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ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

PLANO, TEXAS

May 2025

**Analysis of Impediments to Fair Housing
Choice
Plano, Texas**

May 2025

Prepared for:



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1 INTRODUCTION

The Analysis of Impediments to Fair Housing Choice (AI) is encouraged by the U.S. Department of Housing and Urban Development (HUD) for communities receiving federal housing and community development funds, such as Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funding. The City voluntarily chose to update the previous AI in support of the HUD-required certification that the City will affirmatively further fair housing (24 CFR 91.225). The overall goal of the AI is to review and assess impediments to fair housing within Plano, Texas. According to HUD, impediments to fair housing choice are:

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

Plano's AI was prepared in conjunction with required outreach, consultation, and coordination among various government agencies, private/nonprofit groups, public service agencies, City staff, and individuals. A list of participants in the AI is shown in the following Section 2. A summary of stakeholder interviews is included in Section 7.

The primary federal resources for the City include the CDBG and HOME programs through the U.S. Department of Housing and Urban Development (HUD). The AI consists of seven chapters, including:

1. Introduction
2. Purpose and Need for the Study
3. Demographic and Housing Condition Analysis
4. Records of Housing Discrimination
5. Review of Public Sector Policies
6. Review of Private Sector Practices
7. Impediments to Fair Housing Choice

Though some of the impediments identified in this report are beyond the direct control of Plano, the City bears responsibility for identifying these issues and developing strategies to ensure that its housing market is as open and inclusive as possible. The most prominent impediments to fair housing choice identified in this report include the following, explained in detail in Section 7:

- Cluster of Publicly Supported Housing in Minority- and Hispanic-Concentrated Areas with Lower Incomes and Limited Access to Resources and Opportunities, Coupled with Risk of Gentrification
- Limited Attainable Housing Options throughout Plano, Coupled with Restrictive Zoning and Community Resistance

- Risk of Reduced Public Transit Options and Decline in Access to Fair Housing Choices for the Lowest-Income Residents
- Limited Dedicated Local Funding and Insufficient/Loss of Funding for Attainable Housing Development and Homeownership Assistance
- Loss of the Fair Housing Center, Coupled with a Lack of Funding for Fair Housing
- Racial/Ethnic Disparity in Homeownership Access

2 PURPOSE AND NEED FOR THE STUDY

Title VIII of the Civil Rights Act of 1968 (and its subsequent amendment in 1988) mandates that it is unlawful to discriminate in the sale, rental, or financing of housing or, in the provision of brokerage services or facilities in connection with the sale or rental of housing, based on:

- Race,
- Color,
- Religion,
- National origin,
- Sex,
- Families with children, and
- Persons with disabilities.

The U.S. Department of Housing and Urban Development (HUD) encourages that all recipients of federal funds under the Community Development Block Grant Program (CDBG), HOME Investment Partnership (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs take actions to affirmatively further fair housing. This includes conducting an analysis to identify impediments to fair housing choice within the jurisdiction. Plano receives CDBG and HOME funds annually and chose to update its Analysis of Impediments to Fair Housing Choice (AI) in support of the HUD-required certification that the City will affirmatively further fair housing.

The purpose of this study is to conduct an independent Analysis of Impediments (AI) in accordance with HUD regulations under 24 CFR 570.904(c)(1). The City is committed to furthering fair housing choices within the city limits.

A. PREPARATION OF THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Plano principally administers its housing and community development programs through the Neighborhood Services Department. The Department administers various grants from federal, state, local, and private agencies. It is also the lead agency for producing the Analysis of Impediments to Fair Housing Choice. The AI was prepared by RKG Associates, Inc. of Alexandria, Virginia, a planning, economic, and real estate advisory firm working on behalf of Plano.

B. PARTICIPANTS IN THE ANALYSIS OF IMPEDIMENTS

The City's Analysis of Impediments to Fair Housing Choice included input from city officials, key stakeholders involved in the housing and community development industry, and affiliated service providers and organizations. In conducting the AI, the consultant interviewed individuals and organizations that represent the interests of protected groups. Participants included:

- North Texas Association of Realtist,
- National Association of Hispanic Real Estate Professionals, and

- Plano Housing Authority.

Note that the consultant also reached out to five other organizations and individuals three times during April 2025 for stakeholder interviews. However, the consultant has not heard back from these stakeholders as of the time this report was written in May 2025.

C. METHODOLOGY

This analysis includes a combination of quantitative and qualitative research. RKG Associates obtained data from The Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) developed by the Department of Housing and Urban Development (HUD), 2013 to 2023 American Community Survey 5-Year Estimates (provided by the U.S. Census Bureau), the 2000, 2010, and 2020 Census, the Home Mortgage Disclosure Act (HMDA) data, CHAS (Comprehensive Housing Affordability Strategy) data, and relevant reports published by various local agencies. The qualitative component includes interviews with agency staff and others involved in the provision of fair housing and/or related services in the Plano area.

3 DEMOGRAPHIC AND HOUSING ANALYSIS

A. INTRODUCTION

This section examines the existing demographic and housing characteristics of Plano by census tract and on the city level. It uses the categories, indexes, and data from the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) developed by the Department of Housing and Urban Development (HUD). The AFFH Data and Mapping Tool provides a uniform system for HUD grant recipients to follow in assessing their efforts and the challenges they face in furthering the purposes of the Fair Housing Act.

The following analysis provides an overview and insights into various demographic and housing topics included in the latest AFFH-T raw data. The latest data version used by the RKG team is Version AFFHT0007, dated November 2024. In addition, the analysts supplemented the study with population, racial and ethnic composition, household, and household income data between 2013 and 2023 (the most recent decade available at the time of the study) obtained from the U.S. Census Bureau American Community Survey 2013 and 2023 5-Year Estimates, as well as the Decennial Census.

