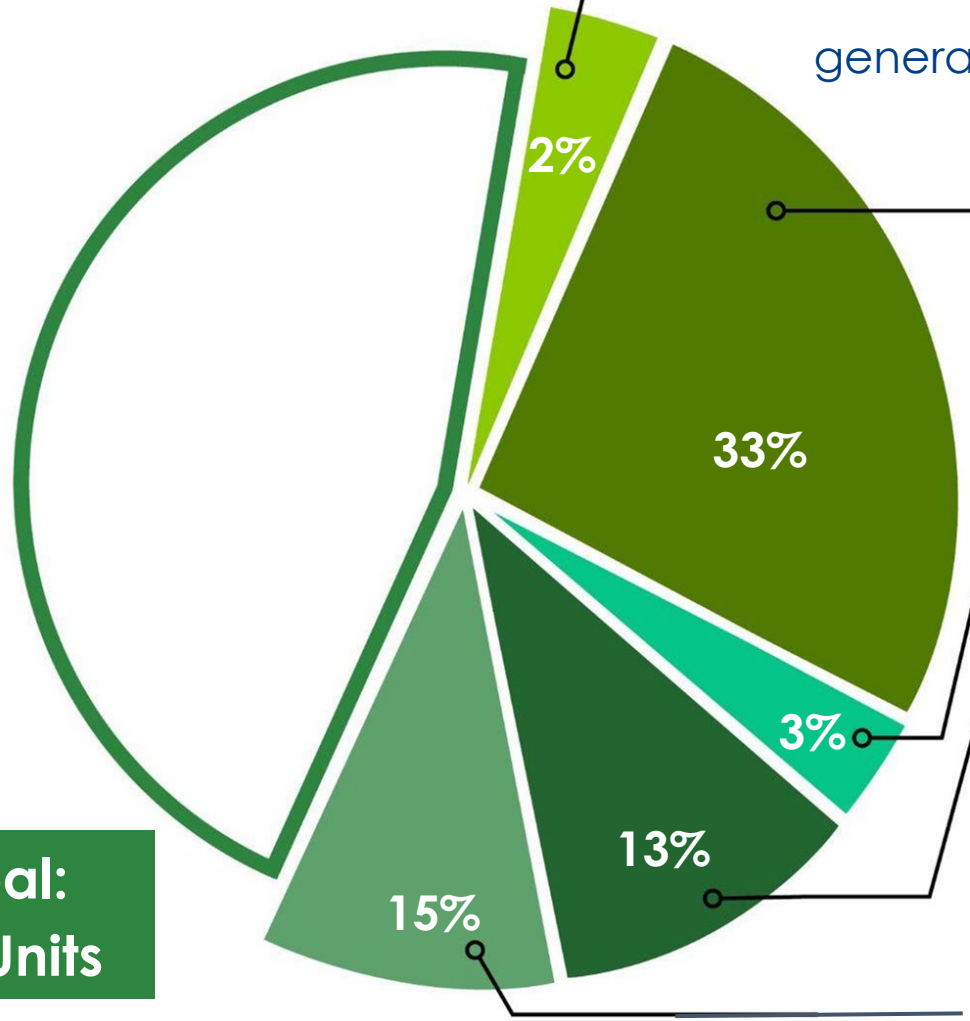
PRESENTATION OVERVIEW

- Background
- Integration with City Initiatives
- Process to date: Timeline
- Racial Equity Audit of the CHP Findings
- Racial Equity Audit Recommendations
- From Recommendations to Policy
- Dallas Housing Policy 2033
- Community Engagement Structure
- Implementation
- Next Steps
- Appendices

BACKGROUND: MOTIVATION FOR CHP ADOPTION

- City was responding to compliance allegations from City Auditor, HUD, HUD OIG and the media.
- City commissioned UT Arlington to issue a poverty study showing that Racially/Ethnically Concentrated Areas of Poverty were growing across the city.
- Housing advocates were demanding the city invest in more affordable housing.

BACKGROUND: PRODUCTION≠IMPACT



CHP Goal: 20,000 Units

Land Bank/Land Transfer
generated **418 units** complete or under construction since 2018.

Mixed Income Housing Development Bonus
generated over **6,500 units** approved since 2019

Home Repair Activities
generated **over 550 units** complete or in process since 2018.

Dallas Public Facility Corporation
generated **2,539 units** under construction or anticipated to close in 2023.

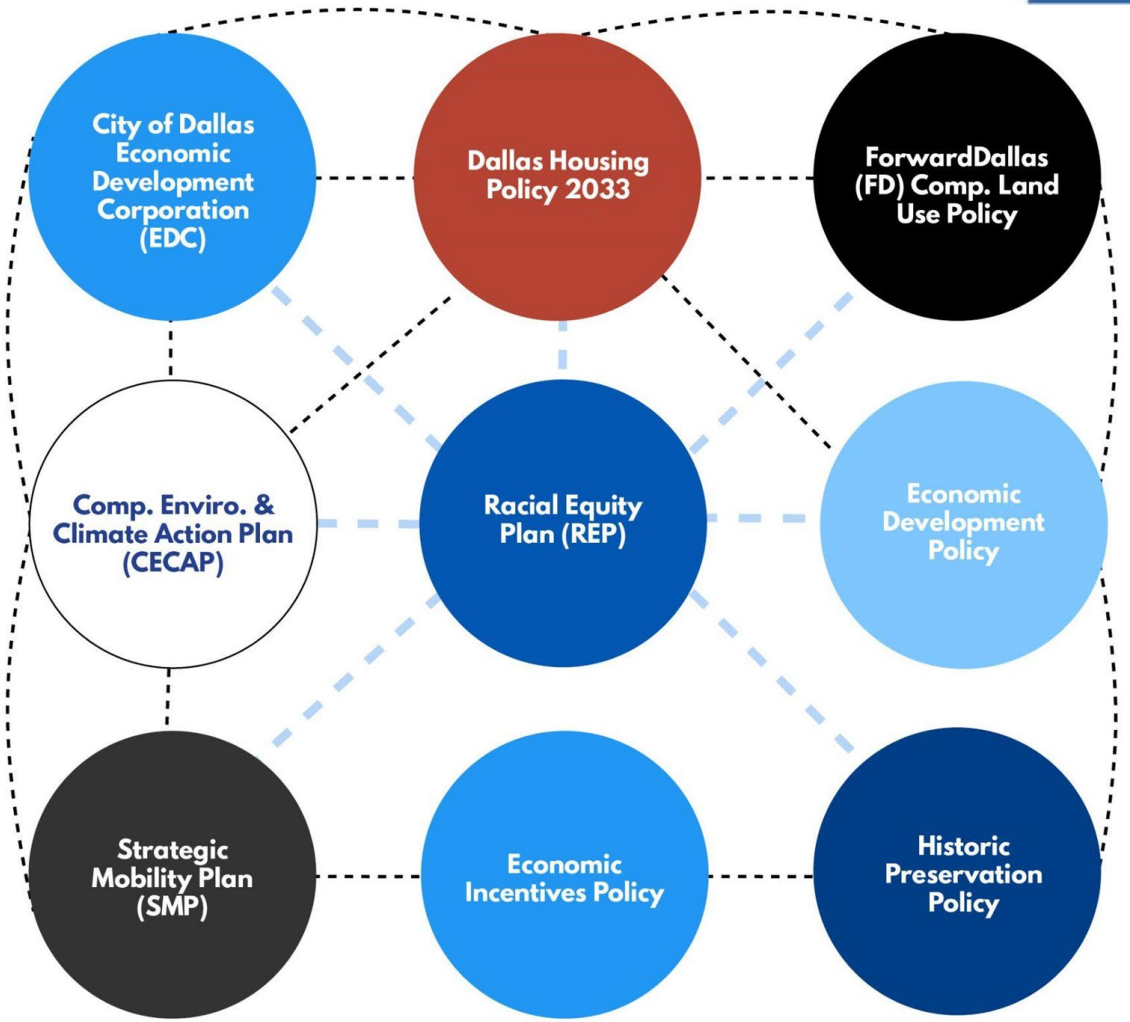
Dallas Housing Finance Corporation
generated over **3,000 units** under construction since 2018

Go Forward Plan

INTEGRATION WITH CITY INITIATIVES

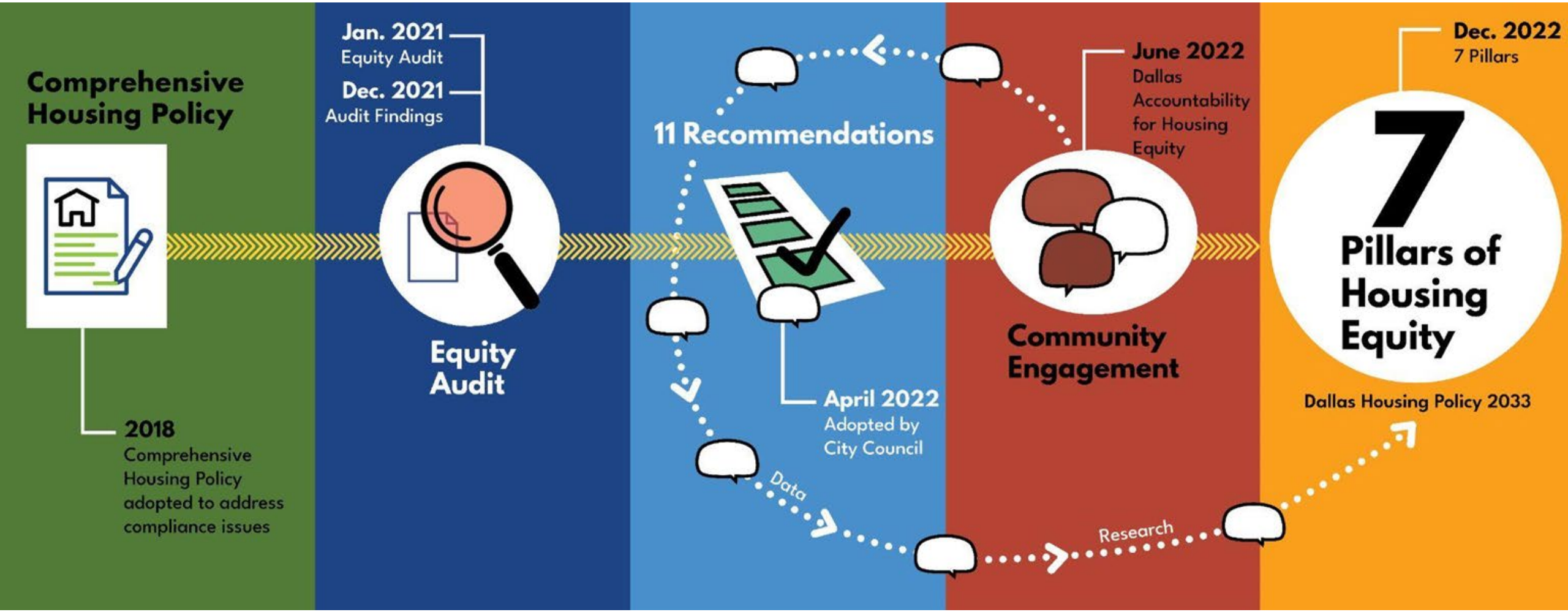
Coordination of expertise and resources to produce a comprehensive impact. Examples include:

- REP – Big Audacious Goals to build equity across 42 city departments.
- CECAP – allocating resources in targeted manner with internal/external stakeholders.
- Forward Dallas – using zoning to integrate affordability where needed.
- *City Building Codes - Embracing Innovations in housing types*



DIRECTIVE OF THE POLICY

PROCESS TO DATE: TIMELINE



RACIAL EQUITY AUDIT OF THE CHP FINDINGS

Racial Equity Assessment Findings: Structural Challenges of the CHP*

- The CHP is silent on equity. The current structure does not allow for historical policies and practices to be remedied such that we can achieve our overarching goal of an equitable Dallas.
- The lion's share of the CHP (131/148 pages) is devoted to detailed descriptions of the 13 housing programs and administrative rules and regulations.
- Goals of the CHP lack strategy or accountability.

Comprehensive Housing Policy Racial Equity Assessment - TDA

RACIAL EQUITY AUDIT OF THE CHP FINDINGS

Racial Equity Audit Findings: Structural Challenges of the CHP*

Specific gaps identified in the CHP include:

- No vision or strategy to reach the high-level goals or how to coordinate the 13 programs in concert or leverage with other public or private housing initiatives
- No acknowledgement of policies that have promoted segregation and inequality
- No goals tied directly to increased equity by reducing racial disparities
- No specific strategies for redressing deep-rooted inequities by leveling the playing field for historically disadvantaged communities.

Comprehensive Housing Policy Racial Equity Assessment - TDA

RACIAL EQUITY AUDIT OF THE CHP FINDINGS

Racial Equity Audit Findings: Structural Challenges of the CHP

Specific gaps identified in the CHP include:

- No road map for comprehensive planning that accounts for localized impediments to affordable housing development, for example, the significant differences, from one area of the city to another, in land acquisition costs, infrastructure needs, and zoning issues
- Insufficient funding to achieve affordable housing production targets and advance equity in affordable housing access, as compared to cities such as Austin, Atlanta, and Seattle
- No evaluation framework with which the Council and public can measure progress in reaching the overarching goals the CHP outlines
- No guidance on how city staff should nimbly adjust subsidy terms as market dynamics evolve and rapidly impact the viability of affordable housing development projects

*Comprehensive Housing Policy Racial Equity Assessment - TDA

RACIAL EQUITY AUDIT RECOMMENDATIONS

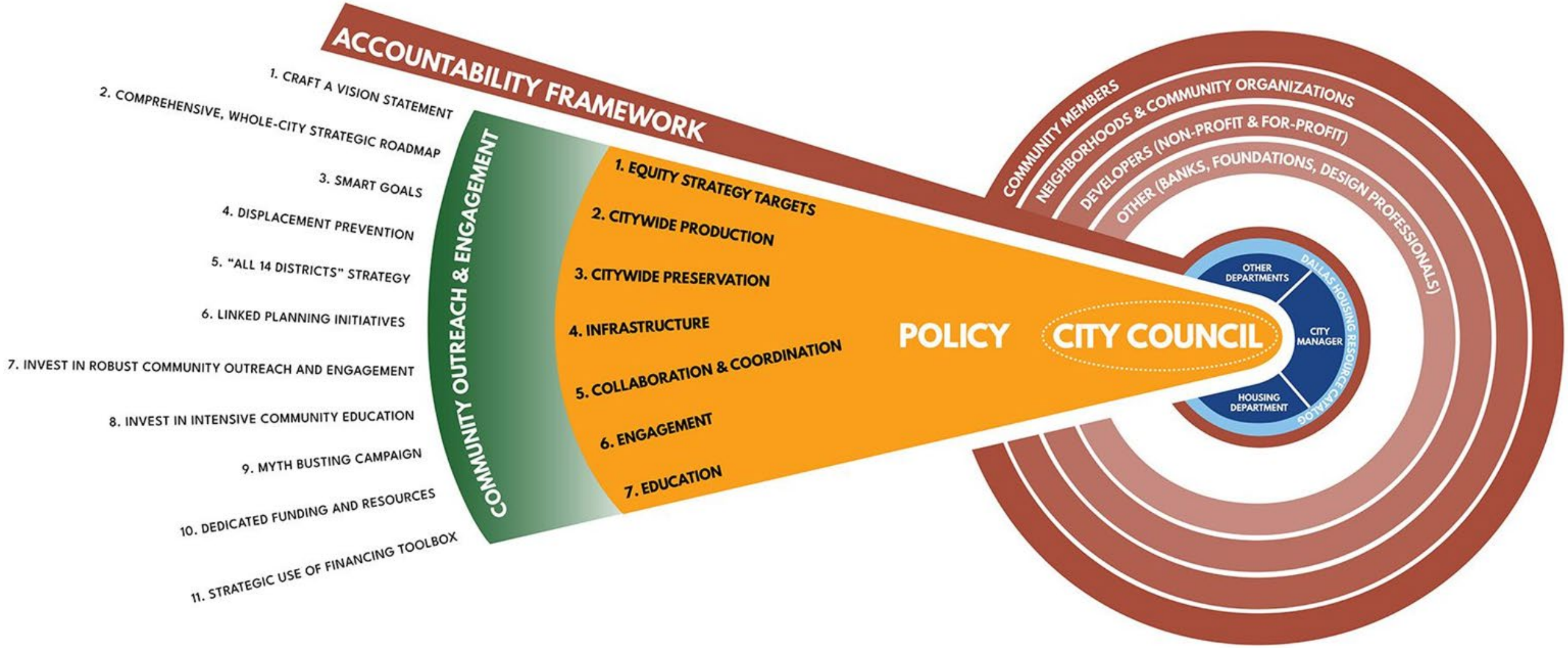
1. Craft a Vision Statement
2. Comprehensive, Whole-City Strategic Roadmap
3. SMART Goals
4. Displacement Prevention
5. "All 14 Districts" Strategy
6. Linked planning initiatives
7. Invest in Robust Community Outreach and Engagement
8. Invest in intensive community education
9. Myth Busting Campaign
10. Dedicated Funding and Resources
11. Strategic use of Financing Toolbox

FROM RECOMMENDATIONS TO POLICY

Recommendations	Research	Policy Development	SMARTIE Goals	Accountability
11 Recommendations Adopted by City Council Foundation for new housing policy	Demonstrate community-wide affordable housing capacity and gaps Analyze current programs' effectiveness Identify gaps Review strategies used by other cities Ensure all 14 district are contributing to equitable strategies	Finish **Vision Statement** Draft policy strategies Build housing and revitalize neighborhoods through a racial equity lens. Serve housing needs of residents across the income spectrum.	**SMARTIE Goals** are **S**pecific, **M**easurable, **A**chievable, **R**elevant, **T**ime-bound, **I**nclusive, **E**quitable Develop a set of measurable, equitable goals that will bring the policy strategies to life Identify tactics and resources to implement **SMARTIE goals** Align programs and initiatives with **SMARTIE goals**	Develop a transparent structure where City staff will continuously show progress on SMARTIE goals Communication strategy such that City officials and the community are updated at regular intervals Structure for ongoing communication between City staff, City officials and community stakeholders

Community Meetings and 2-Day Strategy Session + **Ongoing communication, input and feedback** → **Community Engagement with all 14 Districts**

DALLAS HOUSING POLICY 2033: THE SEVEN PILLARS OF HOUSING EQUITY



1. EQUITY STRATEGY TARGETS

POLICY STATEMENT:

Identify any specific barriers in housing opportunities and reduce them utilizing a targeted approach

SMARTIE Goals:

- Establish boundaries for strategy target areas by December 31, 2024
- Identify resources and align progress measures by December 31, 2023
- Establish neighborhood criteria for anti displacement investments by December 31, 2023
- Ensure City Service Areas coordinate activities with selected strategy target areas by December 31, 2024

2. CITYWIDE PRODUCTION

POLICY STATEMENT:

Increase production to improve housing affordability for a broad mix of incomes *in all areas of the city*

SMARTIE Goals:

- By December 31, 2033, increase the annual production of dedicated affordable rental housing units by outlined percentages based on median incomes
- By December 31, 2033 increase annual production of affordable homeownership units by set percentages relative to income thresholds
- By December 31, 2024, integrate the Anti-Displacement Toolkit methods and resources into City's production strategy.