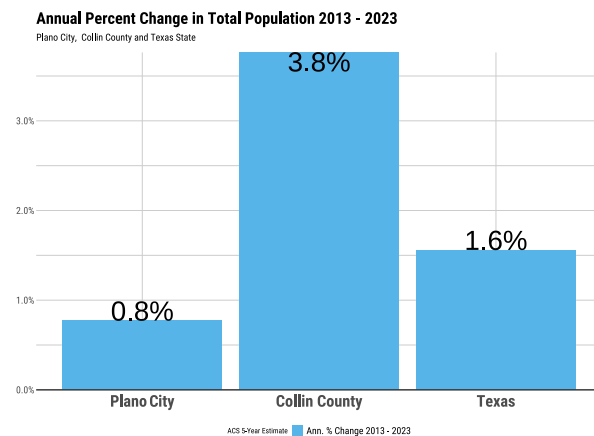
B. POPULATION, HOUSEHOLDS, AND HOUSEHOLD INCOME TRENDS

1. Population Trends

Plano's population was estimated at 287,339 in 2023, accounting for 25.7% of the county's population. The city has seen a decrease in its share of the county's population since 2013 from 32.9%.

Collin County, the State of Texas, and the city all experienced population growth between 2013 and 2023. However, Plano's population increased by only 0.8% per year, lagging behind the county and the state during this decade. In comparison, Collin County grew almost five times faster than Plano, and the state's population gained twice as fast as the city during the same period (Figure 3-1/Figure 3-2).

Figure 3-1



Source: ACS and RKG Associates, Inc., 2025

Among the census tracts within and around Plano, 29 tracts (around 30% of all tracts) throughout the city experienced a population decrease between 2013 and 2023. Census tracts that saw the fastest population growth between 2013 and 2023 are on the southeast corner and the northwest side of the city, including Census Tracts 319.02 (by 19.9%) and 319.01 (by 16.6%), followed by Tract 316.57 (by 12.9%) (Figure 3-3). The growth in the northwest of Plano is due to the development of the Shops at Legacy and Legacy West, a “live, work, and play” development which has been completed over the last decade. Similarly, the population growth in the southeast of the city is due to new multifamily construction in the downtown area. New apartments have been developed around the downtown DART train station and have resulted in a significant population increase due to formerly commercial properties being transformed into residential properties.

Figure 3-2

Population Trends 2013 - 2023

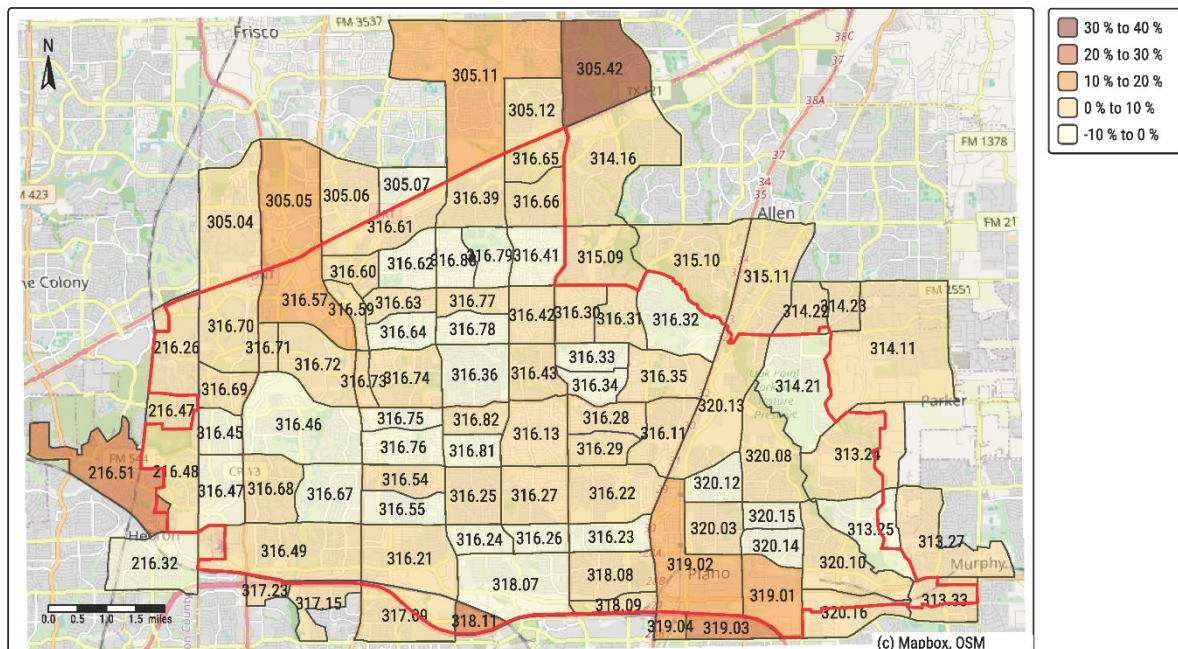
Plano City, Collin County and Texas State

| | 2013 | 2023 | Change 2013 - 2023 | |
|---------------|------------|------------|--------------------|---------------|
| | | | Actual Change | Ann. % Change |
| Plano City | 266,740 | 287,339 | 20,599 | 0.8% |
| Collin County | 811,308 | 1,116,601 | 305,293 | 3.8% |
| Texas | 25,639,373 | 29,640,343 | 4,000,970 | 1.6% |

Source: ACS 5-Year Estimates, RKG Associates Inc., 2025

Figure 3-3

**Population Annual Percent Change, 2013 - 2023 ACS
 Plano City, Texas Census Tracts**

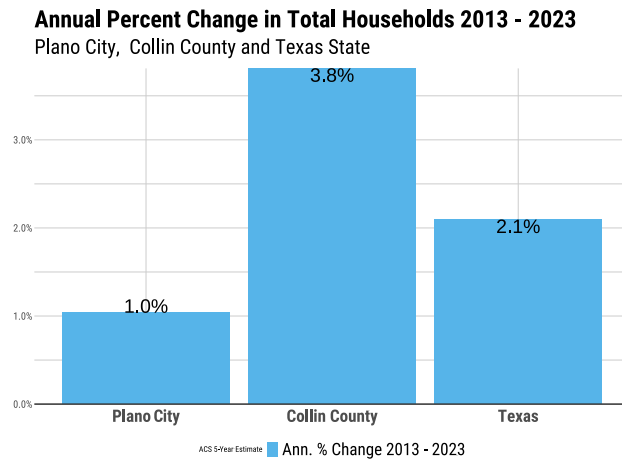


2. Household Trends and Household Size

The household changes between 2013 and 2023 in Plano, Collin County, and the State of Texas follow a trend similar to the population growth. The city's household gains fell behind the county and the state between 2013 and 2023, increasing by only 1.0% per year (Figure 3-4).

In addition, Plano has had a smaller household size (2.6 per household) than both the county (2.8 per household) and the state (2.7 per household) in 2023. This aligns with the city's slightly faster household growth than population gains between 2013 and 2023. This likely indicates that, compared to the county and the state, Plano has fewer large households (e.g., families with children) (Figure 3-5).

Figure 3-4



Source: ACS, and RKG Associates, Inc., 2025

Figure 3-5

Household Trends 2013 - 2023
 Plano City, Collin County and Texas State

| | Households & Avg. Household Size | | Change 2013 - 2023 | |
|---------------|----------------------------------|-------------------|--------------------|---------------|
| | 2013 | 2023 | Actual Change | Ann. % Change |
| Plano City | 100,136 2.7 | 110,522 2.6 | 10,386 | 1.0% |
| Collin County | 289,752 2.8 | 400,182 2.8 | 110,430 | 3.8% |
| Texas | 8,886,471 2.8 | 10,747,240 2.7 | 1,860,769 | 2.1% |

Source: ACS 5-Year Estimates, RKG Associates Inc., 2025

3. Median Household Income

The median household income in Plano has been similar to the county level but higher than the state figures between 2013 and 2023. The city’s median household income of \$108,649 in 2023 is 92% of the county level. However, the city’s median household income growth has fallen behind both the county and the state by 3.2% annually during the same decade (Figure 3-6). This is likely associated with Plano’s slower population gains compared to the county and the state during this period.

Figure 3-6

| Median Household Incomes 2013 - 2023 | | | | |
|---|----------|-----------|--------------------|---------------|
| Plano City, Collin County and Texas State | | | | |
| | 2013 | 2023 | Change 2013 - 2023 | |
| | | | Actual Change | Ann. % Change |
| Plano City | \$82,484 | \$108,649 | \$26,165 | 3.2% |
| Collin County | \$82,762 | \$117,588 | \$34,826 | 4.2% |
| Texas | \$51,900 | \$76,292 | \$24,392 | 4.7% |

Source: ACS 5-Year Estimates, RKG Associates Inc., 2025

The census tracts with the highest 2023 median household incomes within Plano are on the central, north, and west sides of the city (Figure 3-7). Census Tracts on the southeast side of the city, especially Tracts 319.01 and 319.02, have seen some of the fastest median household income growth in addition to the quickest population gains in Plano between 2013 and 2023 (Figure 3-8).

This area has experienced significant growth in multifamily housing near the downtown DART station. Once dominated by commercial properties, it now features several mixed-use developments that have drawn in a growing population of young professionals, especially those with higher incomes. Due to the increasing housing prices driven by the growing demand, residents typically need to have high household incomes to afford living here. This is further corroborated by the fastest median home value growth between 2018 and 2023, according to the American Community Survey data, which will be further discussed in Chapter 6. This suggests that the most vulnerable existing residents in southeast Plano, which is traditionally more affordable, face increasing risks of displacement and impediments to fair housing choices.