3. CITYWIDE PRESERVATION

POLICY STATEMENT:

Increase preservation of affordable housing stock *in all areas of the city*

SMARTIE Goals:

- By December 31, 2024, create a database of naturally occurring affordable housing and specific city-wide targets for its preservation.
- By December 31, 2033, annually, preserve a minimum of 50% of housing units with expiring affordability requirements that meet standards ensuring sustained habitability.

4. INFRASTRUCTURE

POLICY STATEMENT:

Prioritize infrastructure investments in equity strategy target areas

SMARTIE Goal:

- By December 31, 2033, the City will reduce identified infrastructure deficits in all equity strategy target areas to facilitate mixed-income housing development, leverage economic development opportunities, and reduce disparities.

5. COLLABORATION and COORDINATION

POLICY STATEMENT:

Align strategies and resources to maximize the impact of partnerships with internal and external stakeholders

SMARTIE Goals:

- By December 31, 2024, collaboration among the City Housing Department and other departments will have resulted in the following:
  - A resource consisting of agreements that impact housing development and revitalization through cross-departmental investment
  - A sustainable structure and schedule for joint presentations and events reflecting the collaboration and synergy of efforts.
  - Collaborative initiatives to which multiple departments contribute that support the Dallas Housing Policy 2033 strategies and goals
  - Aligned cross-departmental and external partner agreements that are reviewed annually that delineate the terms of their partnerships.

6. ENGAGEMENT

POLICY STATEMENT:

Cultivate communication forums with all residents including those historically disadvantaged to guide the City's housing investment decisions

SMARTIE Goals:

- By December 31, 2023, the City will establish a sustainable community engagement and accountability structure
- Housing & Neighborhood Revitalization Department will have a method for monitoring community engagement annually through December 31, 2033
- By June 30, 2024, the City will establish an inclusive Housing Policy Taskforce that is comprised of community members, business, philanthropy, nonprofits and faith-based organizations that is maintained through December 31, 2033

7. EDUCATION

POLICY STATEMENT:

Develop a city-wide collaborative campaign to increase YIMBYism through housing affordability and housing equity.

SMARTIE Goals:

- By December 31, 2024 the City will have a curriculum on Equity and YIMBISM that crosses multiple City departments that informs public programs, exhibits, and community outreach.
- By December 31, 2024, the City will have established a system for annual review of impact and accomplishments reflecting deliverables aligned with the Education Pillar strategy components.
- By December 31, 2024, the City will have aligned cross-departmental and external partner agreements for the Education Pillar that are reviewed annually that delineate the terms of their partnerships.

BUILDING AN INCLUSIVE, SUSTAINABLE COMMUNITY ENGAGEMENT PROCESS

QUOTE:

"A need for measurement or metrics and evaluation of accountability and transparency on an annual basis. The metrics are set by community members." - *Meeting Participant*

DRIVER:

Transparency and accountability

Robust Community Engagement

- Build capacity to partner with community entities in developing, promoting and implementing Dallas Housing Policy

Transparent Reporting and Feedback Structure

- Accessible: using multiple communication modes
  - Technology, In person, hard-copy, multiple languages

Partner with a group knowledgeable on how to develop inclusive, sustainable community engagement

BUILDING AN INCLUSIVE, SUSTAINABLE COMMUNITY ENGAGEMENT PROCESS

QUOTE:

"Prioritize community groups as the experts of their area, they should be prioritized before others." - *Meeting Participant*

DRIVER:

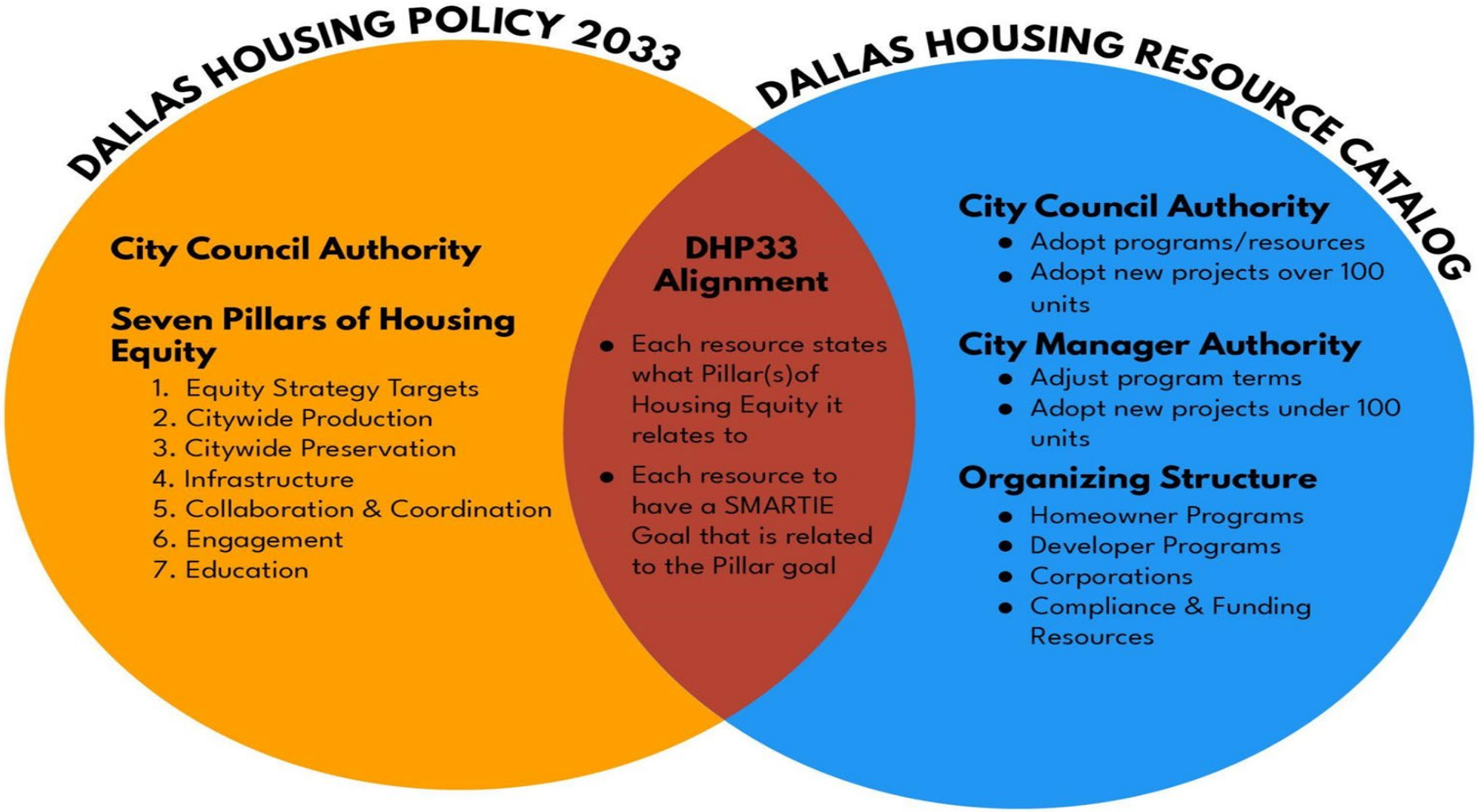
Transparency and accountability

Inclusive Housing Task Force

- Representative Body, with a chair, selected by a community member, staff representative and , City Council Housing and Equity Committee Chairs
  - Membership would be defined with numbers of community members, developers, philanthropy, faith-based groups and nonprofits
- Open Nomination process that includes time to educate community on purpose, opportunities and responsibilities
- Meeting held in community and at times conducive to maximum community attendance
- Consistent, multimodal communication between meetings

**See Appendix of a Sample Model*

IMPLEMENTATION: PHASE 1



IMPLEMENTATION: NEW ACTIVITIES

External Agreements

For Example:

- Anti-Displacement Toolkit - BoH
- Dallas Housing Opportunity Fund – LISC/TREC
- Emerging Developer Program
- Outsourcing Preservation Programs
- TDHCA Homebuyer Programs
- Financial Literacy & Education Providers

IMPLEMENTATION: FUNDING

- Community Development Block Grant: $6M
- HOME Investment Partnership Program: $5.4M
- General Funds: $500K
- *American Rescue Plan Act: $26.6M (One-Time Funds)*
- Current budget does not meet needs.
- Reports suggest 100,000 units are needed across DFW, if Dallas targeted 20% as gap in units, at a cost of $200K/unit, $4B is needed.
- Given a 1:10 expected leverage ratio with private sector, Dallas would need $400M to close gap.

IMPLEMENTATION TIMELINE

NEXT STEPS

- Finalize the Dallas Housing Policy 2033
- City Council to adopt Dallas Housing Policy 2033
- City Council to adopt Dallas Housing Policy Resource Catalog
- Socialize DHP 2033
- Build sustainable community engagement structure
    - Revamped Housing Policy Task Force
- Create first Housing Data Dashboard to supplement/replace monthly Performance Reports
- Identify Equity Strategy Target Areas
    - data driven
    - engagement process utilized

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Appendix A: Comprehensive Housing Policy Equity Analysis

Housing and Homelessness Solutions Committee
December 14, 2021

John Gilvar
Christine Campbell
Michele Williams
TDA Consulting

Presentation Overview

- Background/History
- Purpose
- Issues/ Operational or Business Concerns
- Operational Impact
- Proposed Action
- Next Steps

Background/Scope

- The Comprehensive Housing Policy (CHP) is the primary tool for addressing the local affordable housing crisis
- Engaged TDA to analyze the ways the CHP helps or hinders the City in reaching its racial equity goals
- Analysis conducted July – October 2021
- Utilized Race Forward Framework

Purpose

Primary Research Questions

- What are the current barriers to safe, quality, affordable housing disproportionately experienced by Black and Brown residents?
- What are the root causes of these barriers, and how do these causes continue to shape the landscape of the affordable housing crisis?
- How does the CHP empower or disempower city leaders to address these root causes by accelerating access to safe, quality, affordable housing in a way that reduces racial disparities and ameliorates Dallas's North/South Divide?

Purpose

Historical Context Common to many US Cities

- Policies and practices stretching back to the Civil War era that:
  - Discriminated against Black and Brown residents
  - Purposefully excluded them from safe, quality, affordable housing in addition to economic and educational opportunities
  - Relegated them to living in areas with substandard infrastructure and environmental hazards
- The current landscape of the affordable housing crisis continues to reflect these historical forces, creating higher barriers for present-day Black and Brown residents:
  - Significantly lower homeownership rates and median home values
  - Significantly higher rates of rent burdening and homelessness

SOURCE: *Analysis of Impediments to Fair Housing Choice, City of Dallas, 2019*

Issues/Operational Concerns

Methods

- Twenty interviews/listening sessions with a total of 93 participants
- Tours of Southern Dallas and recently redeveloped areas
- Review of existing research on affordable housing challenges, local plans and local historical accounts of race relations and race-based housing policies and practices
- Review of existing Housing Department data
- In-depth interrogative review of the CHP as currently written

Issues/Operational Concerns

Structure of the CHP

- The CHP is silent on equity. The current structure does not allow for historical policies and practices to be remedied such that we can achieve our overarching goal of a more equitable city

  - The lion's share of the CHP (131/148 pages) is devoted to detailed descriptions of the 13 housing programs and administrative rules and regulations.
  - Only a brief background section identifies the goals of the CHP.

We need to acknowledge we are tackling this with our hands behind our backs. There are laws that prevented blacks from owning homes – structures that had generational effects. We can't fix it without legal remedies. It was illegal for blacks to own mortgages. We need to tackle root causes. Some infrastructure investment needs to be made.

--Participant in LGBTQ Stakeholder Listening Session

Issues/Operational Concerns

- Structure of the CHP (continued)

Specific gaps identified in the CHP include:

- Vision or strategy to reach the high-level goals or how to coordinate the 13 programs in concert or leverage with other public or private housing initiatives
- No methods for addressing the impacts of policies and practices that have promoted segregation and inequality
- No goals tied directly to increased equity by reducing racial disparities
- No specific strategies for redressing deep-rooted inequities by leveling the playing field for Black and Brown residents and historically Black and brown communities.

Issues/Operational Concerns

- Structure of the CHP (continued)

Specific gaps identified in the CHP include:

- No road map for comprehensive planning that accounts for localized impediments to affordable housing development, for example, the significant differences, from one area of the city to another, in land acquisition costs, infrastructure needs, and zoning issues

- No evaluation framework with which the Council and public can measure progress in reaching the overarching goals the CHP outlines

- No guidance on how city staff should nimbly adjust subsidy terms as market dynamics evolve and rapidly impact the viability of affordable housing development projects

- Insufficient funding to achieve affordable housing production targets and advance equity in affordable housing access, as compared to cities such as Austin, Atlanta, and Seattle

Issues/Operational Concerns

Issues/ Operational Concerns

Structure of the CHP: Equity Blind Spots

CHP Section	Equity Blind Spots
Goals 1. Create and maintain available and affordable housing throughout Dallas, 2. Promote greater fair housing choices, and 3. Overcome patterns of segregation and concentrations of poverty through incentives and requirements.	Goals do not demonstrate the overall desired state of an equitable Dallas with a level playing field for accessing safe, quality, affordable housing. Without making this desired state clear in the initial goals, the Council, staff, and public are not pushed to consider CHP programs through an equity lens. Further, the strategy of using incentives and requirements does not adequately reflect or address the historical policies and practices that made the current playing field so tilted to the disadvantage of Black and Brown residents.
References to Existing Plans	The policy lists the three plans: forwardDallas! Neighborhood Plus, and The Consolidated Plan. However, the CHP does not discuss how these plans should work together or how they connect to the CHP. Further, there is no outline of who is accountable for ensuring the interdepartmental collaboration to integrate related plans and policies. The CHP has no apparent connection to the Dallas Equity Indicators Report (2019). A connection to this report could help gauge how well the policy is moving Dallas toward the Council's equity goals.

Issues/Operational Concerns

Issues/ Operational Concerns

Structure of the CHP: Equity Blind Spots

Reinvestment Strategy Areas	**The CHP lists the Reinvestment Strategy Areas:** • **Redevelopment Areas** • **Stabilization Areas** • **Emerging Market Areas** **These areas are described and defined. The gap is that there are no descriptions on how reinvesting in these areas addresses the historic racist policies or patterns of segregation. Nor are there connections made that outline how certain prioritized work or development in these areas will help achieve the CHP's goals.** **The CHP should include explanations of how different reinvestment strategies will specifically increase equity and decrease segregation.**
Production Goals	In the absence of a whole-city vision for increased equitable affordable housing and revitalized neighborhoods, the production goals are a set of numbers with no connection to strategies that could lead Dallas toward the desired state. When production goals are established that align with the desired equitable impact, resources should be identified from multiple funding streams that will allow for those production goals to be achieved.

Issues/Operational Concerns

Issues/ Operational Concerns

Structure of the CHP: Equity Blind Spots

List and Description of Programs

- Homeowner Programs
  - Home Improvement and Preservation
  - Subrecipient Minor Home Repair Major Rehabilitation Forgivable Loan Program
  - Housing Reconstruction Program
  - Dallas Homebuyer Assistance Program
  - DHAP Targeted Homebuyer Incentive Program
- Landlord Programs
  - Home Improvement and Preservation Rental Program
- Tenant Programs
  - Tenant-Based Rental Assistance Programs
- Developer Programs
  - New Construction and Substantial Rehabilitation Program
  - Mixed-Income Housing Development Bonus
  - Land Transfer Program
- Preserving Affordability
  - Title Clearing and Clouded Title Prevention Program
  - Community Land Trust Program
  - Targeted Rehabilitation Program

The CHP lists these programs and their requirements. The listing of these programs is not policy.

Many programs are under-resourced and difficult to access.

City Council management of city approval processes politicizes implementation, often to the detriment of progress toward the desired state of increased equity.

These programs should be tools for an overall plan approved by the Council and managed by the staff. The Council would oversee ensuring that benchmarks are reached and assist staff in overcoming barriers at the policy level. The comprehensive strategic roadmap described above would outline in detail how each program would be used to achieve the goals.

Issues/Operational Concerns

Issues/ Operational Concerns

Structure of the CHP
Equity Blind Spots

Neighborhood Investment	The CHP defines Neighborhood Investment Zones and what they can be used for. NEZs could be used as a tool to build equity in the context of a broader strategic road map. This section, however, does not describe how NEZ are to be used strategically or with an eye to advancing equity.
Funding and Supporting Actions	This section lists the various federal, state, and local funding sources available to support the city's housing programs. Again, there is no description of how these funding sources should be used to achieve the desired state. Every CHP goal needs a developed strategy that includes how achieving the goal will be funded. Rather than just a list of funding sources, the CHP requires an outline of how each funding source will be leveraged and combined with other sources to achieve each goal. Each strategy must also include a timeframe.
Strategies, Tools, and Programs that will Require Additional Action	This section lists areas that require further exploration, but it provides no connection to the current CHP goals nor to needed goals around creating greater equity in Dallas's affordable housing landscape.