Figure 3-7
 Median Household Income, 2023 ACS
 Plano City, Texas Census Tracts

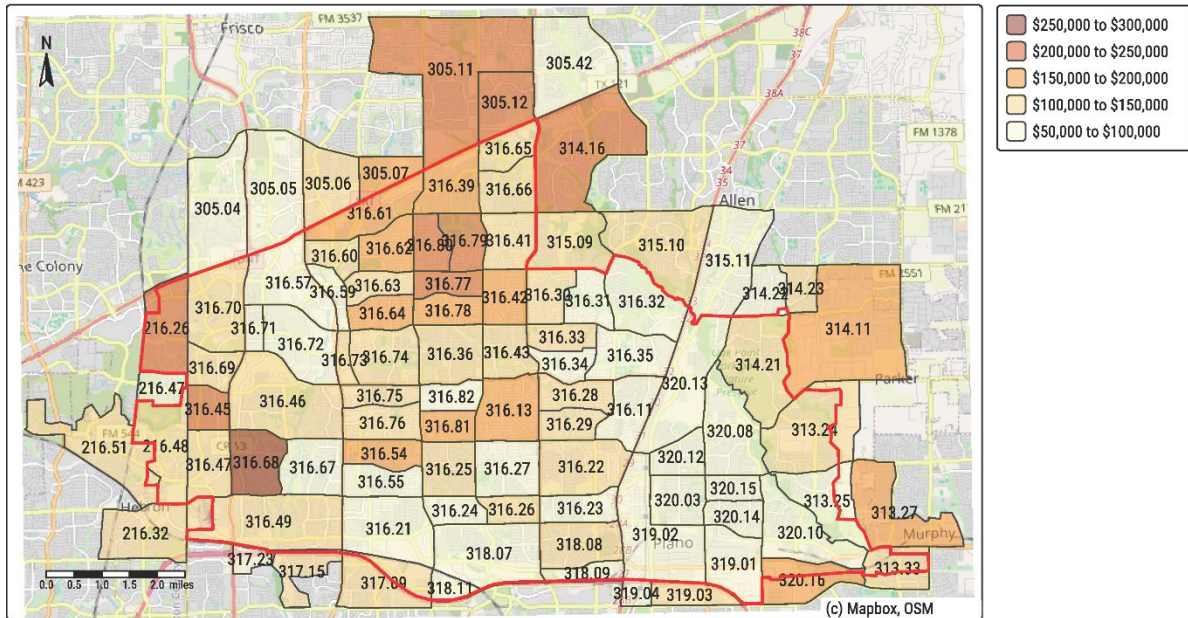
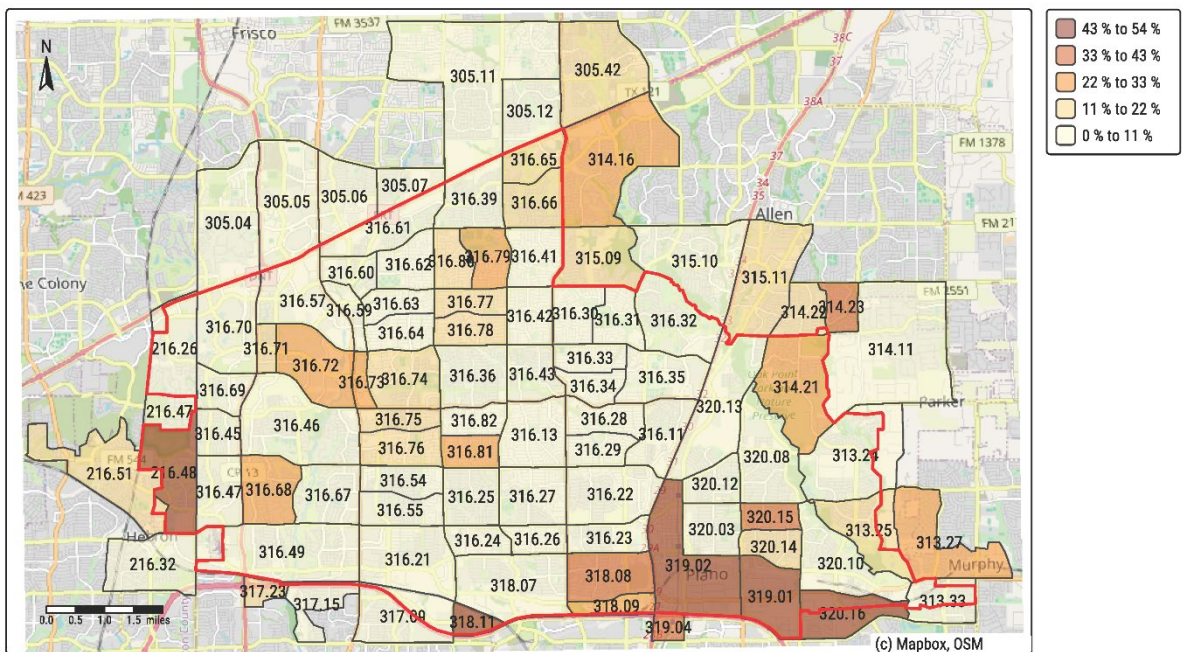


Figure 3-8
 Median Household Income Annual Percent Change, 2013 - 2023 ACS
 Plano City, Texas Census Tracts

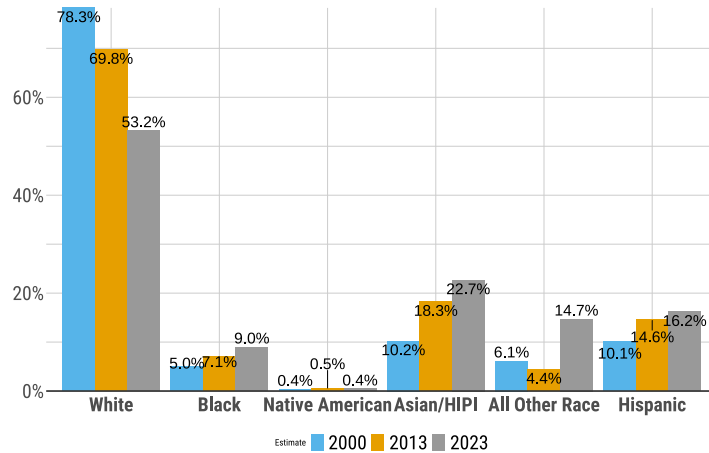


C. RACE AND ETHNICITY

1. Racial/Ethnic Trends and Composition

Over half of the city’s population identified as White in 2023. However, Plano has been diversifying in terms of its racial and ethnic composition since 2000, with the shares of almost all non-White racial/ethnic groups increasing. The biggest non-White minority group in the city in 2023 is the Asian and Native Hawaiian/Other Pacific Islander population (22.7%), followed by the Hispanic population (16.2%) and the population of “All Other Race” (14.7%) (Figure 3-9). It should be noted that the term “Hispanic” does not refer to a racial group. The U.S. Census Bureau uses the ethnonyms “Hispanic or Latino” to refer to “a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race” and states that Hispanics or Latinos can be of any race, any ancestry, any ethnicity¹.

Figure 3-9
Racial and Ethnic Composition, 2000 - 2023
 Plano City, Texas



Source: ACS and RKG Associates, Inc., 2025

In addition, people of “All Other Race” have seen a rapid growth between 2013 and 2023 after a drop during the previous decade. In contrast, all other racial/ethnic groups have grown at a slower pace and even declined during the most recent decade available (Figure 3-10).

¹ Wikipedia, <https://en.wikipedia.org/wiki/Hispanic>

Figure 3-10

Racial and Ethnic Composition Trends 2000 - 2023

Plano City, Texas

| | 2000 | | 2013 | | 2023 | | Change 2000 - 2013 | | Change 2013 - 2023 | |
|-----------------|---------|-------|---------|-------|---------|-------|--------------------|-------------|--------------------|-------------|
| | Count | % | Count | % | Count | % | Actual Chg. | Ann. % Chg. | Actual Chg. | Ann. % Chg. |
| White | 173,761 | 78.3% | 186,058 | 69.8% | 152,819 | 53.2% | 12,297 | 0.5% | -33,239 | -1.8% |
| Black | 11,155 | 5.0% | 18,875 | 7.1% | 25,800 | 9.0% | 7,720 | 5.3% | 6,925 | 3.7% |
| Native American | 803 | 0.4% | 1,280 | 0.5% | 1,289 | 0.4% | 477 | 4.6% | 9 | 0.1% |
| Asian/HIPI | 22,692 | 10.2% | 48,710 | 18.3% | 65,151 | 22.7% | 26,018 | 8.8% | 16,441 | 3.4% |
| All Other Race | 13,619 | 6.1% | 11,817 | 4.4% | 42,280 | 14.7% | -1,802 | -1.0% | 30,463 | 25.8% |
| Hispanic | 22,357 | 10.1% | 38,818 | 14.6% | 46,572 | 16.2% | 16,461 | 5.7% | 7,754 | 2.0% |
| All Minority | 48,269 | 21.7% | 80,682 | 30.2% | 134,520 | 46.8% | 32,413 | 5.2% | 53,838 | 6.7% |

Source: Decennial Census, ACS 5-Year Estimates, RKG Associates Inc., 2025

2. Racial/Ethnic Concentration

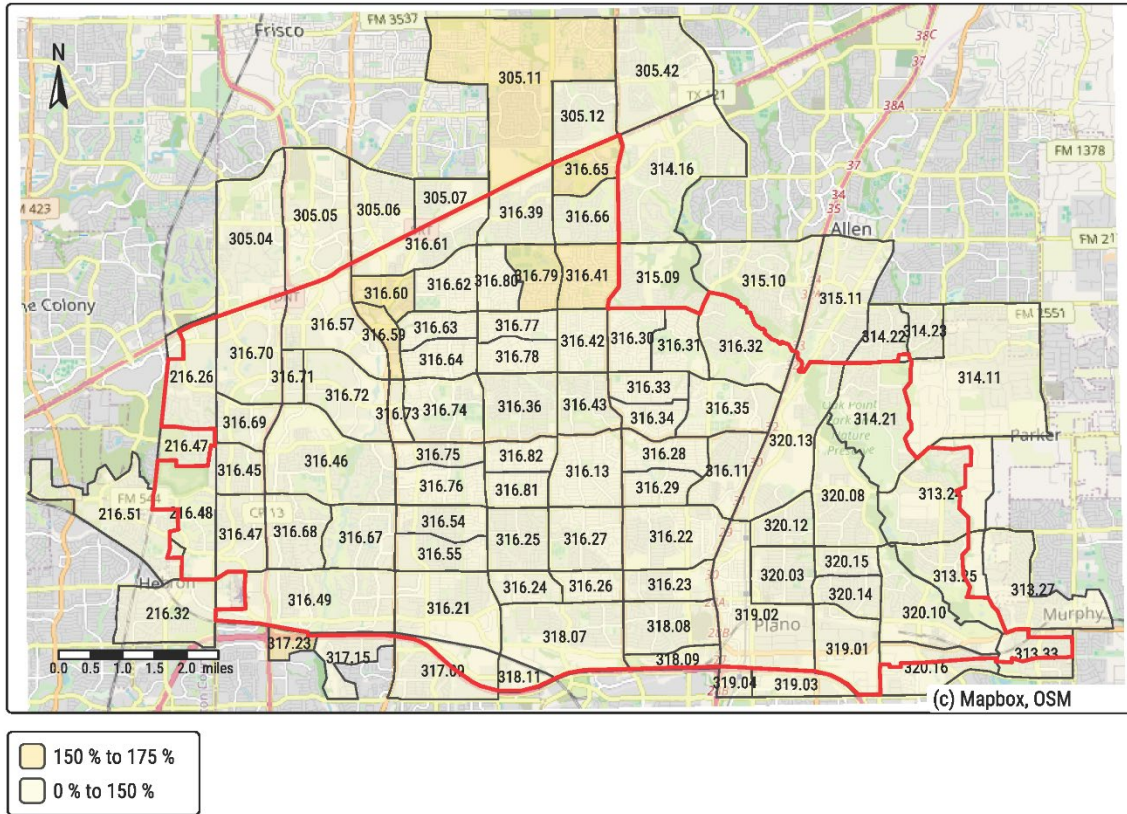
Federal regulations at Title 24 CFR 91.210(a)(3) “Housing Market Analysis” require grantees of HUD Community Planning and Development programs to identify and describe any areas within their jurisdictions that have concentrations of racial/ethnic minorities and/or low-income families. HUD currently leaves the determination of thresholds defining “concentrations” to each local grantee.

The approach currently applied by HUD’s Office of Policy Development and Research calls for an evaluation of population distribution in two primary categories: White, which includes any Census respondent who identifies as White and non-Hispanic, and minority, which includes any respondent identifying as a member of a non-White racial group or Hispanic ethnicity. Hispanic White people would be in the latter category.

RKG defined concentrations of minority or Hispanic populations as census tracts with non-White or Hispanic populations greater than 150% of the city-wide percentage of the combined minority or Hispanic population. For example, if the Hispanic population equaled 14.3% of the city’s population in 2023, then census tracts with Hispanic population shares of 21.5% or greater would be classified as a concentration.