Proposed Action

- The city's success will boil down to a limited number of critical choices its leaders must make if they are authentically committed to tackling its daunting array of housing disparities. The following three questions can best express these choices:
  - **Will city leaders create a strategic road map that sets a course toward redressing the vast North/South divide?**
  - **Will they address the 150-year-old legacy of race-based policy choices has saddled Southern Dallas with an enormous deficit in the basic infrastructure upon which the development of mixed-income neighborhoods depends?**
  - **Will they actively work to level the playing field that has been tilted in favor of predominantly White areas to the North by making significant investments in Southern Dallas?**

Recommendations

1. Create a CHP vision statement articulating how the affordable housing playing field will be leveled for all racial groups and across the North/South Divide

2. Create a comprehensive, city-wide strategic road map for coordinating the CHP's array of tools while also leveraging community partnerships to address the very different needs for change from one area of the city to another

3. Establish SMART (Specific, Measurable, Achievable, Relevant, Time-Bound) goals for the CHP that point to the desired state

Recommendations

4. Strengthen linkages between the CHP and neighborhood revitalization strategies that leverage infrastructure improvements, economic revitalization, and mixed-use master planning to build a foundation for increasing generational wealth in historically Black and Brown communities

5. Add a CHP goal around remedying the enormous infrastructure deficit that has persisted in Southern Dallas for generations

6. Utilize an “All 14 Districts” model to combat ubiquitous NIMBYism across all areas of Dallas

Recommendations

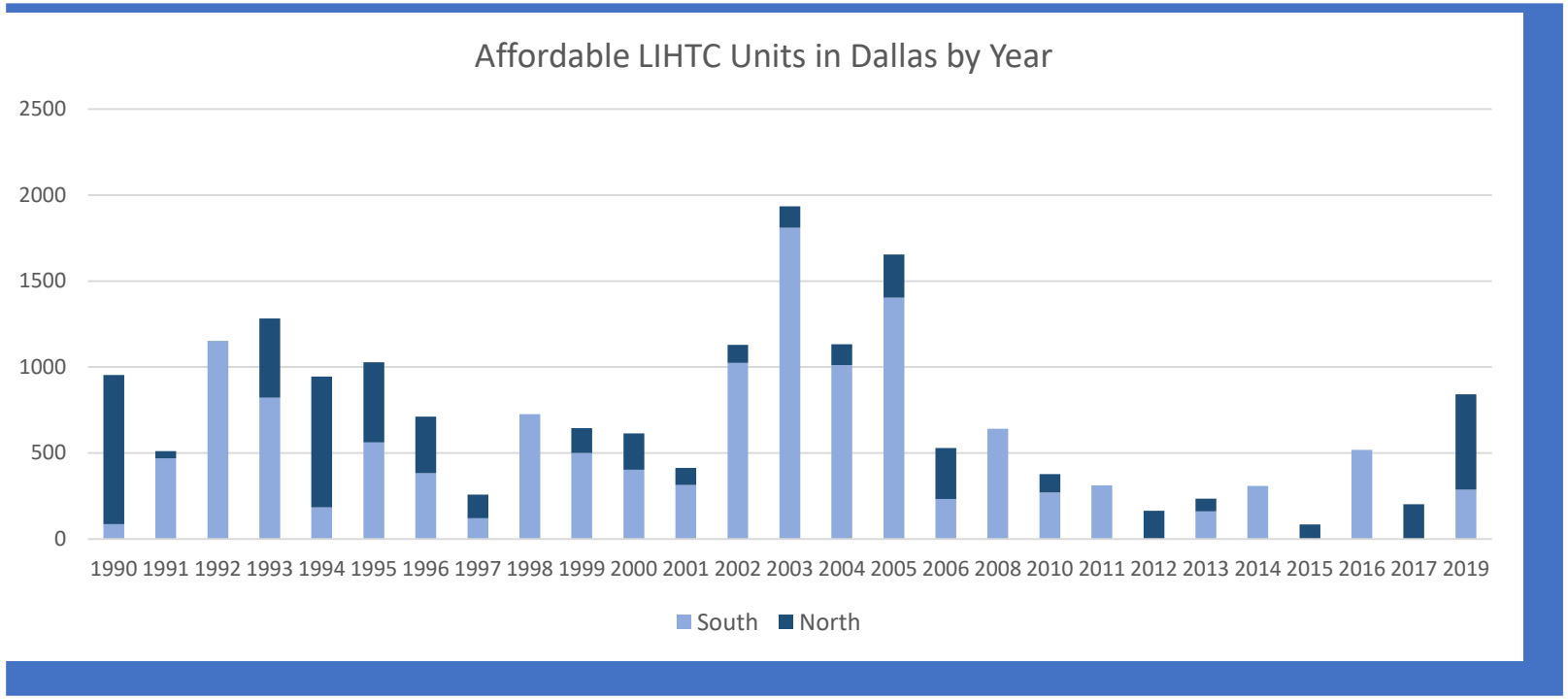
7. Create a dedicated revenue stream that is scaled to the magnitude of Dallas' affordable housing shortage

8. Expand and refine existing CHP programs to create a comprehensive, integrated strategy for preventing displacement during neighborhood revitalization

9. Use the CHP to mandate education for the city staff, policymakers, and the public about what racial equity means in the context of affordable housing and community development

Recommendations

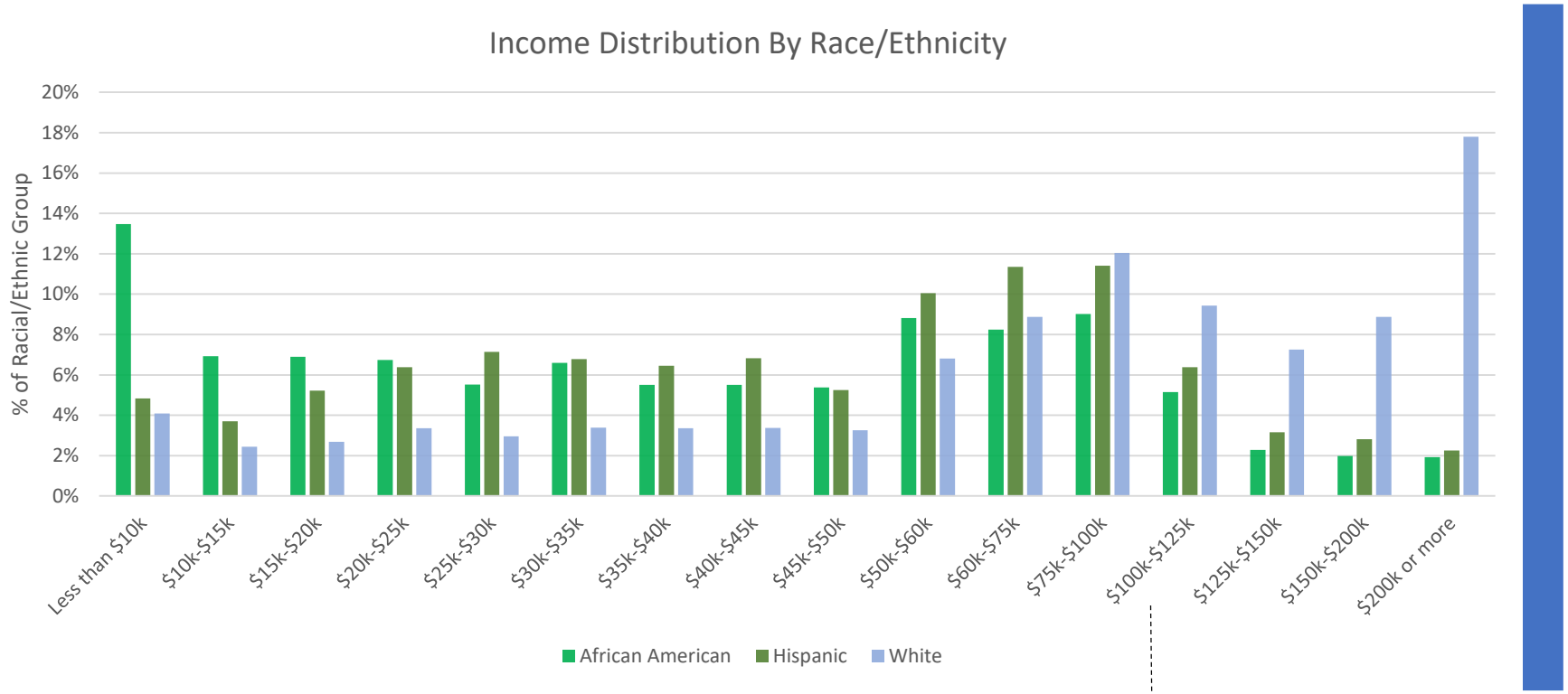
10. Strategically utilize Low Income Housing Tax Credit (LIHTC) financing in both high opportunity areas with low poverty rates and distressed areas with higher rates



Since 1990, LIHTC Developments have added more units to Dallas's southern side than in the northern districts, leading to concern and criticism from community stakeholders.

Recommendations

11. The CHP should help dispel myths about affordable housing that fuel NIMBYism



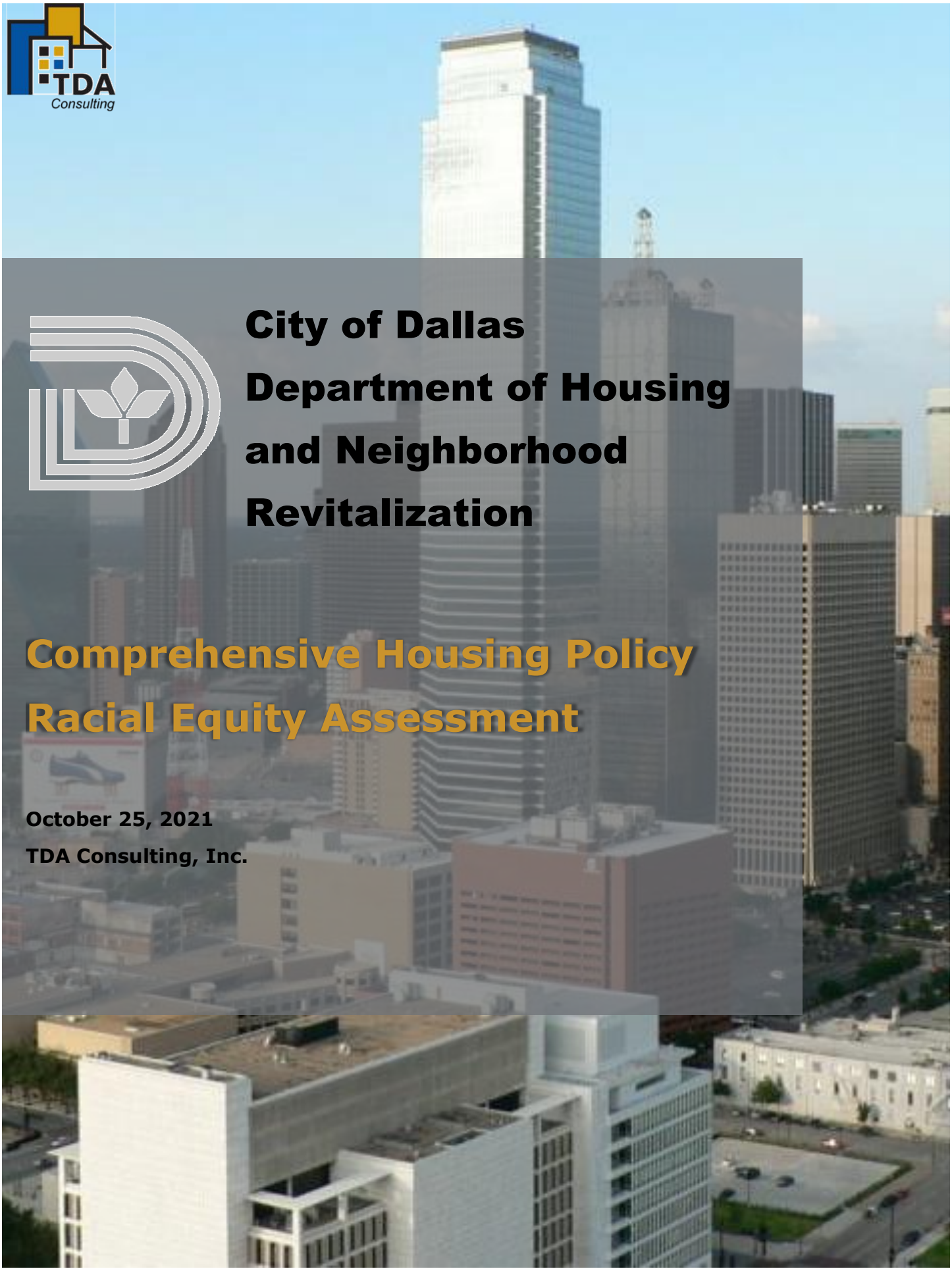
80% of African American households, 74% of Hispanic households, and 45% of white households earn below $75,000. Depending on household size, many of these households (left of the dotted line) may qualify for City of Dallas housing programs.

Comprehensive Housing Policy Equity Analysis

Housing and Homelessness Solutions Committee

November 9, 2021

John Gilvar
Christine Campbell
Michele Williams
TDA Consulting



City of Dallas Department of Housing and Neighborhood Revitalization

Comprehensive Housing Policy Racial Equity Assessment

October 25, 2021

TDA Consulting, Inc.

City of Dallas Comprehensive Housing Policy Racial Equity Assessment

Table of Contents

Introduction

Background

The Comprehensive Housing Policy (CHP) represents the City of Dallas's primary tool for combatting the local affordable housing crisis. The City Council adopted the CHP and created the Dallas Housing Policy Task Force to (1) create and maintain available and affordable housing throughout Dallas; (2) promote greater fair housing choices; and (3) overcome patterns of segregation and concentrations of poverty through incentives and requirements (Resolution No. 18- 0704, May 9, 2018). The policy outlines 13 discrete housing programs administered by the City of Dallas: the Home Improvement and Preservation Program, Dallas Homebuyer Assistance Program, DHAP Targeted Homebuyer Incentive Program, Accessory Dwelling Units, Home Improvement and Preservation Rental Program, Tenant-Based Rental Assistance, New Construction and Substantial Rehabilitation Program, Mixed-Income Housing Development Bonus, Land Transfer Program, Title Clearing and Clouded Title Prevention Program, Community Land Trust Program, Targeted Rehabilitation Program, and Neighborhood Empowerment Zones.

In the three years since the CHP's adoption, city officials and community partners have committed to tackling persistent racial inequities by taking aim at the higher barriers Black and Brown residents face in meeting a variety of basic needs, including affordable, safe, quality housing. The *2018 North Texas Regional Housing Assessment* and the *2019 Analysis of Impediments to Fair Housing Choice* (a.k.a. *The 2019 Fair Housing Study*) outline numerous disparities in housing outcomes that continue to impact Black and Brown Dallas residents. These disparities include significantly lower homeownership rates, much higher housing cost burden, much lower median property value, higher likelihood of living in substandard housing, and greater exposure to airborne toxins and other environmental hazards associated with industrial operations abutting residential neighborhoods. The *2019 Fair Housing Study* described "s*tark patterns of neighborhood inequities…within Dallas"* and called for "*coordinated and geographically targeted actions across City departments and agencies" to "address… this inequitable landscape of opportunity."*

Southern Methodist University Economics Professor J.H. Collum Clark specifically flagged the ongoing challenges of Southern Dallas[1] in a recent white paper about the Dallas Collaborative for Equitable Development, a mixed-income housing, and small business support initiative developed by the Texas Real Estate Council, Dallas College, Lift Fund, and Texas Mezzanine Fund. The paper describes these Southern Dallas challenges as the "elephant in the room" within discussions about how Dallas's race-based policy legacy continues to limit opportunities to

[1] Dr. Clark defines Southern Dallas as "9 of the city's city council districts, mostly south of Interstate 30, but including several low- to moderate-income areas just north of I-30 (including West Dallas / Census Tract 205).

Black and Brown residents some 50 years after Congress passed laws outlawing segregation and discriminatory housing practices. Professor Clark's analysis suggests that these challenges are part and parcel of what many historians have termed Dallas's North-South Divide. He notes, for example, that present-day Southern Dallas is home to more Black and Hispanic people than the total population of Washington, D.C., yet contains only 10% of Dallas's total property tax value as assessed for tax purposes. This large geographic area with 64% of Dallas's total population but only 10% of its property tax value evidences an inequitable landscape indeed.

The City Council, the City Manager, the city's Office of Equity, and many local partners continue to reckon with the historical policies that created this landscape. For example, the Council has adopted a process to increase equity in budgeting as part of a broad initiative codified on May 22, 2019, authorizing "a resolution in furtherance of the City of Dallas' efforts to support diverse racial, ethnic, cultural, and socio-economic backgrounds and to promote equity in the Dallas community." These efforts also include the Dallas Equity Indicators Project, which the city developed as a tool to support a "sustained commitment by multiple agencies" to "address disparities in social and economic outcomes for many groups" that have resulted from "decades of institutionalized policies and practices."

In early summer 2021, the City of Dallas Department of Housing and Neighborhood Revitalization contracted with TDA Consulting to analyze the ways that the CHP helps or hinders the city in meeting its racial equity goals. A team of consultants, Christine Campbell, John Gilvar, and Michele Williams, conducted the racial equity assessment outlined below from July through October 2021.

Assessment Approach and Research Questions

The consultant team approached this assignment using a root cause analysis lens. In other words, it started with analyzing the long-term root causes of the higher barriers to safe, quality, affordable housing experienced by Black and Brown residents of present-day Dallas. Research questions were informed by extensive discussions with a wide range of community stakeholders who provided a range of perspectives on the contours of the "landscape of inequitable opportunity" cited by the *2019 Fair Housing Study*. This stakeholder input provided a critical local perspective on current racial disparities in housing outcomes and helped the team understand the policy history in which these disparities are rooted.

The team's primary research questions were:

1. What are the current barriers to safe, quality, affordable housing disproportionately experienced by Black and Brown Dallas residents?