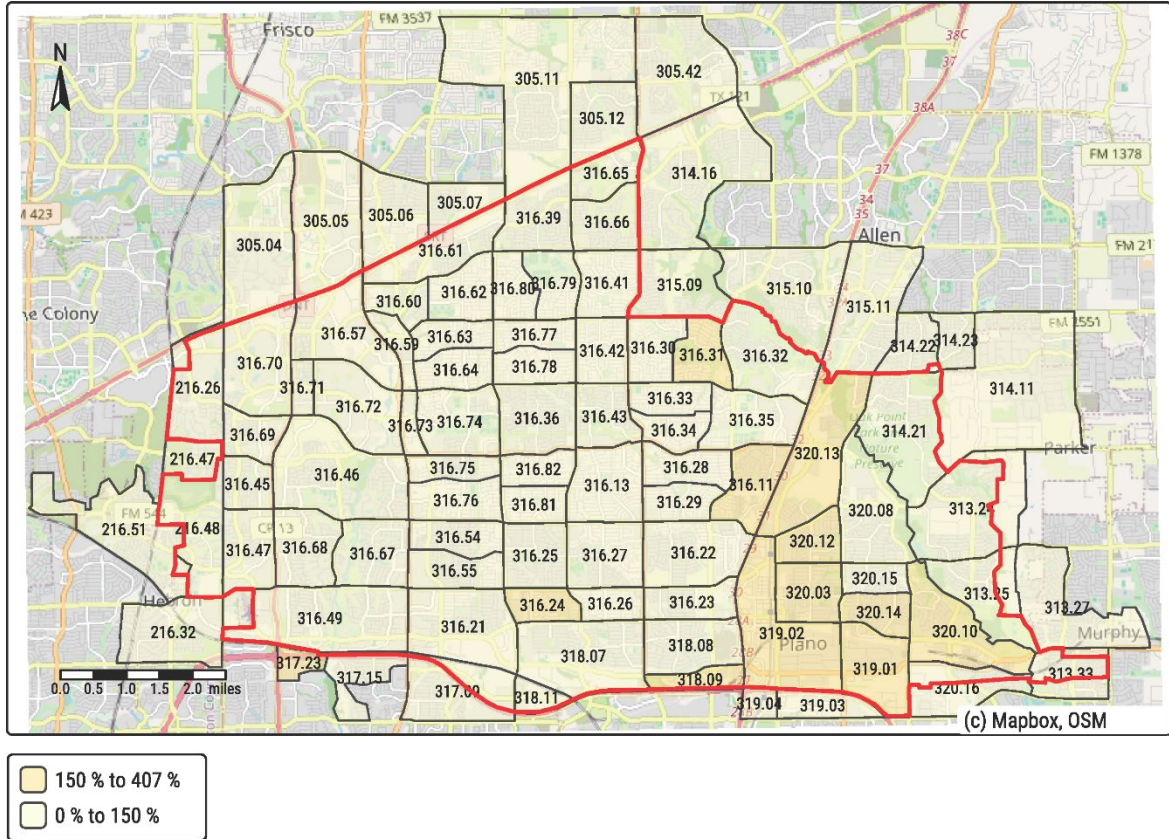
Plano has a concentration of the non-White Minority population on the north side of the city in Census Tracts 316.59, 316.60, 316.79, 316.41, 316.65. Tract 316.79 not only ranked among the top for 2023 median household incomes but also showed robust growth in income levels. In comparison, Tract 316.59 had a median household income below \$100,000 in 2023, with income levels gaining at a relatively slower pace. This reflects a mixture of income levels in minority-concentrated neighborhoods of Plano (Figure 3-11).

Figure 3-11
Minority Population Concentration, 2023 ACS
Plano City, Texas Census Tracts



In addition, the city also has a cluster of the Hispanic population mainly on the east side of the city, especially along and east of U.S. Route 75. These tracts generally overlap with areas with median household incomes below \$100,000 in 2023. However, Tracts 319.01 and 319.02 stood out with some of the fastest gains in both income levels and population between 2013 and 2023, as previously discussed (Figure 3-12). This suggests that the most vulnerable existing residents with lower incomes in these Hispanic-concentrated areas face increasing risks of displacement and impediments to fair housing choices.

Figure 3-12
Hispanic Population Concentration, 2023 ACS
Plano City, Texas Census Tracts



D. POVERTY AND RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAPS)

HUD defines that a neighborhood can be a R/ECAP if it 1) has a non-White population of 50 percent or more, and 2) has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

Plano has no R/ECAPs in 2023. This is because, though some census tracts meet the non-White population rate test, none of the tracts have a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, according to American Community Survey data. The census tracts with the highest poverty rates are Census Tracts 317.09, 319.01, 319.02, 316.35, 316.24, 320.13, 320.10, 319.04, 316.32, 320.14, and 316.66, all of which have over 50% non-White population and poverty rates over 10% in 2023. Most of them are on the east and north sides of Plano, overlapping with Minority- and Hispanic-concentrated areas.

E. RACIAL/ETHNIC DISSIMILARITIES

Another factor related to the geographic distribution of racial and ethnic groups within a jurisdiction is the Racial Dissimilarity Index included in the HUD AFFH-T database. According to HUD’s definition, “the dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups.” In other words, the Index measures how much one racial/ethnic group is spatially separated from another within a jurisdiction. The data for each racial/ethnic group is presented in comparison to the White segment of Plano’s population (Figure 3-10).

Figure 3-13

Dissimilarity Index by Race/Ethnicity 2000-2020
Plano City, Texas

| | 2000 | 2010 | 2020 |
|------------------------------|-------|-------|-------|
| Non-White/White | 21.47 | 24.26 | 27.38 |
| Black/White | 20.30 | 25.81 | 27.39 |
| Hispanic/White | 40.77 | 39.80 | 34.97 |
| Asian/Pacific Islander/White | 23.04 | 29.90 | 34.92 |

Source: HUD AFFH Data Version AFFHT0007, RKG Associates Inc., 2025

The Dissimilarity Index has values between 0 and 100, with a score of 0 representing perfect integration and a value of 100 corresponding with total segregation. A Dissimilarity Index below 40 represents low segregation, a value between 40 and 55 suggests moderate segregation, and a score above 55 indicates high segregation. All the Dissimilarity Index values for Plano in 2020 are below 40, indicating low segregation between racial and ethnic minority groups and the White population.

However, except for the positive downward trend in the dissimilarity levels between the Hispanic and White populations, segregation levels between the White population and other minority groups (All Non-White, Black, and Asian/Pacific Islander) have been on the rise between 2000 and 2020. The City should monitor this trend carefully to mitigate the risk of growing racial and ethnic segregation in Plano (Figure 3-13).

F. PLACE OF NATIONAL ORIGIN

According to the definition of the U.S. Census Bureau, the foreign-born population includes anyone who is not a U.S. citizen at birth, including those who become U.S. citizens through naturalization. Limited English Proficiency is used to refer to a person who is not fluent in the English language, often because English is not their native language. Understanding the foreign-born population and people with limited English proficiency is important for identifying the impediments to fair housing choice as well as associated solutions in Plano, as these population groups often have more limited fair housing options, usually due to cultural and language barriers.

Figure 3-14

Limited English Proficiency Persons by Top 5 Most Populous Languages
Plano City, Texas (ACS 2016 - 2020)

| Population with Limited English Proficiency | Count | % of Total Population |
|---|--------|-----------------------|
| Spanish | 12,634 | 4.6% |
| Other Indo-European language | 6,179 | 2.3% |
| Chinese | 5,621 | 2.1% |
| Other Asian & Pacific language | 4,466 | 1.6% |
| Korean | 1,403 | 0.5% |

Source: HUD AFFH Data Version AFFHT0007, RKG Associates Inc., 2025

The 2016 to 2020 5-Year Estimates based on the American Community Survey is the most current data series from HUD for the place of national origin data. According to the HUD AFFH data, the largest foreign-born group in Plano is the Indian population. The second-largest immigration group is the Mexican population, followed by people from China and Other South Central Asian countries. Apart from English, the most populous language in the city is Spanish, followed by other Indo-European languages, Chinese, and other Asian and Pacific languages (Figure 3-14, Figure 3-15).

Figure 3-15

Population by Top 5 Most Populous National Origin Groups

Plano City, Texas (ACS 2016 - 2020)

| Foreign-Born Population | Count | % of Total Population |
|--------------------------|--------|-----------------------|
| India | 21,997 | 8.1% |
| Mexico | 10,105 | 3.7% |
| China excl. Taiwan | 7,248 | 2.7% |
| Other South Central Asia | 4,809 | 1.8% |
| Korea | 2,628 | 1.0% |

Source: HUD AFFH Data Version AFFHT0007, RKG Associates Inc., 2025

G. DISABILITY BY TYPE AND AGE GROUP

The Americans with Disabilities Act (ADA) defines a person with a disability as “a person who has a physical or mental impairment that substantially limits one or more major life activity.” People with disabilities may face more barriers to fair housing options as they often need special physical accommodations in their housing and are more likely to experience housing discrimination.

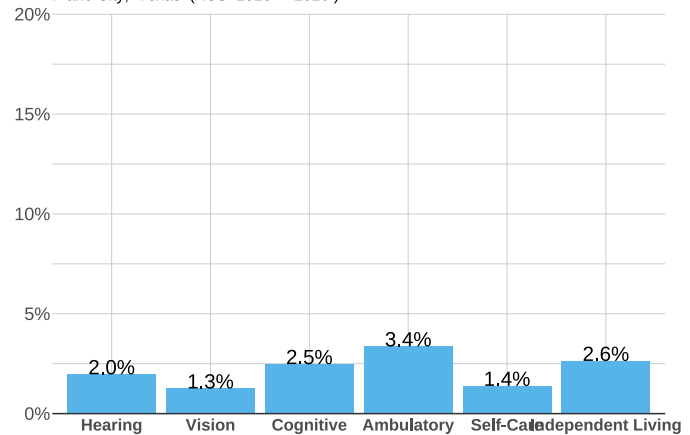
The disability rate in Plano is relatively low. Ambulatory difficulty is the most common type of disability for Plano residents, with 3.4% of people having trouble walking, followed by people with independent living difficulty. Note that a person may have multiple types of disabilities and may, therefore, be counted in more than one disability category (Figure 3-16).

Census Tract 316.78 has seen over 9% of its population with cognitive difficulty. Tracts 318.07 and 318.08 have over 10% of their residents with ambulatory difficulty, followed by Tract 316.32 (9.1%). Tract 318.07 also has 9.4% of residents with independent living difficulties, followed by Tracts 316.78, 316.28, and 316.26. Tract 318.08 has 8.0% of residents with self-care difficulties. These census tracts are generally in the south and northeast sides of the city, west of U.S. Route 75 which have recently seen a number of assisted living facilities and senior housing developments being built.

Figure 3-16

Persons with Disabilities by Type

Plano City, Texas (ACS 2016 - 2020)

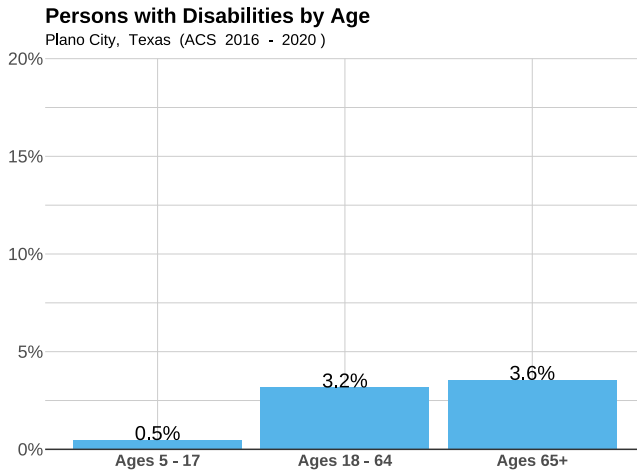


Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

This translates into the need for place-based strategies for residents with disabilities, including accessibility modification assistance and supportive services such as medical aid, as well as increased paratransit options and frequencies, particularly in these parts of the city.