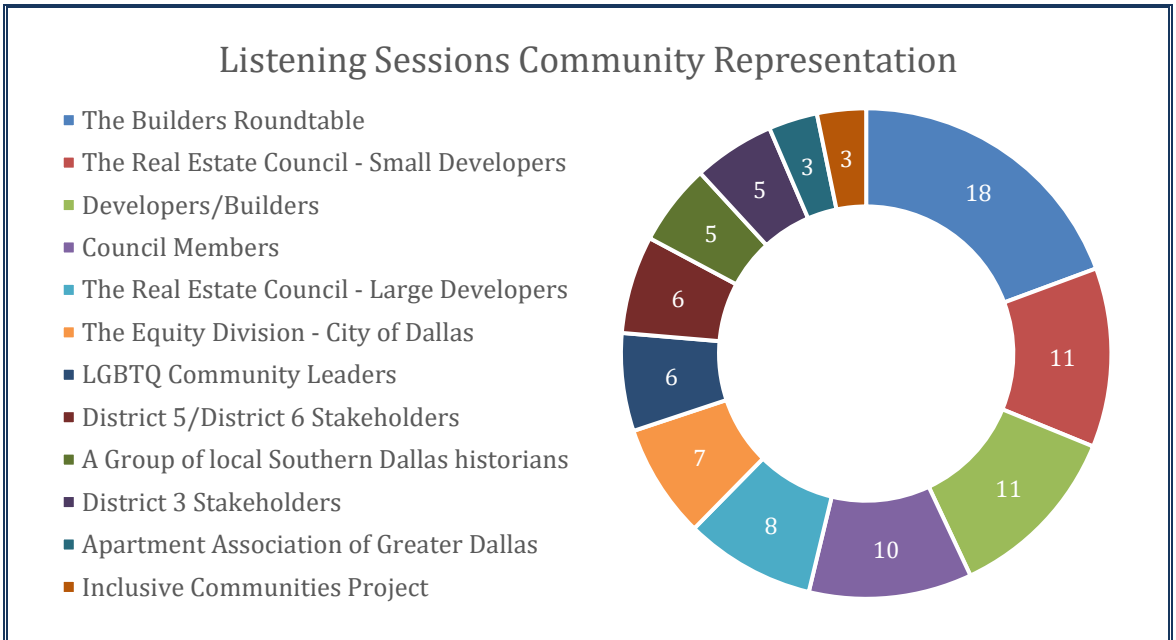
2. What are the historical root causes of these barriers, and how do these causes continue to shape the landscape of Dallas's affordable housing crisis?
3. How does the CHP empower or disempower city leaders to address these root causes by accelerating access to safe, quality, affordable housing in a way that reduces racial disparities and ameliorates Dallas's North/South Divide?

Assessment Process Outline

Using the Race Forward Framework as a guide, the team utilized a variety of methods to gather the information necessary to complete the assessment. These methods included:

- Interviews/listening sessions with relevant community stakeholders
- Tours of neighborhoods, including historically African American communities in Southern Dallas as well as recently redeveloped areas
    - Historic 10th Street District
    - The Bottom
    - The Forest District
    - South Dallas
    - West Dallas
    - Joppa
- Review of existing research on affordable housing challenges and local plans with affordable housing components
- Review of local historical accounts of race relations and race-based housing policies and practices
- Review of existing City of Dallas Housing Department data
- An in-depth interrogative review of the Comprehensive Housing Policy as currently written.

The community engagement process consisted of over twenty stakeholder listening sessions. The 93 participants included current and former City Council members, neighborhood activists, local historians, large and small developers and building contractors, a landlord association, the director and staff of the City of Dallas Office of Equity, and advocates for housing fairness and inclusion as well as LGBTQ rights. Participants were demographically representative of the diversity of the city in terms of race/ethnicity, age, gender, and sexual orientation. They represented communities across Northern and Southern Dallas, including areas most directly impacted by racial disparities in housing outcomes. Current Council members interviewed include Mayor Pro Tem West (D1), Council Member Moreno (D2), Council Member Casey Thomas (D3), Deputy Mayor Pro Team Resendez (D5), Council Member Atkins (D8), Council Member Blackmon (D9), Council Member Schultz (D11), Council Member Mendelsohn (D12), Council Member Willis (D13), and Council Member Ridley (D14).



The above chart shows the number of community members and stakeholders who contributed to the listening sessions by group or category.

Local plans, studies, and other documents reviewed include:

- *Dallas 5-Year Comprehensive Plan*
- *forwardDallas!* plan
- *Neighborhood Plus* plan
- *2019 Analysis of Impediments to Fair Housing Choice (2019 Fair Housing Study)*
- *2018 North Texas Regional Housing Assessment*
- *Budgeting for Equity* presentation to the Dallas City Council and evaluation tool
- Various reports, articles, and other research about Dallas housing issues referenced throughout this report.

Content and Structure of the CHP

The lion's share of the CHP (131 out of 148 total pages) is devoted to detailed descriptions of 13 housing programs, including an accounting of the rules and regulations that city staff use in administering these programs and 20 technical appendices. The CHP introduces this program-level administrative and technical information with a brief background section, starting with the City's goals of creating and maintaining available and affordable housing throughout Dallas, promoting greater fair housing choices, and overcoming patterns of segregation and concentrations of poverty. Additional background includes a brief description of the most recent Market Value Analysis (MVA), an outline of reinvestment strategy areas as defined by the MVA, affordable housing production goals, a high-level summary of the work of the Housing Policy Task Force, and a list of plans providing related information, including the *forwardDallas! Comprehensive Plan*, the *Neighborhood Plus Plan*, and *Consolidated Plan*.

Gaps in the CHP

As currently written and structured, the CHP represents a better guide to compliance with federal, state, and local regulations than it does an outline of strategies for changing the affordable housing status quo. To use a sports analogy, the document contains a great deal of detailed material about Defense (for example, avoidance of federal audit findings and lawsuits) and almost nothing about Offense (for example, how to coordinate strategies and build partnerships to maximize opportunities within the parts of the city where development costs are relatively low and affordable housing needs are off the charts).

The assessment team identified the following specific gaps in the CHP:

- No vision or strategies for how to reach either the high-level goals or the production targets
- No reference to how to coordinate the 13 discrete programs or leverage them with other local public or private housing initiatives
- No road map for comprehensive planning that addresses localized impediments to affordable housing development, for example, the significant differences, from one area of the city to another, in land acquisition costs, infrastructure needs, and zoning issues
- No evaluation framework with which the Council and public can measure progress in reaching overarching CHP goals
- No guidance on how city staff should nimbly adjust subsidy terms as market dynamics evolve and rapidly impact the viability of affordable housing development projects
- No goals tied directly to increasing equity by reducing racial disparities
- No acknowledgment of policies that have promoted segregation and inequality
- No specific strategies for redressing deep-rooted inequities by leveling the playing field for Black and Brown residents and historically Black and Brown communities
- Insufficient funding to achieve affordable housing production targets and advance equity in affordable housing access, as compared to cities such as Austin, Atlanta, and Seattle.[2]

These gaps result in numerous blind spots—approaches to increasing affordable housing that make it difficult for the City Council, city staff, and the public to focus on the elephant in the room and how to address it. These blind spots are outlined in detail later in the Advancing Equitable Impacts of this report.

Structure of this Report

The sections of this report that provide the analysis behind our recommendations are as follows:

[2] The section of this report titled Ensuring Viability and Sustainability provides detailed information pertaining to this gap.

- Racial Disparities in Housing Outcomes
- The Historic Root Causes of Current Racial Disparities
- Advancing Equitable Impacts
- Examining Alternatives and Improvements
- Success Factors
- Ensuring Viability and Sustainability

The analysis outlined in these sections underpins the consulting team's recommendations for how the CHP could be improved to better empower the City Council to:

1. Reduce stark racial disparities in Dallas's housing outcomes
2. Strategically address the root causes of these disparities, and
3. Accelerate access to safe, quality, affordable housing in a way that ameliorates Dallas's profound North/South Divide.

Using the Recommendations

Ultimately, the city's success will boil down to a limited number of critical choices its leaders must make if they are authentically committed to tackling its daunting array of housing disparities. The following three questions can best express these choices:

- **Will city leaders create a strategic road map that sets a course toward redressing the vast North/South divide?**
- **Will they acknowledge that a 150-year-old legacy of race-based policy choices has saddled Southern Dallas with an enormous deficit in the basic infrastructure upon which the development of mixed-income neighborhoods depends?**
- **Will they hold themselves accountable for leveling the playing field that has been tilted in favor of predominantly White areas to the North by making significant investments in Southern Dallas?**

These choices are necessary because moving forward in an equitable way will not come from tweaking the current policy document. Rather it requires expanding Dallas's affordable housing goals, making these goals measurable, and tying them to a comprehensive strategic roadmap toward the desired state.

This desired state will occur when neither the color of a person's skin nor their zip code predicts the chances of their living in safe, quality, affordable housing. The desired state reflects the Government Alliance on Race and Equity's definition of racial equity that the City of Dallas has employed for its Budgeting for Equity process. Progress will be made only when the Council can use its equity goals and a corresponding affordable housing strategic roadmap as oversight tools-- and when the public can use these same tools to hold the Council and city staff accountable.

Recommendations

The recommendations below address different ways to re-craft the CHP to make it a more powerful tool, not just for accelerating the production of affordable housing units, but for advancing racial equity in alignment with the City's overarching equity goals. These recommendations are oriented toward building the public will and accountability needed to eliminate dramatic racial disparities in access to safe, quality, affordable housing.

After each recommendation, a brief summary ties it to the consultant team's analysis. The summaries contain hyperlinks that connect to the parts of this report offering more detailed descriptions of our findings, including background information, analysis, and descriptions of success factors from other communities.

1. **Create a CHP vision statement articulating how the affordable housing playing field will be leveled for all racial groups and across the North/South Divide**

   This level playing field represents the desired state and is aligned with the city's overarching vision for increasing equity. As such, it needs to be front and center in the CHP, guiding the various strategies at the city's disposal for accelerating the production of affordable housing. This desired state will not be reached by merely avoiding public investment that risks exacerbating the concentration of poverty within historically redlined Southern and Western Dallas areas that has persisted over the decades since desegregation. It requires employing an array of proactive strategies guided by a vision for public investment in these marginalized areas to create vibrant, mixed-income neighborhoods. The vision statement would articulate a radical reversal of the broad policy patterns that over many decades promoted northward development while creating a Southern Dallas landscape marked by under-investment and neglect. It would also provide avenues for addressing the limitations of current strategies to move households struggling with housing affordability from historically segregated, high-poverty areas to areas that the MVA deems "high opportunity zones" with lower poverty rates, superior schools, transit options, and other infrastructure.

2. **Create a comprehensive, whole-city strategic road map for coordinating the CHP's array of tools while also leveraging community partnerships to address the very different needs for change from one area of the city to another**

   City staff currently lack a strategic road map guiding how it should leverage CHP programs in partnership with community-based and private developers to affect the different types of change needed in different areas of the city. The City of Austin's

Strategic Housing Blueprint may provide a model for addressing this issue. Adopted by the Austin City Council in 2017, the blueprint represents a 10-year plan to help align resources and facilitate community partnerships around a single, strategic vision to create 60,000 affordable housing units for those making less than 80% of the median family income and ensure that there is affordable housing throughout the city. It outlines a multifaceted set of coordinated strategies to leverage different resources to maximize the production of new affordable units while mitigating the displacement of residents as neighborhoods gentrify.

A similar approach could prove critical to outlining different approaches for addressing the very different challenges to increasing access to safe, quality, affordable housing in Southern versus Northern Dallas. For example, Southern neighborhoods are much more susceptible than Northern neighborhoods to gentrification that displaces long-time Black and Brown residents. Southern Dallas, therefore, requires proactive and highly targeted strategies to induce mixed-income development at sufficient scale and speed to create a hedge against displacement. It also requires the flexibility to expand and refine successful CHP programs developed to assist long-time residents of Southern neighborhoods in remaining in their houses despite rising property taxes. Likewise, Northern Dallas's much higher land prices necessitate different area-specific targeted strategies, such as higher subsidies and other methods of inducing private developers to create more affordable housing, including workforce housing.

3. **Establish SMART (Specific, Measurable, Achievable, Relevant, Time-Bound) goals for the CHP that point to the desired state**

The CHP's goals of creating and maintaining available and affordable housing throughout Dallas, promoting greater fair housing choices, and overcoming patterns of segregation and concentrations of poverty all point *in the general direction* of the increased equity. Yet, as currently written, they offer no framework for measuring concrete progress. Without greater specificity and a connection to measurable outcomes, how can the City Council hold city staff accountable? Further, how can the public hold the Council accountable?

In other communities, SMART goals grounded in a clear vision statement have proven instrumental in increasing accountability to produce concrete results. SMART goals have also increased accountability to agreed-upon equity-based strategies. In Dallas, the City Council might establish a SMART goal calling for specific, measurable, time-bound progress on bringing the median property value of Black and Brown homeowners in line with the median property value of White homeowners. Another might specify targets and timelines for subsidized workforce housing units within Northern and other areas of the

city where median rents and house prices are currently beyond the reach of working people. These or other SMART goals would provide elected officials with:

A. A mechanism with which to align affordable housing planning with equity-based planning in other city departments/divisions, such as the Office of Equity and the Office of Environmental Quality, and other public agencies, such the DART or DISD

B. A framework to guide continuous community engagement, thus helping to ensure that the evolution of the recommended strategic road map reflects input from a wide array of community stakeholders, including the private developer community and people who live and work in historically marginalized areas

C. A way to hold city staff accountable for results without micromanaging the way it administers programs or leverages external resources and partnerships to meet the Council's goals

D. A clear basis for voting to approve proposed projects and initiatives that align with the Council's affordable housing strategic road map but meet with constituent opposition grounded in NIMBYism.

4. **Strengthen linkages between the CHP and neighborhood revitalization strategies that leverage infrastructure improvements, economic revitalization, and mixed-use master planning to build a foundation for increasing generational wealth in historically Black and Brown communities**

Strategically developing mixed-income neighborhoods can promote the health and wellbeing of residents in various ways and can also help improve economic opportunities in historically marginalized areas. Leveraging various public and private initiatives can facilitate such development by increasing workforce housing stock and attracting grocery stores to areas that are currently food deserts. This approach lies at the heart of the Dallas Collaborative for Economic Development, which brings for-profit and nonprofit organizations together to facilitate mixed-income housing development and provide small business support in targeted areas of Southern and Western Dallas. The current redevelopment work in The Bottom provides an example of how public investment in infrastructures like flood mitigation and street lighting can be creatively combined with support to small developers and contractors with roots in historically marginalized areas.

Stakeholder input from multiple listening sessions suggests that the city has barely scratched the surface in tapping the expertise, capacity, and motivation of both nonprofits

and private contractors to increase infill and rehab development in areas sorely in need of high-quality workforce housing options. The CHP should outline a flexible role for staff in leveraging a variety of incentives and supports to accelerate such development across Southern Dallas. In addition, the CHP should guide staff in supporting master-planned mixed-use projects in historically marginalized areas. The recent Redbird Mall revitalization illustrates how development can succeed in attracting employers, new retail, and housing to areas of Southern Dallas that the Market Value Analysis all but writes off.

5. **Add a CHP goal around remedying the enormous infrastructure deficit that has persisted in Southern Dallas for generations**

   Dallas's legacy of race-based policies and practices, which date back to the post-Civil War era, has left wide swaths of Southern Dallas without the necessary infrastructural foundation for mixed-income neighborhood development. In listening sessions, the assessment team learned that in one Council district alone, there are over 25 areas that have yet to be connected to the city sewer system and where all dwellings remain on septic tanks. Many areas have completely inadequate roads, insufficient flood control measures, and poor or non-existent street lighting. No equity-centered affordable housing strategy will succeed without a sufficient investment of public funds to remedy this situation and thereby create market conditions that make mixed-income development more viable. Investing in Southern Dallas at the necessary scale will require the City Council to recognize the need for greater investment in some districts than in others in its budget-setting process. In other words, it will require utilizing an equity-based, rather than an equality-based paradigm, as outlined in the section of this report titled Advancing Equitable Impacts.

6. **Utilize an "All 14 Districts" model to combat ubiquitous NIMBYism across all areas of Dallas**

   The District of Columbia developed a successful model for ensuring that all 8 of the Council wards within the city hit specific benchmarks specified in the city's homelessness strategic road map. As outlined in the section of this report titled Examining Alternatives and Improvement Section, this model can be adapted in formulating Dallas's affordable housing strategic roadmap.

7. **Create a dedicated revenue stream that is scaled to the magnitude of Dallas's affordable housing shortage**

From Atlanta to Seattle, cities facing growing affordable housing crises have linked comprehensive strategic housing plans with new mechanisms for generating local revenue to follow through on these plans. In early 2021, the Atlanta City Council approved legislation that will enable the city to deploy $100 million in new housing opportunity bond funding. In 2016, Seattle voters signed on to a $290 million property-tax levy for low-income housing, with 68% voting in favor. Closer to home, Austin, Texas approved a $250 Million Affordable Housing Bond in 2018, with approval from 73% of residents who voted.

These funding initiatives and others across the country centered the goal of increasing affordable housing equity. Like Dallas, these cities have seen greater and greater numbers of working people, particularly people of color, priced out of neighborhoods within reasonable commuting distance of employers paying a living wage. They've also seen the widespread displacement of Black and Brown residents from neighborhoods experiencing rapid gentrification. The level of local public funding dedicated to affordable housing development in these communities now dwarfs the level in Dallas, however. While Dallas has many tools in its CHP toolkit, it will be unable to reverse its own worsening housing crisis without the investment of dedicated local funds at a scale that matches the enormity of the problem.

8. **Expand and refine existing CHP programs to create a comprehensive, integrated strategy for preventing displacement during neighborhood revitalization**

CHP programs such as Home Improvement and Preservation have proven effective in allowing long-time residents of neighborhoods threatened by gentrification to maintain their homes while mitigating the higher tax burden that comes with home improvements and rising property values. Yet the scale and capacity of these programs must be increased significantly to meet the level of unmet need. For example, city staff reports that the level of demand for assistance with home repairs by far exceeds the number of households assisted. This and other CHP programs offering some protection from displacement have proven inadequate to address the scope of the problem. The capacity of rehabilitation assistance programs should be expanded, and the CHP should expand its displacement strategies altogether to better address needs such as:

A. Tax relief related to the school district and other taxes not currently addressed
B. Increased employment opportunities
C. Public transportation
D. Food security
E. Quality education
F. Green and recreational space

9. **Use the CHP to mandate education for the city staff, policymakers, and the public about what racial equity means in the context of affordable housing and community development**

   For the CHP to move Dallas toward more racially equitable outcomes, it must be amended to remove its many equity blind spots, as outlined in the section of this report titled Advancing Equitable Impacts. The process for eliminating these blind spots requires policymakers to be grounded in the meaning and benefits of equity. This grounding will help them to build public trust in the authenticity of their efforts to increase affordable housing equity. In turn, this trust will prove critical to overcoming widespread skepticism stemming from the number of past plans that have called for extensive community input yet have not progressed to implementation. Developers and neighborhood advocates alike need greater transparency. They also need a framework for understanding the Return-on-Investment for the entire community of increasing equity across the affordable housing landscape.

10. **Strategically utilize Low Income Housing Tax Credit (LIHTC) financing in both high opportunity areas with low poverty rates and distressed areas with higher rates**

    Lawsuits, court orders, and federal findings about Dallas's history of concentrating subsidized affordable housing development in historically marginalized low-income areas with large Black and Brown populations explain why the city takes such a careful approach to approving LIHTC proposals.[3] The CHP's approach to increasing affordable housing stock while minimizing further concentrations of poverty entails placing subsidized affordable housing development in areas of the city classified by as "high opportunity areas" where the poverty rate is less than 20%. As the CHP was being developed, many argued that it should direct the city to use LIHTC to help people living in historically segregated areas with high poverty to move to these high opportunity areas.

    Yet the scale of the housing affordability barriers for Black and Brown Dallas residents is massive; 80% of African American households and 74% of Hispanic households in Dallas earn below $75,000, and thus, depending on household size, may qualify for City of Dallas housing programs[4]. The scale of the problem demands a more nuanced, whole-city LIHTC strategy. Writing off wide swaths of Southern Dallas because of higher poverty rates ignores the leverage LIHTC can provide to help catalyze broader

[3] The Walker Consent Decree, the Inclusive Communities lawsuit, HUD findings, and ongoing criticism about the siting of affordable housing developments all contribute to this caution.
[4] These statistics were provided to the consultant team by the City of Dallas Housing Department

development of workforce housing, retail, office and other uses that can revitalize neighborhoods. Moreover, market forces, such as the high cost of land, make the placement of sufficient numbers of affordable units in high opportunity areas challenging, as the Housing Department has indicated to the City Council.

While the CHP must guard against using LIHTC to further concentrate poverty and encourage siting viable LIHTC projects in Northern Dallas and other areas with lower poverty rates, it should also provide city staff with greater flexibility to nimbly support the leveraging of LIHTC funds throughout Dallas, regardless of the MVA. Otherwise, the city's rejections of LIHTC proposals in Southern and Western Dallas will continue to sow confusion within the developer community about how to gain support for proposals in these areas that could help the city achieve the goals of the CHP.

11. The CHP should help dispel myths about affordable housing that fuel NIMBYism

NIMBYism often has its roots in myths about what affordable housing means and what it does to neighborhoods and communities. The CHP should include myth-busting strategies that will help boost the approval rate for worthy affordable housing proposals that align with the goals of the CHP. Examples of common myths and myth-busting strategies include:

> Myth: Affordable housing only benefits the very poor; everyone else pays.
>
> Reality: Affordable housing in Dallas should address the needs of those earning less than 80% of AMI. For a family of four, this amount equates to $70,000 per year. Some people impacted by a lack of affordable housing include employers, seniors, low-income people, immigrants, low-wage or entry-level workers, firefighters, police officers, military personnel, and teachers. The lack of affordable housing depresses the tax revenues needed to improve roads, schools, or air quality. It means businesses struggle to retain qualified workers and lowers the amount of money available to spend in those businesses. Affordable housing isn't about doing something to help the poor; it's about improving business and raising the standards of working- and middle-class families and the nation at large. [5]
>
> Myth: Affordable housing drives down property values

[5] **MythsStereotypes even more improved: http://www.bpichicago.org/documents/MythsStereotypesevenmoreimproved.pdf?fun_cid=15777222901657857800**

Reality: According to the National Low Income Housing Coalition, 85% of affordable housing meets or exceeds federal quality standards, and over 40% of this housing is considered "excellent." That means affordable housing is likely either on-par with its surrounding neighborhood or in even better condition than its neighbors.

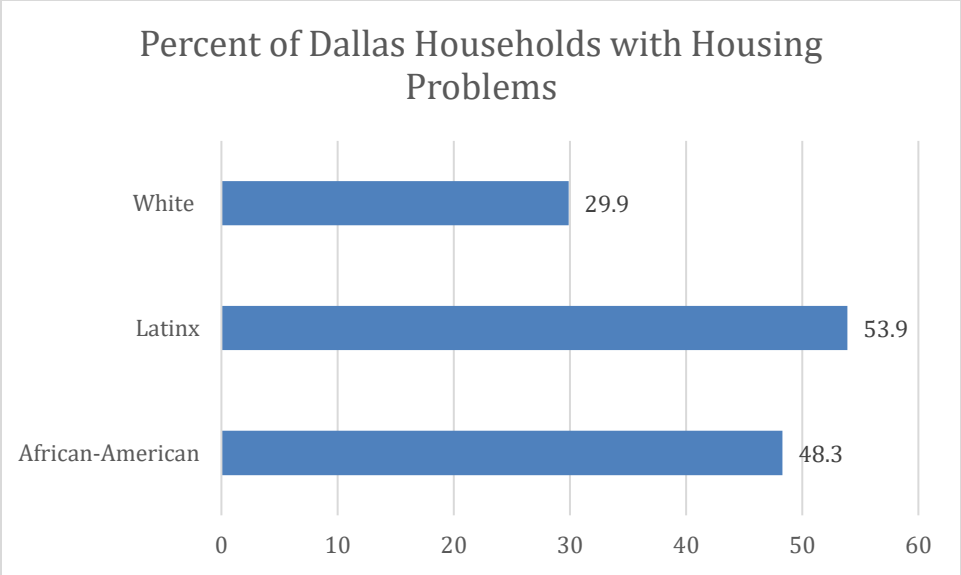
Myth: Affordable housing brings increased crime
Reality: There are no studies that show affordable housing brings crime to neighborhoods. In fact, increasing the number of families who own their own homes adds stability to a neighborhood and lowers the crime rate. In addition, increasing homeownership increases neighborhood cohesion and encourages cooperation in ridding communities of criminal activity. Families who live in affordable housing seek the same thing every family does – a safe place to raise children and the opportunity to enhance the value of what they own.

Racial Disparities in Housing Outcomes

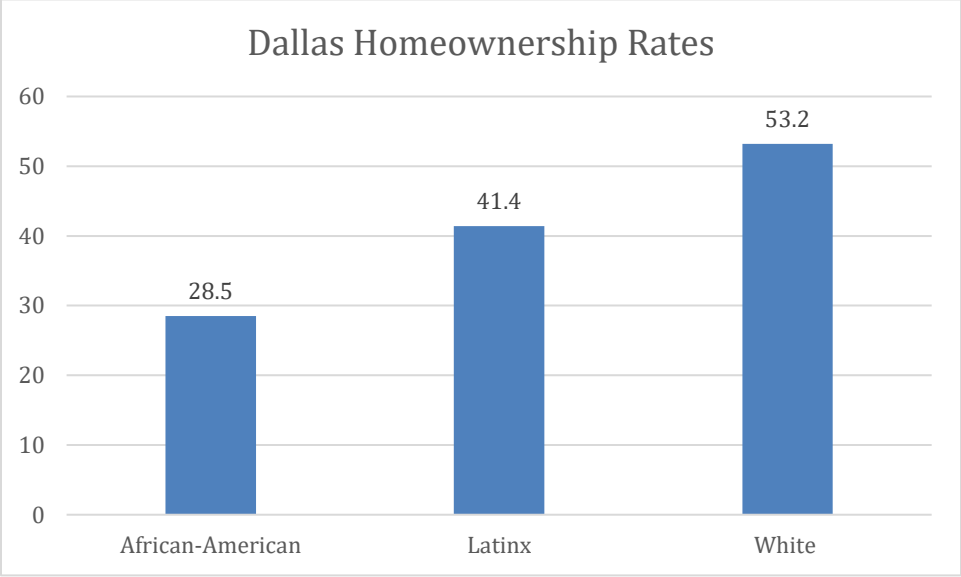
The most glaring disparities most pertinent to this equity assessment mirror those experienced by Black and Brown people in urban communities across the nation, from Boston to San Diego. These disparities directly connect to increased household vulnerability to rapidly escalating rents and home prices. They include:

- Significantly higher rates of housing problems, defined as households experiencing one or more of the following: housing cost burden (paying more than 30% of income for monthly housing costs, including utilities), overcrowding (more than one person per room), lacking a complete kitchen, or lacking plumbing[6]

[6] https://dhantx.com/wp-content/uploads/2019/03/North-Texas-Regional-Housing-Assessment-2018.pdf

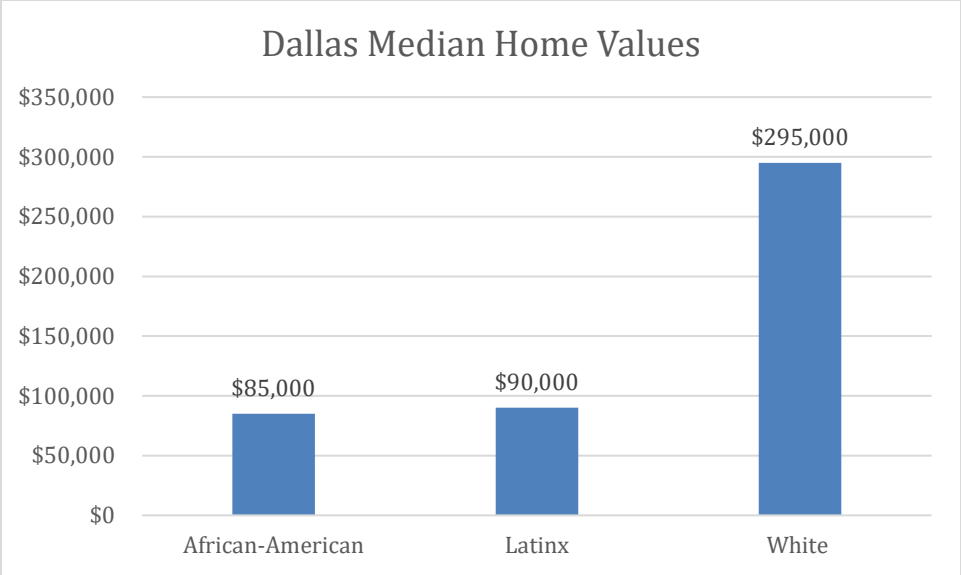


- Significantly lower homeownership rates[7]

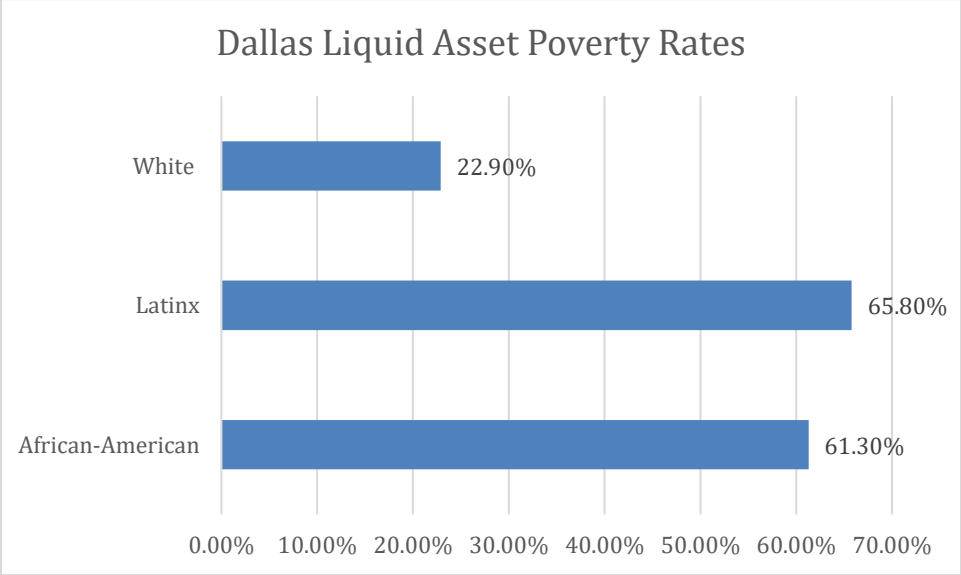


[7] https://prosperitynow.org/sites/default/files/resource/2018-10/Racial_Wealth_Divide_in_Dallas.pdf

- Significantly lower median home values[8]

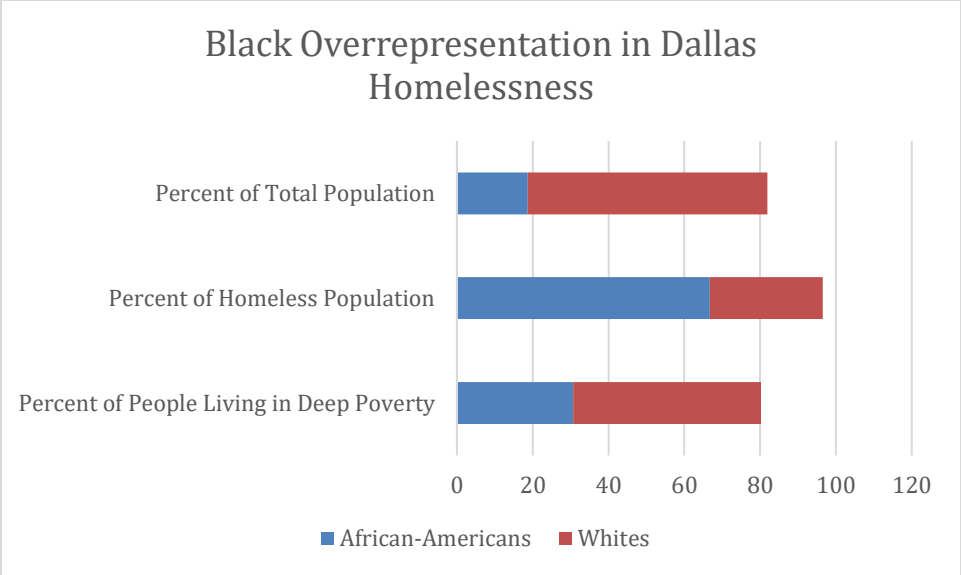


- Significantly higher rates of liquid asset poverty, defined as lacking savings to make ends meet for three months at the poverty level if a household's income is interrupted[9]



[8] https://prosperitynow.org/sites/default/files/resource/2018-10/Racial_Wealth_Divide_in_Dallas.pdf
[9] https://prosperitynow.org/sites/default/files/resource/2018-10/Racial_Wealth_Divide_in_Dallas.pdf

- Significant overrepresentation of African Americans in the local homeless population[10]



These disparities relate closely to other factors exacerbating financial vulnerability and making market-rate housing inaccessible for many Black and Brown residents of communities with rising housing costs. For example, according to a Harvard University study, the typical white American family has roughly ten times as much wealth as the typical African American family and the typical Latino family. Other studies have tied this dramatic disparity to the struggle of families of color to build home equity because historic redlining and other discriminatory housing practices depressed homeownership rates and median home values. Researchers have argued that such factors help explain why the overrepresentation of Black people in the homeless population is so much larger than the overrepresentation of Black people among people living in deep poverty. They suggest that focusing solely on addressing income disparities will not lead to housing equity.

The Historical Causes of Current Racial Disparities

The Policy Roots of Inequity: A Legacy of Exclusion, Relegation, and Neglect

Any racial equity assessment of policies designed to increase access to affordable housing requires understanding the historical root causes of the higher barriers to affordable housing experienced by communities of color. We must also strive to understand how these root causes continue to perpetuate disparities. This kind of analysis starts with reviewing policy choices made by city leaders over the course of Dallas's history that fostered these disparities and

[10] https://www.dallasobserver.com/news/black-people-far-more-likely-than-whites-to-be-homeless-11981745

continue to sustain them. The long shadow that these historical policies casts on present-day Dallas emerged as a central theme of the listening sessions the consultant team held with Dallas stakeholders. Participants talked about the historical use of redlining, eminent domain, and other policies and practices that explicitly displaced Black and Brown residents from their homes and neighborhoods and excluded them from living in areas where the city invested significantly in the infrastructure that created economic opportunity and wealth.

The *2019 Fair Housing Study* shares examples of "local, state and federal policies that mandated segregation and inevitably shaped the landscape of housing and opportunity for generations to come" in Dallas and other communities across the nation. These examples include:

- Redlining: The Federal Housing Administration, established in 1934, furthered segregation by refusing to insure mortgages in or near African American neighborhoods.

- Zoning laws: Neighborhoods that once had African American residents were rezoned to permit industrial and toxic uses. Those rezonings turned those neighborhoods into slums.

- Government regulations: The Underwriting Manual (1946) of the Federal Housing Administration:
    - Recommended that highways would be a good way to separate African Americans from white neighborhoods.
    - Stated that "incompatible racial groups should not be permitted to live in the same communities."
    - "Properties shall continue to be occupied by the same social and racial classes."

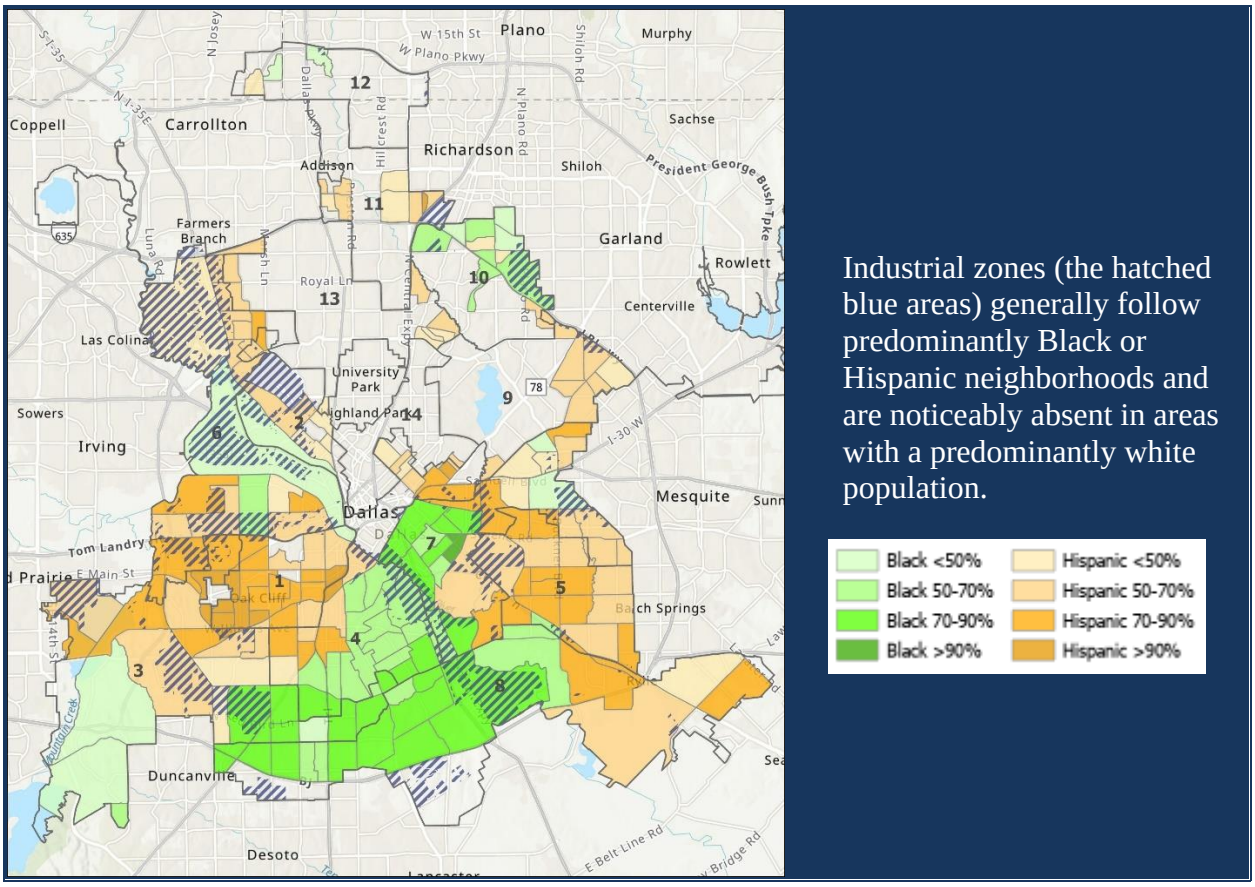
- "Appraisers are instructed to predict the probability of the location being invaded by . . . incompatible racial and social groups."

- Loss of equity generation and appreciation: African American families who were forbidden to buy homes in suburbs from the '40s to the '60s were prevented from accruing equity, which could have been passed to their children.

- Public housing to be predominantly black and poor: White and black families lived in separate public housing projects. The subsidized development of white-only suburbs led to the depopulation of public housing of white families, leaving housing authorities.

When legal means failed to exclude upwardly mobile middle class and professional people of color, vigilante groups took matters into their own hands and terrorized families who moved into predominantly White neighborhoods. Often unchecked by law enforcement and the criminal justice system, these terror tactics were common in many communities; in Dallas, they included a string of bombings in the 1940s and 1950s.

Award-winning Dallas journalist Jim Shutze chronicled these bombings and the policy shifts made by city leaders in their aftermath in his 1986 book *The Accommodation*. The book outlines how these leaders established segregated single-family developments for upwardly mobile Black households as an alternative to having them move into White neighborhoods. It also describes in detail how city leaders intentionally concentrated poorer Black families in neighborhoods that they then proceeded to neglect, relegating these families to areas prone to flooding and other hazards, passing zoning allowing for heavy industry alongside their dwellings, and shutting them out of the massive investments in infrastructure that helped bring prosperity to White areas of the city.



With substandard infrastructure, these areas became less and less attractive to market-rate developers and, as a consequence, have, over the past 50+ years, seen large pockets remain entirely undeveloped, despite economic and real estate booms that have fueled massive development in far northern Dallas and suburban areas.

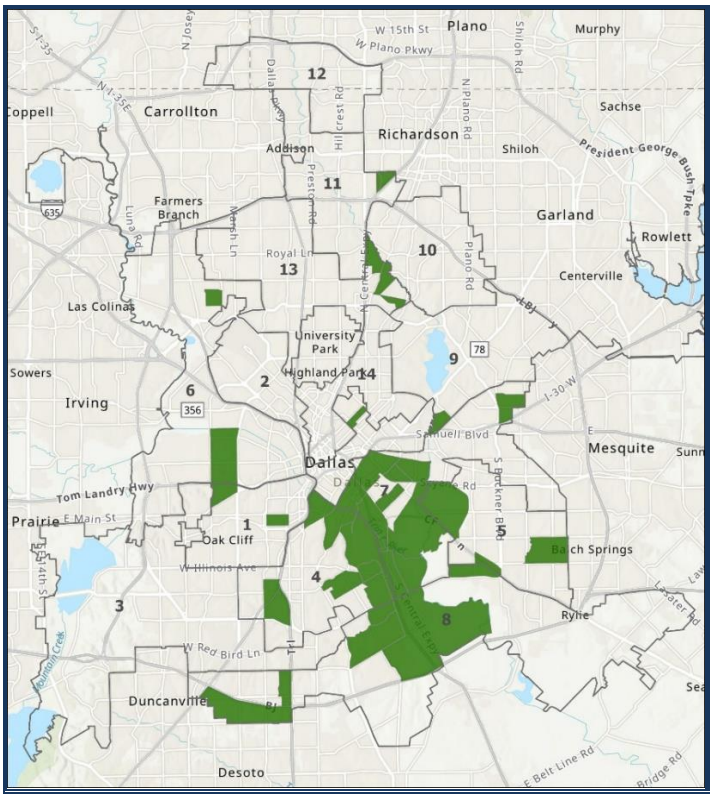
Much of the research on the relegation of communities of color to segregated, undesirable, and hazardous areas in U.S. cities focus on African-American communities, but Latinx residents were also excluded from areas with better housing and economic opportunities. Moreover,

because of redlining and widespread housing discrimination over several generations, Latinx people were more likely to settle in marginalized areas.

Despite the passage of federal civil rights laws that ended practices like redlining and led to mandated desegregation in the mid-20th century, city policy choices continued to concentrate low-income communities of color in areas south of the Trinity River. They also focused on the development of subsidized housing for low-income households in Black and Brown neighborhoods in Southern Dallas, which hastened the flight of Black and Brown middle class and professional people to the suburbs offering better schools and economic opportunities, and housing. The few thriving middle class and mixed-income neighborhoods in the area were hollowed out, unable to support local businesses owned and operated by members of the Black and Brown communities.

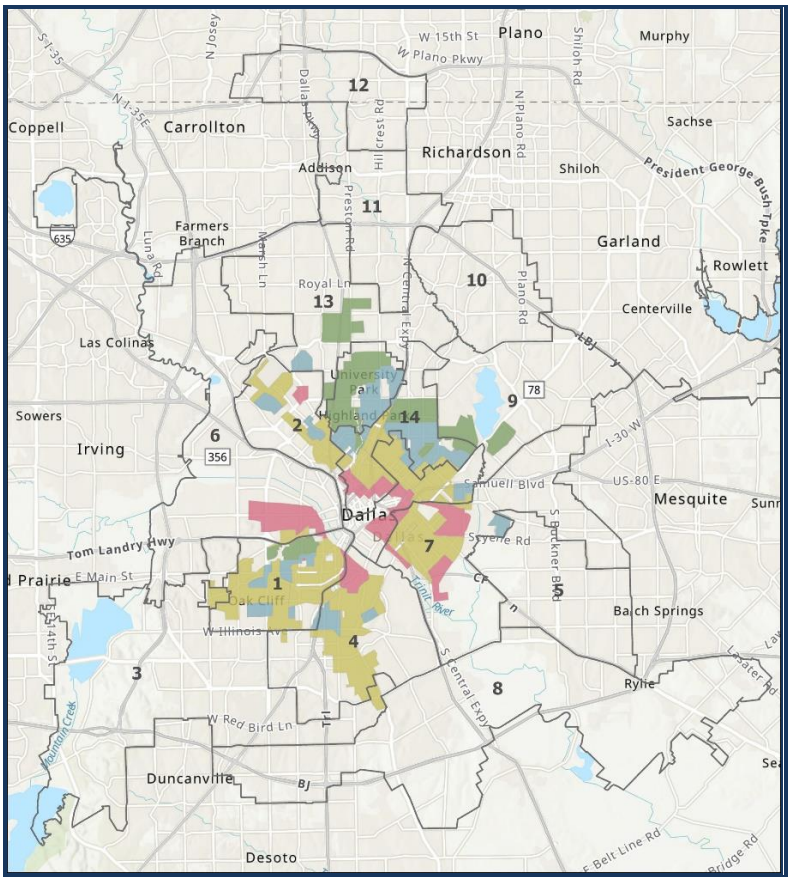
> *"Challenges include ...not enough emphasis on the historical data. We need to understand the stories and values of the people. We have to understand the millions of dollars spent that has kept white people in housing." Dallas City Council Member Schultz*

Over the past twenty years, the legacy of policy choices stretching back to Reconstruction has continued to shape the contours of Dallas's housing landscape. The proliferation and persistence of Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) provides an example. The U.S. Department of Housing and Urban Development (HUD) defines R/ECAPs as areas in which: (1) the non-white population comprises 50 percent or more of the total population and (2) the percentage of individuals living in households with incomes below the poverty rate is either (a) 40 percent or above or (b) three times the average poverty rate for the metropolitan area, whichever is lower. According to the *2016 North Texas Regional Housing Assessment*, the number of R/ECAPs in Dallas doubled between 1990 and 2016, with persistent patterns in Southern and Western parts of the city. The study also found that two-thirds of the 1990 R/ECAPs retained their designation.



R/ECAP areas are heavily concentrated in southern Dallas surrounding the redlined areas once labelled "Hazardous" by real estate agencies.

On one level, understanding the present-day impact of the historical legacy of race-based displacement, exclusion, and neglect is as simple as overlaying a map showing current R/ECAPs on top of redlining maps used by realtors and lenders in the 1930s. The close alignment between the current R/ECAPS and the neighborhoods south of the Trinity River set aside through redlining to contain Black and Brown residents tells the story of just how challenging it has been for the City of Dallas to reverse the effects of policies that denied people of color economic and housing opportunities over the course of many generations.

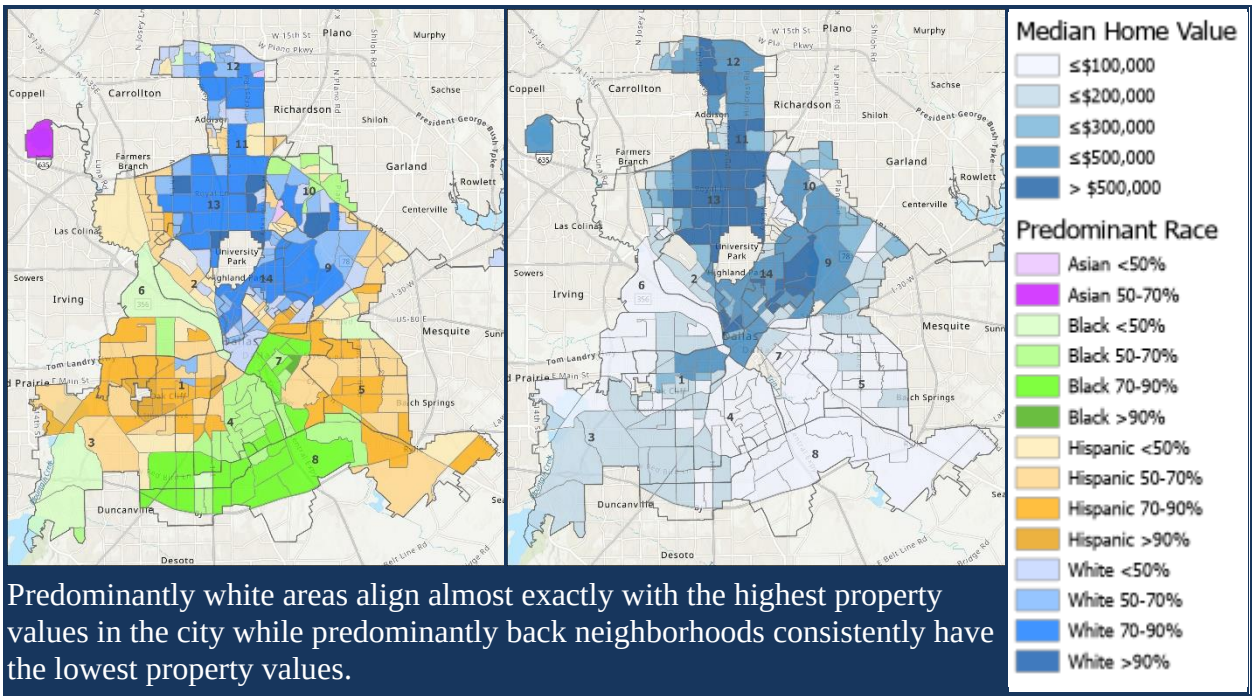


The FHA deemed significant areas of Dallas as being declining or at risk solely due to the concentration of African American households living there. Many of these areas are still racially concentrated and struggling with disinvestment and blight today.

The Elephant in the Room

Southern Methodist University Economics Professor J.H. Collum Clark refers to the ongoing challenges of Southern Dallas[11] as the "elephant in the room" in his description of how Dallas's race-based policy legacy continues to deny opportunities to Black and Brown Dallas residents some 50 years after Congress passed laws outlawing segregationist and discriminatory housing practices. In a recent white paper, Dr. Clark notes that "Southern Dallas...contains approximately 64% of the city of Dallas's population... has an area physically larger than the city of Atlanta,…[and a] Hispanic and Black populations amounting to 618,000 people in 2010--more than the total populations of Washington, Boston, or Seattle." Yet it "contains...only 10% of the total property value [within the Dallas city limits], as assessed for property tax purposes." Although the area has experienced moderate population growth since 2010, "the number of housing units and jobs in the area has declined over the same period."

[11] Dr. Clark defines Southern Dallas as "9 of the city's city council districts, mostly south of Interstate 30, but including several low- to moderate-income areas just north of I-30 (including West Dallas / Census Tract 205).



Predominantly white areas align almost exactly with the highest property values in the city while predominantly back neighborhoods consistently have the lowest property values.

Dr. Clark continues:

> *"Even in this century, historical patterns of neglect and under-investment have continued. Southern Dallas has seen very little new housing development, either in the market rate or subsidized segments of the market. The number of Community Housing Development Organizations has declined from a peak of 20 a decade ago to four today. The City of Dallas has been able to allocate only very modest capital to affordable housing and has further restricted public sector investment in Southern Dallas as part of a policy to avoid "concentrating poverty" in long-time low-income neighborhoods."*

Even today many residential areas of Southern Dallas remain disconnected from the city's sewer system, lack adequate roads, are prone to flooding, and have zoning that has allowed heavy industrial development to flourish right up against long-time Black and Brown residential neighborhoods. Families in Southern Dallas who manage to improve their economic lot continue to move away as a result, often to suburbs outside the city limits, so that the next generation can access the educational and other infrastructure that will make the path to prosperity less difficult. In turn, this ongoing flight of upwardly mobile Black and Brown households tends to perpetuate cycles of neighborhood poverty.

In contrast, the predominantly White and dramatically more prosperous areas of Northern Dallas have a considerable head start due to far greater levels of public investment in infrastructure that boosts economic opportunity. Examples include schools, roads, public transportation, and development that attracts high-paying employers, lenders, and other economic drivers. For the most part, these areas have not made room for working, disabled, or any other people who

struggle to afford market-rate housing in these areas, a group in which Black and Brown Dallas residents are grossly overrepresented.

Some neighborhoods south of I-30 have seen significant public and private investment in infrastructure in recent years, but these neighborhoods have also witnessed the displacement of numerous Black and Brown households as rents and property values have risen precipitously. These displaced households include working people and seniors living on fixed incomes. As Dr. Clark points out in his white paper, this dynamic adds another layer of complexity to seeding the development of mixed-income neighborhoods in Southern Dallas.

Challenges to Progress and Worsening Inequities

Studies completed over the past five years indicate that Dallas has made little progress in reversing long-term housing inequities and that barriers to affordable housing for Black and Brown residents are in fact growing worse. For example,

- *The City of Dallas Equity Indicators 2019 Report* states:

  > "*Decades of disinvestment in Black and Hispanic neighborhoods have culminated in substantial differences in basic housing conditions, neighborhood quality, and access to amenities. The indicators in this theme demonstrate deep disparities along racial/ethnic lines, particularly in Access to Housing and Housing Affordability and Services—disparities that have worsened since the baseline year." [12]*

- The Urban Institute ranks 274 American cities according to their degree of inclusion. These rankings address "overall inclusion," which reflects the ability of historically excluded populations to contribute to and benefit from economic prosperity. In 2016 it ranked Dallas 272nd out of 274 on overall inclusion, 270th out of 274 on economic inclusion, and 246th out of 274 on racial inclusion.[13]

- A 2018 economic opportunity assessment of Dallas County conducted by the Center for Public Policy Priorities documented a growing divide in the economic opportunities available to its residents and increased difficulty for the lowest income residents, who are far more likely to be people of color, to pull themselves out of poverty.

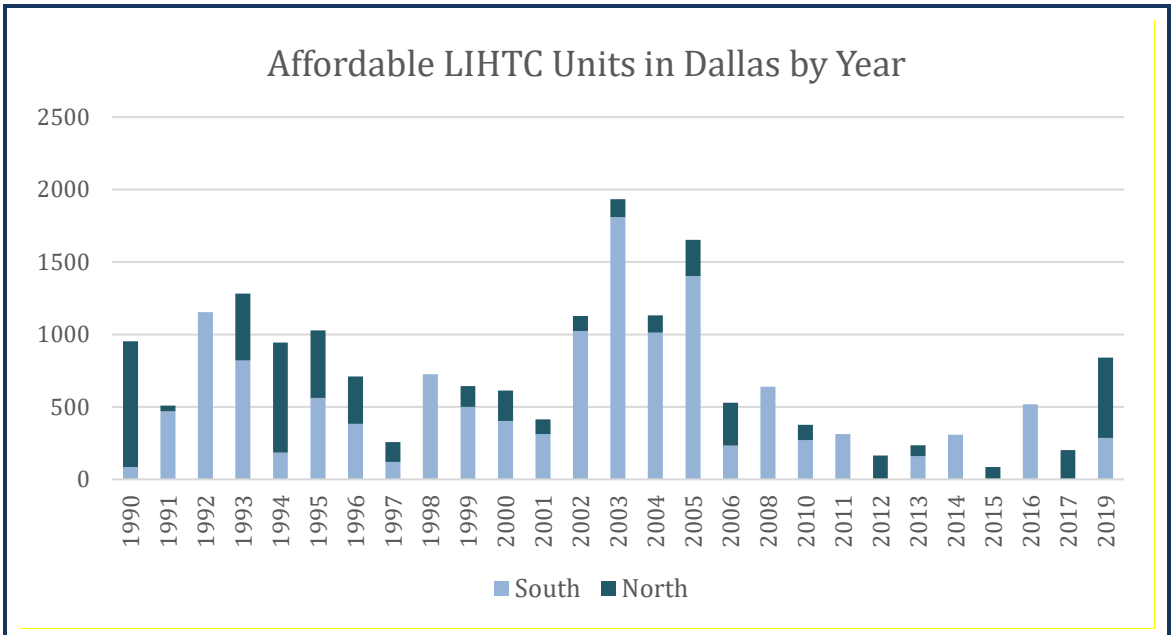
[12] https://dallascityhall.com/departments/office-of-equity/DCH%20Documents/equity-indicators-booklet-2019.pdf

[13] The institute bases this overall inclusion ranking on both "economic inclusion" and "racial inclusion." It measures economic inclusion by looking at housing affordability, income segregation, the share of working poor residents, and the high school dropout rate. It measures racial inclusion by examining racial segregation; racial gaps in homeownership, poverty, and educational attainment; and the share of the city's population who are People of Color.

Present-day policy choices have played a part in this worsening landscape. These choices include the "peanut butter approach" that recent City Councils have applied to revitalize the city. Mike Koprowski, who worked on the development of the CHP described the peanut butter approach this way: "Take a pot of economic development money, and spread it evenly across the city, to all 14 districts, from the have-nots to the have-a-lots." Observers trace this problem back to 1991, when, after increasing pressure for greater representation of the communities most impacted by long-standing inequities, the City of Dallas changed its City Council format to include 14 council members elected by 14 separate districts with the mayor being elected at-large.

Many of the stakeholders interviewed for this assessment expressed that under the current 14-1 system, the Council has struggled to act on remedying the huge infrastructure deficit that continues to hamstring economic opportunity and housing development in Southern Dallas. Individual Council members acknowledge that the present-day deficit has resulted from decades and decades of under-investment and the inequitable distribution of public funds under the former city governance formats, but such acknowledgment has not resulted in substantial budget allocations to level the playing field for historically neglected parts of the city.

Rather than committing to redressing the profound infrastructure disparities between Northern and Southern Dallas, city leaders have tended follow a long-standing pattern of placing subsidized housing in Southern Council districts. Absent any substantial concurrent investment in the infrastructural foundation needed in Southern Dallas for mixed-income neighborhoods, this pattern tended to exacerbate the concentration of poverty. In turn, this continued concentration discouraged the city away from strategically investing affordable housing funds in Southern Dallas.



Since 1990, LIHTC Developments have added more units to Dallas's southern side than in the northern districts, leading to concern and criticism from community stakeholders.

Advancing Equitable Impacts

Racial equity is both an outcome and a process. As an outcome, racial equity is achieved when race no longer determines one's socioeconomic outcomes, when everyone has what they need to thrive, no matter where they live. As a process**,** we apply racial equity when those most impacted by structural racial inequity are meaningfully involved in creating and implementing the institutional policies and practices that impact their lives. Developing racially equitable goals and outcomes will result in improvements for all groups, but the strategies can be targeted based on the needs of a particular group. Systems that are failing communities of color are actually failing all of us. [14]

The Government Alliance for Race Equity Framework notes that "*when we achieve equitable development, we increase the capacity of people of color to strengthen their communities and determine their own future and that of their neighborhoods. We distribute the benefits and burdens of growth equitably among people of all races, ethnic backgrounds, incomes, and geographies/neighborhoods. We encourage multicultural communities where tenured and newcomer residents can thrive. And we provide meaningful choices for the most impacted people of color to live, work, and define their own culture throughout all neighborhoods.*"[15]

[14] https://www.racialequityalliance.org/about/our-approach/benefits/
[15] https://www.racialequityalliance.org/wp-content/uploads/2016/11/GARE-Equitable-Development.pdf

The CHP will advance racial equity and succeed in reducing the higher barriers to safe, quality, affordable housing for Black and Brown Dallas residents when the City Council, city staff, developers, neighborhood advocates, and other community stakeholders agree that racial equity in housing development is a goal worth attaining. City leaders and affordable housing stakeholders would therefore all benefit from a firm grounding in racial equity. Establishing a common understanding of the benefits and values of developing housing with racial equity will propel Dallas policies in the direction of maximizing impact. As City Council Member Thomas stated to the consultant team, we must *"make sure there is an understanding [on the City Council] of what equity is and be intentional in how we develop policy and [assess] the impact of the policy we make."*

Step One: Understand and call out the historical legacy of policies and practices that caused present-day racial inequities

The *City of Dallas Equity Indicators 2019 Report* states that "decades of disinvestment in Black and Hispanic neighborhoods have culminated in substantial differences in basic housing conditions, neighborhood quality, and access to amenities." It also shares that "the indicators in this theme demonstrate deep disparities along racial/ethnic lines, particularly in Access to Housing and Housing Affordability and Services—disparities that have worsened since the baseline year." [16] As detailed in the section of this report titled The Historic Root Causes of Current Racial Disparities, Dallas's current housing landscape reflects structures and policies that were designed and implemented to segregate races and create unequal access to opportunity.

While the CHP provides the City Housing Department with the rules of the road for implementing 13 discrete programs, it lacks a comprehensive framework for dismantling the complex array of deep-rooted obstacles that have increased in scope and scale the longer the North-South Divide has been ignored. Moving forward, simple equality in the way the Council allocates resources and makes investments will not get to the root causes. Instead, proactive policies that dismantle structural racism will need to be developed, approved, and applied. Tackling root causes with proactive strategies requires establishing equity-centered goals that focus on the desired outcomes and thus build a foundation for all work to follow in advancing equitable impact.

[16] https://dallascityhall.com/departments/office-of-equity/DCH%20Documents/equity-indicators-booklet-2019.pdf

We need to acknowledge we are tackling this with our hands behind our backs. There are laws that prevented blacks from oning homes – structures that had generational effects. We can't fix it without legal remedies. It was illegal for blacks to own mortgages. We need to tackle root causes. Some infrastructure investment needs to be made.
--Participant in LGBTQ Stakeholder Listening Session

Step Two: Plan for Advancing Equity

The current goals of the CHP should be restructured to explicitly mandate comprehensive planning that advances racial and economic equity. Sample goals include:

- By 2023, city departments and divisions will effectively collaborate to ensure that there are plans in place for concurrent progress in all 14 districts toward reaching the affordable housing goals outlined in the CHP

- By 2025, city departments and divisions will present to Council collaborative projects across all 14 districts that each address multiple factors in neighborhood development, including equity in housing, education, transportation, health, economic, nutrition, infrastructure, planning, and zoning

- By 2022, the Council will approve a comprehensive plan to revise current policies to undo harmful structures that keep racism alive, including policies addressing the need for tax relief and infrastructure development and others prohibiting predatory lending practices, discriminatory rental policies, and restrictive zoning laws

- By 2035, Dallas will be a city where each neighborhood provides access to safe, quality housing and amenities for people in all racial and socio-economic groups so that residents can stay in their neighborhoods of choice.

Such goals will help to ensure that the CHP serves as an umbrella for all city plans that can contribute to supporting equitable housing development, including private, mixed-income, mixed-use, affordable, and supportive. The CHP should set the frame while the plans bring the policy to life. This approach was articulated well in Dallas City Council Member Blackmon's comments to the consulting team:

> *"On our end, knowing that what we decide today will have ramifications 5-10 years down the road. The world I am creating now will be for my grandkids. Segregated*

school districts are a byproduct of…[past] political decisions. We don't have the investment for the plan."

Step 3: Revise the CHP to Correct its Equity Blind Spots

The CHP outlines various programs equipped with tools that can contribute to addressing some of the impediments to equity, but it takes an equality rather than an equity approach to the implementation of these programs. It encourages one-size-fits-all solutions that turn a blind eye to historically rooted differences in the affordable housing needs and market conditions from neighborhood to neighborhood. The following chart outlines the CHP's many equity blind spots:

CHP Section	Equity Blind Spots
Goals 1. Create and maintain available and affordable housing throughout Dallas, 2. Promote greater fair housing choices, and 3. Overcome patterns of segregation and concentrations of poverty through incentives and requirements.	Goals do not demonstrate the overall desired state of an equitable Dallas with a level playing field for accessing safe, quality, affordable housing. Without making this desired state clear in the initial goals, the Council, staff, and public are not pushed to consider CHP programs through an equity lens. Further, the strategy of using incentives and requirements does not adequately reflect or address the historical policies and practices that made the current playing field so tilted to the disadvantage of Black and Brown residents.
References to Existing Plans	The policy lists the three plans: *forwardDallas! Neighborhood Plus*, and *The Consolidated Plan*. However, the CHP does not discuss how these plans should work together or how they connect to the CHP. Further, there is no outline of who is accountable for ensuring the interdepartmental collaboration to integrate related plans and policies. The CHP has no apparent connection to the *Dallas Equity Indicators Report* (2019). A connection to this report could help gauge how well the policy is moving Dallas toward the Council's equity goals.
Reinvestment Strategy Areas	The CHP lists the Reinvestment Strategy Areas: ● Redevelopment Areas ● Stabilization Areas

	● Emerging Market Areas These areas are described and defined. The gap is that there are no descriptions on how reinvesting in these areas addresses the historic racist policies or patterns of segregation. Nor are there connections made that outline how certain prioritized work or development in these areas will help achieve the CHP's goals. The CHP should include explanations of how different reinvestment strategies will specifically increase equity and decrease segregation.
Production Goals	In the absence of a whole-city vision for increased equitable affordable housing and revitalized neighborhoods, the production goals are a set of numbers with no connection to strategies that could lead Dallas toward the desired state. When production goals are established that align with the desired equitable impact, resources should be identified from multiple funding streams that will allow for those production goals to be achieved.
The Housing Policy Task Force	On the surface, the idea of a Task Force with city-wide representation sounds like a great way of engaging the community. Yet it appears that the Task Force has over 600 members on its listserv, there is minimal participation, and there is no clearly outlined work plan showing how the Task Force will function as a body that can enhance strategies and increase accountability. The Housing Policy Taskforce needs to have activities that align with the CHP, including reviewing progress, developing strategies for city-wide communication of progress, and assisting the staff in thinking through how barriers can be addressed as they arise. In addition, the Housing Policy Task Force should play an evaluation role as activities are adjusted to achieve the desired results.

List and Description of Programs ● Homeowner Programs ○ Home Improvement and Preservation ○ Subrecipient Minor Home Repair Major Rehabilitation Forgivable Loan Program ○ Housing Reconstruction Program ○ Dallas Homebuyer Assistance Program ○ DHAP Targeted Homebuyer Incentive Program ● Landlord Programs ○ Home Improvement and Preservation Rental Program ● Tenant Programs ○ Tenant-Based Rental Assistance Programs ● Developer Programs ○ New Construction and Substantial Rehabilitation Program ○ Mixed-Income Housing Development Bonus ○ Land Transfer Program ● Preserving Affordability ○ Title Clearing and Clouded Title Prevention Program ○ Community Land Trust Program ○ Targeted Rehabilitation Program	The CHP lists these programs and their requirements. The listing of these programs is not policy. Many programs are under-resourced and difficult to access. City Council management of city approval processes politicizes implementation, often to the detriment of progress toward the desired state of increased equity. These programs should be tools for an overall plan approved by the Council and managed by the staff. The Council would oversee ensuring that benchmarks are reached and assist staff in overcoming barriers at the policy level. The comprehensive strategic roadmap described above would outline in detail how each program would be used to achieve the goals.
Neighborhood Investment	The CHP defines Neighborhood Investment Zones and what they can be used for. NEZs could be used as a tool to build equity in the context of a broader strategic road map. This section, however, does not describe how NEZ are

	to be used strategically or with an eye to advancing equity.
Funding and Supporting Actions	This section lists the various federal, state, and local funding sources available to support the city's housing programs. Again, there is no description of how these funding sources should be used to achieve the desired state. Every CHP goal needs a developed strategy that includes how achieving the goal will be funded. Rather than just a list of funding sources, the CHP requires an outline of how each funding source will be leveraged and combined with other sources to achieve each goal. Each strategy must also include a timeframe.
Strategies, Tools, and Programs that will Require Additional Action	This section lists areas that require further exploration, but it provides no connection to the current CHP goals nor to needed goals around creating greater equity in Dallas's affordable housing landscape.

The City Council could eliminate these blind spots by using the CHP to create a comprehensive strategic road map with an array of strategies specifically tailored to address racial equity and the differing needs and development opportunities from one city area to another. The road map would include strategies specific to each of the 14 districts' unique characteristics and outline corresponding development strategies and funding sources. In combination, these strategies would comprise a whole-city policy framework that utilizes all relevant programs and specifies the funding required to make this framework viable and sustainable.

Examining Alternatives and Improvements

The roots of inequities in Dallas's housing landscape have been studied extensively over the years. Many plans and proposed solutions for addressing these inequities have been created. Yet the many gaps and blind spots in the CHP allow those plans and solutions to fall victim to politics—particularly the politics of NIMBYism. As a result most of these plans and solutions have not been fully implemented or have been shelved altogether.

The silence of the CHP around how equity-based strategies can be utilized to achieve community-wide goals, along with the absence of metrics to determine if the city is making progress toward such goals, contributes to this problem. These gaps in the policy enable

greater allegiance to the opinions of constituents advocating for their own Council district than to a whole-city approach to equitably increasing access to affordable housing in all 14 districts. They help support a system in which projects from well-resourced developers are approved without considering the impact on the larger system, while smaller developers in Southern Dallas bear a higher cost burden and contend with an increased likelihood that proposed projects will be rejected or will die while awaiting approval.

For example, one large developer spoke in a listening session of delays that cost more than $1 million while awaiting approval. This is not the type of loss that smaller or nonprofit developers can shoulder and adds to the cost of the development overall. This imbalance of resources and revenue prioritizes Northern Dallas over other parts of the city.

Closing these gaps could help make the CHP a powerful tool for remedying the root causes of racial inequities and disparities. Required actions include:

1. Setting measurable targets for improvement and concrete benchmarks specific to each Council district
2. Specifying a detailed plan for effective Council oversight for achieving these targets and benchmarks across all districts
3. Allowing flexibility for city staff to use a variety of resources and leverage partnerships as needed to help each district meet established targets and benchmarks
4. Codifying a requirement that progress moves forward at a similar pace across all areas of the city
5. Investing in infrastructure - acknowledging the lack of infrastructure development in Southern Dallas and laying out a plan for infrastructure improvements to these areas over a period of time to bring them commensurate with the infrastructure that exists in North Dallas
6. Establishing a basis for educating the Council, staff, and community members on the value of equity and thus building buy-in to the process
7. Requiring systemic change that addresses the historical disparities and overturns laws and practices that allow for racist practices to be promoted.

Such steps would need to be accompanied by a campaign to increase the public will to bring a whole-city plan for greater affordable housing equity to fruition. Success would also require the commitment of a critical mass of elected officials to the shared strategic vision for ensuring that *every district* carries its weight by bringing about needed change within its borders. Only then will the NIMBYism that affects too many Council decisions be reined in.

Washington, D.C. and Portland, Oregon have developed models for building the necessary public and political will that could provide models for Dallas.

The District of Columbia's "All 8 Wards" strategic vision for centering equity in its homeless response system called for short-term family shelters to be developed in all 8 Wards within 5 years. No facility could be developed until resources and sites were identified in all wards, ensuring that the developments were built concurrently. This type of approach mitigated against the temptation for City Council members to allow constituent opposition to projects within district borders to trump the commitment to achieving city-wide goals.

The strategy recognized that the costs and characteristics of each site would vary by location, but the city's commitment to ensuring equal access to for households across all parts of the city was vital. To that end, sites were designed to physically match the features of the neighborhood and included the input of all stakeholders in the design and decision-making process - Council, community members, and people experiencing homelessness.

Portland's Southwest Corridor Equitable Development Strategy integrates housing development with the light rail transit development. It provides support and services to move the city toward goals such as increasing wealth and preventing displacement in historically marginalized communities. Each goal has an implementation strategy tied to specific resources. The strategy also includes specific metrics to help the city measure overall progress and ensure concurrent progress to achieving each goal.

The Washington, D.C., and Portland strategic models both required City Council approval and included detailed plans for Council and community oversight. Both models build in accountability by transparently measuring progress toward specific benchmarks. Their oversight approaches both allow city leaders to address the availability of the resources needed as barriers to progress arise.

Since these models were adopted, the activities within the respective strategies have been revised based on conditions on the ground in each community. The respective Councils were updated on staff revisions to activities related to each strategy; however, such revisions did not require substantial change to the legislation approving the strategies.

In Dallas's case, such a model would need to center strategies that address the infrastructure needs of Southern Dallas neighborhoods. Investment by the city in access to sewer, water, and electricity, proper lighting, and the improvement of roads and transportation access to and from neglected areas of Southern Dallas would begin to establish neighborhoods where current residents can flourish. These neighborhoods would then become desirable to people of all income levels. Currently, historical infrastructure disinvestment results in costs that are often passed on to developers, which discourages the investment that the area so sorely needs.

Success Factors

For the CHP to succeed in helping the city reach its equity goals, it will require specific indicators of that success--benchmarks against which the city can measure how equity-based goals are being implemented, how much progress is being made, and the need for additional resource allocation.

Portland's Southwest Corridor Equitable Development Strategy (pg. 13) provides a solid example of how to measure progress toward ambitious targets specifically aligned with affordable housing goals as well as required activities within lead agencies. It also provides an example of how measuring progress against these targets can work hand in hand with ongoing planning to adjust resources as the initiative progresses from one stage to the next.

City of Dallas departments and divisions perform intersecting work based on many intersecting plans, but there is little evidence that this work happens in an integrated way. In fact, stakeholder input gathered in listening sessions suggests that implementation work on one plan is often at cross purposes with work on another and. Dallas could benefit from a crosswalk between *fowardDallas!*, *The Consolidated Plan,* the *Neighborhood Plus* plan, and the *Equity Indicators*. Such a crosswalk would help align goals and indicators related to increasing affordable housing equity. It would thereby create a more integrated, unified approach that would enable staff to better work in concert toward the desired state.
Depending on the goals of a restructured CHP, benchmarks within a more integrated approach to implementing intersecting plans could include:

- Resources for infrastructure improvement have been identified for Southern Dallas districts
    - Infrastructure elements will need to be defined but must, at a minimum, include water, sewer, electricity, internet, and transportation/mobility

- Community-based organizations have been identified and funded to help prevent displacement
    - Organizations have been selected to assist residents in navigating the maze of government programs and agencies that provide housing support services
    - Strategies have been developed to ensure that within historically marginalized areas experiencing gentrification, long-time homeowners can both increase the value of their assets and afford to pay their taxes

- Quality transportation, education, food, and health care are available in all Dallas neighborhoods.
    - Based on the goals for each community, the number and scope of these elements would be defined as specific metrics.

Benchmarks of this kind would provide an oversight framework for measuring progress that the City Council, city staff, and community stakeholders can utilize to collectively hold themselves accountable as CHP strategies are developed and implemented. They would also provide a guide for discussions about how to continuously improve the implementation of any plan that could contribute to reaching the ultimate goal of a more equitable city.

Ensuring Viability and Sustainability

Addressing the Funding Gap

The success of any enhancements to the CHP in equitably increasing access to affordable housing depends on dedicating adequate resources for the endeavor. The City of Dallas has incorporated equity into its budgeting process, but only a significant financial commitment will redress the historic disinvestment in southern Dallas and accelerate the strategic and equitable production of affordable housing at scale. Such investment would entail restructuring the use of federal programs and substantially increasing local resources.

Dallas's current investment strategy to-date stands in stark contrast to those of other cities with comparable housing affordability problems. In 2017, Dallas voters approved a $1.05 Billion bond program. This program included a proposition to use just over 5% of the total--$55 Million-- to facilitate the revitalization of commercial corridors, transit-oriented development, mixed-use developments, mixed-income housing, and neighborhood revitalization throughout the City. The City Council can draw from this 5% pot to approve affordable housing initiatives, but they also draw from it for economic development and other initiatives. In Atlanta, Seattle, Austin, and other cities, new mechanisms for generating *dedicated* local revenue at much higher levels have substantially boosted capacity for affordable housing production and are allowing policy makers to through on comprehensive strategic housing plans. Voter-approved local funding for affordable housing in these communities now dwarfs the amount that the Dallas City Council could potentially allocate from the $55 Million in 2017 bond funds intended to cover a wide range array of needs, including affordable housing.

For example, Atlanta recently deployed $100 million in new housing opportunity bond funding. In 2016 Seattle voters signed on to a $290 million property-tax levy for low-income housing. In 2018 Austin approved a $250 Million Affordable Housing Bond. Following suit and creating a dedicated local revenue stream would allow Dallas to make an investment in affordable housing equity at a scale similar to the scale of these other communities. It would ultimately allow the Council to sustain its drive toward greater equity.

It is difficult to determine the exact amount of new resources Dallas requires, especially without a strategic roadmap, but the most recent biennial budget forecast provides clues about the size of the funding gap between Dallas's affordable housing investments and those being made in these other cities. The forecast, which shows a relatively level amount of funding and no dedication of funds needed to take the initial steps for building equity, shows Dallas dedicates a significantly smaller percentage of its overall budget to housing solutions. The following chart illustrates just how large the gap is:

Resources Dedicated for Key Housing Development Goals for FY 20-21
Dallas $58.2 million of a $3.8 billion budget[17] (2.2%)
Seattle: $81.9 million of a $6.5 billion budget[18] (5.3%)
Austin: $90 million of a $4.5 billion budget[19] (4%)

For FY 21-22, the City of Dallas annual budget was $4.3 billion, of which housing programs received about $40 million, which includes $21M in ARPA funds. That allocation represents 1.7% of the overall budget, a decrease in the share shown in the FY 20-21 forecast.

For Dallas to achieve its equity and affordable housing goals, it needs to reverse this trend and substantially increase its investment and set aside significant dollars for community revitalization, including targeted increased investments toward remedying the historical disinvestment in Southern Dallas and the other historically Black and Brown areas.

Additional Needs

In addition to adequate funding, ensuring viability and sustainability requires developing structures to effectively manage plans and the resources. For example, to increase the adaptability of the CHP, the city should regularly schedule reviews so that the City Council, city staff, and community stakeholders respond to changing conditions on the ground and strategize around removing barriers to success.

Viability and sustainability also require adequate affordable housing staff capacity well beyond what is needed to merely ensure that the 13 CHP programs are administered in compliance with local, state, and federal laws and regulations. In taking a more equity-centered approach to affordable housing strategic planning, the city Housing Department's staff will need sufficient dedicated time for collaboration with other city departments and divisions, external public agencies, and community stakeholders. This type of intensive collaboration demands not only

[17] https://dallascityhall.com/departments/budget/financialtransparency/AnnualBudget/2122_02_Budget-Overview.pdf
[18] https://www.seattle.gov/Documents/Departments/FinanceDepartment/21proposedbudget/OH.pdf
[19] https://austintexas.gov/news/austin-city-council-approves-fiscal-year-2021-2022-budget

time but strong communication and negotiating skills. It also demands significant attention to the coordination of plans from department to department and agency to agency. Making the investment in the financial and human resources to increase equity while also accelerating the production of affordable housing will thus necessitate the use of General Fund dollars as much of the strategic and collaborative planning work needed will not always align with the expenses permitted in certain existing contracts.

Finally, viability and sustainability require continuous community engagement. In the listening sessions conducted for this assessment, many stakeholders reflected that there have been up to 168 plans created regarding City of Dallas housing problems. These stakeholders shared that little is known about the disposition of these plans--whether they were implemented, whether they were revised, or whether they were incorporated into other more comprehensive plans. Ensuring that a comprehensive strategic road map is implemented equitably entails devising a model for adjusting strategies based on ongoing, sustained engagement with all relevant community stakeholders. Successful elements of this approach used in other communities include dashboards to enhance transparency, online feedback tools, and community meetings with the specific purpose of sharing updates on progress toward SMART goals and the benchmarks created in alignment with those goals. Across the entire community, stakeholders should be able to see how the wide array of intersecting city plans administered by many different city departments and divisions are working in harmony and not at cross purposes.

City of Dallas

Appendix B: Equitable New Housing Policy Development

City Council Meeting
August 22, 2022

John Gilvar
Christine Campbell
Michele Williams
Community Equity Strategies

PRESENTATION OVERVIEW

- History and Background
- CHP Challenges
- Racial Equity Assessment Recommendations
- Approach to Implementation
- Process Outline
- Important Dates

BACKGROUND

Comprehensive Housing Policy adopted in 2018

- City's plan for:
  - Investing in mixed income housing
  - Redeveloping blighted areas
  - Ensuring for effective use of city resources
- A compliance framework to prevent the misuse of resources

Since CHP adoption Dallas has generated a pipeline of:

- 5,600+ units through Mixed Income Housing Development Bonus Program
- 4,300+ units through Low-Income Housing Tax Credit Program

CHP CHALLENGES

Lacks strategic vision

- Guiding the City in setting measurable goals across all 14 districts
- Acknowledging significant differences in need, conditions, and history

Numerous equity blindspots

- Silent on disparities and their root causes
- Lacks strategies to:
  - Eliminate disparities while increasing affordable stock overall
  - Expedite service delivery and spur neighborhood revitalization in marginalized areas

Compliance-oriented structure

- Severely limits staff flexibility to leverage program resources and collaborate
- Missed opportunities tied to market changes
- Inadequate support for new developers entering the City's housing market
- Insufficient assistance toward growing the scale and complexity of existing developers' projects

RACIAL EQUITY ASSESSMENT AND RECOMMENDATIONS

Building on work-to-date:

- Comprehensive racial equity assessment of the CHP presented to Council on 3/2/22
- City Council adopted the assessment recommendations on 4/27/22
- *Community Equity Strategies* consultant team that conducted the assessment now contracted to develop a new policy and strategic framework building on its recommendations

Project Team includes:

- *CES*: Christine Campbell, John Gilvar, and Michele Williams
- Dallas-based *buildingcommunityWORKSHOP*: Benje Feehan and Lisa Neergaard
- Community collaborators

A. FOUNDATIONAL RECOMMENDATIONS

A-1. Community Education:

Committing to Equity vs. Equality

A-2. Community Outreach and Engagement:

"People support what they help to create"

A-3. Vision Statement:

Level the affordable housing playing field for all racial groups and across the North/South Divide

B. STRATEGIC RECOMMENDATIONS

B-1. **A Comprehensive, Whole-City Strategic Roadmap**

City wide coordination and community partnerships

B-2. **Dedicated Funding and Resources**

Human and financial resources to achieve our goals

B.3. **Displacement Prevention**

Comprehensive, integrated, effective strategies

C. TACTICAL RECOMMENDATIONS

C-1. Generational wealth in historically Black and Brown communities

Expand and strengthen displacement mitigation toolbox

C.2 “All 14 Districts” Strategy

Moving forward together

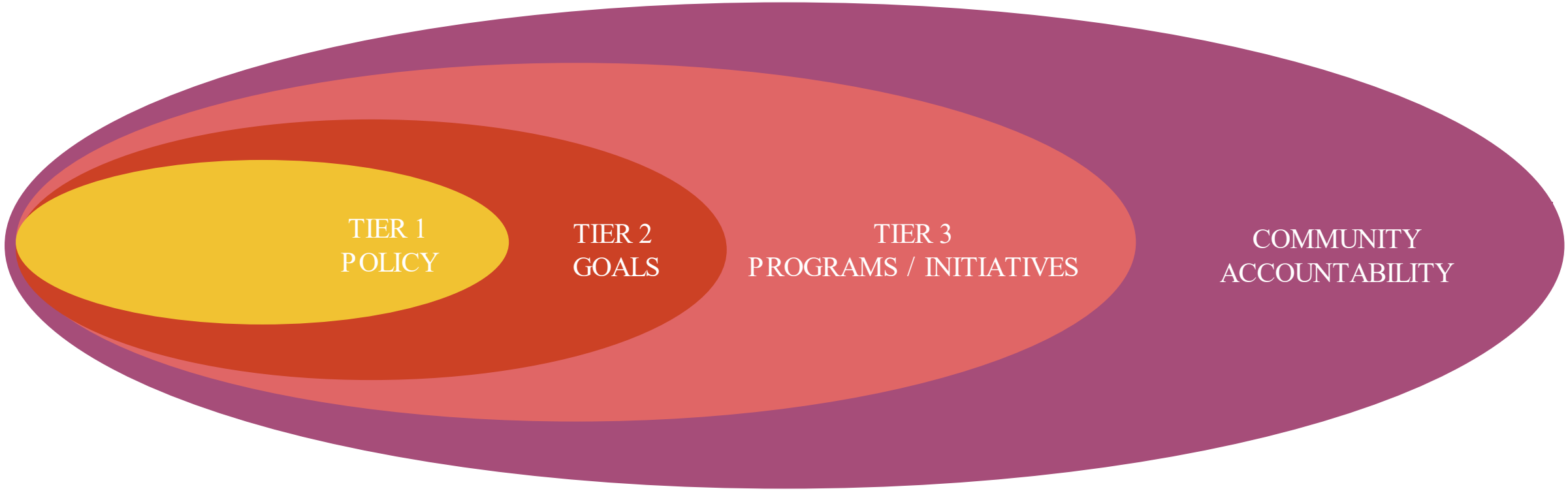
C.3. Community Education Campaign

Dispel myths about affordable housing that fuel NIMBYism

C-4. Strategic use of Housing Programs

LIHTC and other financing tools in both high opportunity areas with low poverty rates and distressed areas with higher rates

IMPLEMENTATION APPROACH



NEW HOUSING POLICY 3-TIER APPROACH

TIER 1
POLICY

Policy strategies will be proposed to:

- Bring the vision statement to life
- Guide goal setting
- Drive adjustments to city programs, initiatives, and processes to close identified gaps or correct any misalignment
- Establish the framework for accountable and transparent progress measurement

TIER 2
GOALS

SMARTIE GOALS

S*pecific*

M*easurable*

A*chievable*

R*elevant*

T*ime-Bound*

I*nclusive*

E*quitable*

SMARTIE goals clearly spell out:

- Measurable targets
- Due dates
- Specific impact on equity

Reports, dashboards, or scorecards provide a transparent view of progress toward SMARTIE goals and related metrics for city officials and the public

TIER 3
PROGRAMS / INITIATIVES

Existing and new programs will be aligned with policy priorities, strategies, and goals to promote:

- Needed program expansions or adjustments
- Sunsetting of misaligned programs

New initiatives can be designed to augment programs, close gaps, and enhance movement toward the goals

COMMUNITY ACCOUNTABILITY

Community stakeholders will help create

- Policy
- Goals
- Recommendations regarding programs and initiatives
- Progress measurement process and accountability structure

PROCESS FOR DEVELOPING NEW HOUSING POLICY

Recommendations	Research	Policy Development	SMARTIE Goals	Accountability
11 Recommendations Adopted by City Council. Foundation for new housing policy	Demonstrate community-wide affordable housing capacity and gaps Analyze current programs' effectiveness Identify gaps Review strategies used by other cities Ensure all 14 district are contributing to equitable strategies	Finish Vision Statement Draft policy strategies Address historic struggles with race and ethnicity Address racial disparities as well as increased community-wide affordability	Develop a set of measurable, equitable goals that will bring the policy strategies to life Identify tactics and resources to implement SMARTIE goals Align programs and initiatives with SMARTIE goals	Develop a transparent structure where City staff will continuously show progress on SMARTIE goals Communication strategy such that City officials and the community are updated at regular intervals Structure for ongoing communication between City staff, City officials and community stakeholders

Community Meetings and 2-Day Strategy Session + Ongoing communication, input and feedback → Community Engagement with all 14 Districts

IMPORTANT DATES

- August 22, 2022: *Overview of New Housing Policy Development*
- October 2022: *2-Day Strategy Session*
- December 7, 2022: *Full Council Briefing*

Equitable New Housing Policy Development

City Council Meeting
August 22, 2022

John Gilvar
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Community Equity Strategies

Appendix C: Inclusive Housing Task Force

CES recommends that should Dallas decide it needs a Housing Taskforce (HTF), as part of its community engagement strategy, they develop one that is inclusive and shares power with the community. In establishing the HTF, there should be support from a partner who understands community engagement, networking, policy development, and implementation.

Inclusive Housing Taskforce Sample Structure

The Housing Taskforce is designed as one of the ways that the City and community partner to ensure the effective implementation of the Dallas Housing Policy 2033.

Structure:

- Chair: Serves as the primary point of contact, convener, and project manager.
- Members: Serve as thought partners for Dallas Housing Policy 2033 Implementation.
- Committees: Committees would be established for specific tasks, including data collection and analysis, progress review, communication and transparency, and community engagement. Chairs would be representative of different membership categories. (i.e., if there are five chairs, one should be a community member, one from Development/Business, one from Advocacy and FB organizations (See Membership below)
- Leadership Team: made up of Chair and Committee chairs. Responsible for ensuring that all Taskforce activities are coordinated

Membership:

24 Members

- 12 community members (6 from historically disadvantaged communities)
- 3 Development/Business
- 4 Advocacy organizations
- 3 Philanthropy representatives
- 2 Faith-based organization representatives

In the overall makeup, there needs to be representation from all 14 districts

Member Responsibilities

- Attend 75% of scheduled in-person and virtual meetings
- Review materials such that they can actively participate in discussions and decision-making.
- Communicate to and collect feedback from sectors of the community
- Actively participate in Taskforce discussions and activities

Term Length:

Members will serve up to three 3-year terms with a possibility to renew to allow cycling on/off the task force. Terms will be staggered. In the first term, community members will have a 3-year term, and advocacy, faith-based developers, businesses, and philanthropy will serve two-year terms.

Membership Application (google form)
Candidates who are interested in serving on the task force are asked to submit an online application which includes:

- Name
- Title
- Organization/Affiliation
- District
- Contact information (phone number, email address, mailing address)
- Why are you interested in serving on the task force? (250 words or less)
- What do you hope to be able to contribute? (250 words or less)

Selection Process
All applications will be reviewed by a selection committee comprised of the following:

- Chair of Council Housing and Homelessness Committee/Chair of Council Equity Committee
- Housing and Neighborhood Revitalization staff person
- Community Member

Meeting Structure:
Meetings will be held every other month in a location easily accessible to members representing historically disadvantaged communities.

The task force will be a facilitated group with specific support for unaffiliated community members. All members have the responsibility to inform and engage the larger community.

Examples of Work products from Inclusive Tasksforces around the Country

- Fair Budget Coalition An Act of Justice
- James County Workforce Housing Taskforce