Most people with disabilities in Plano are seniors aged 65 and older, accounting for 3.6% of the total population, according to the HUD AFFH data (Figure 3-17).

Figure 3-17



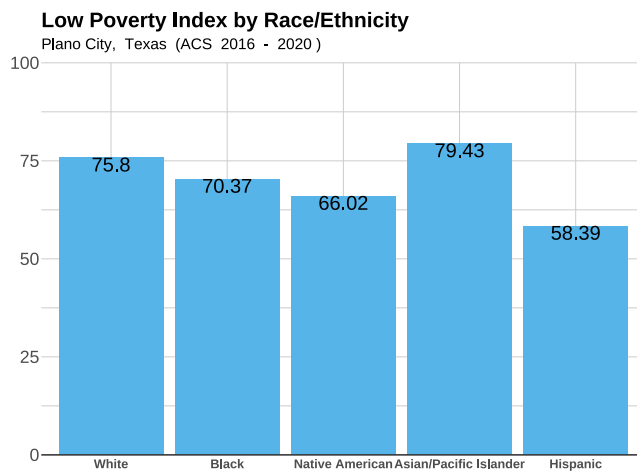
Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

H. POVERTY INDEX

The poverty level of the population within a jurisdiction is often associated with how easily the community can access opportunities and resources, including housing. If a community is exposed to high levels of poverty, then the residents may encounter more barriers to fair and affordable housing options. For example, a person living below the poverty level would likely not qualify for a mortgage loan due to lower income levels. HUD’s Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure a community’s exposure to poverty. The Low Poverty Index has scores ranging from 0 to 100, with a higher value representing less exposure to poverty in a neighborhood.

Within Plano, the Low Poverty Index scores of the different racial and ethnic groups all fall into the medium-to-high range, reflecting a generally lower exposure to poverty. However, racial and ethnic disparities exist. The Asian/Pacific Islander population, with the highest score of 79.43, has the least exposure to poverty, followed by the White population. In contrast, the Hispanic population, with a score of 58.39, has the most notable exposure to poverty compared to other racial/ethnic groups in the city. This is followed by the Native American population (Figure 3-18).

Figure 3-18



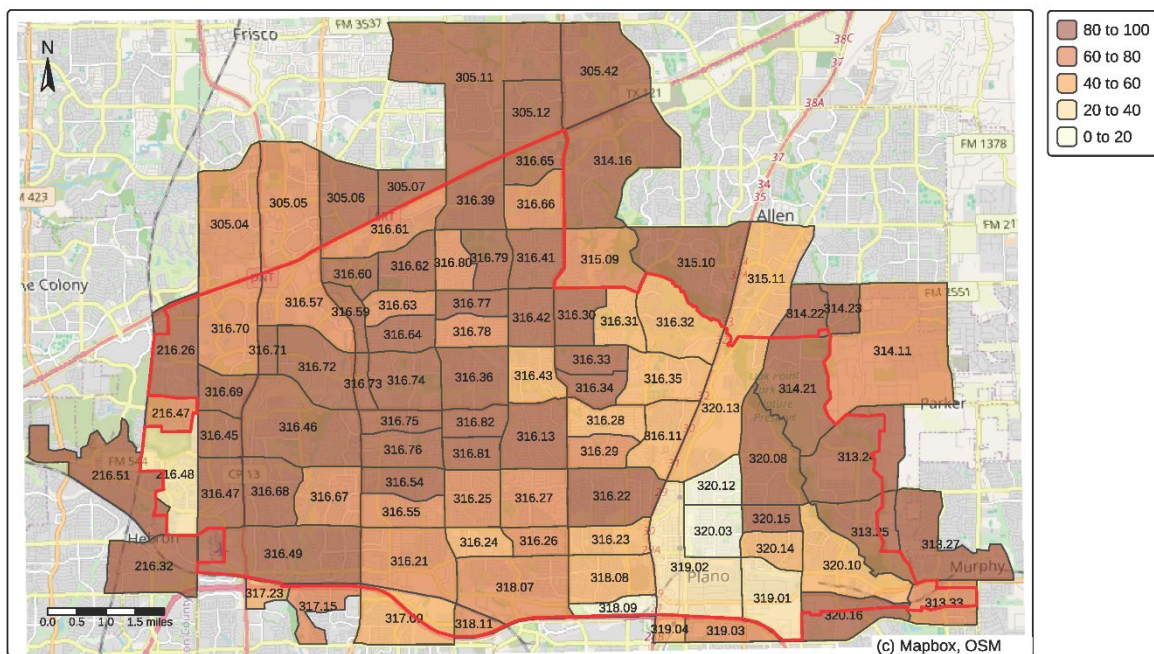
Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

There is also a geographic disparity in poverty levels across the city. The census tracts with the lowest Poverty Index scores and higher exposure to poverty generally overlap with areas with a cluster of the Hispanic population on the southeast side of the city. This outcome is

consistent with earlier findings indicating that Hispanic-concentrated areas in Plano generally have more exposure to poverty compared to other parts of the city (Figure 3-19). This map also closely aligns with the 2023 median household income map.

Note that Tracts 216.48, 319.01, and 319.02 also demonstrated some of the fastest increases in median household incomes between 2013 and 2023 in Plano, suggesting that the level of exposure to poverty in these areas is improving. However, Census Tracts 320.03 and 320.12, which reported lower 2023 median household incomes, higher exposure to poverty, slower income growth, and a concentration of the Hispanic population, are comparatively more vulnerable.

Figure 3-19
Low Poverty Index (ACS 2016 - 2020)
Plano City, Texas Census Tracts



I. SCHOOL PROFICIENCY INDEX

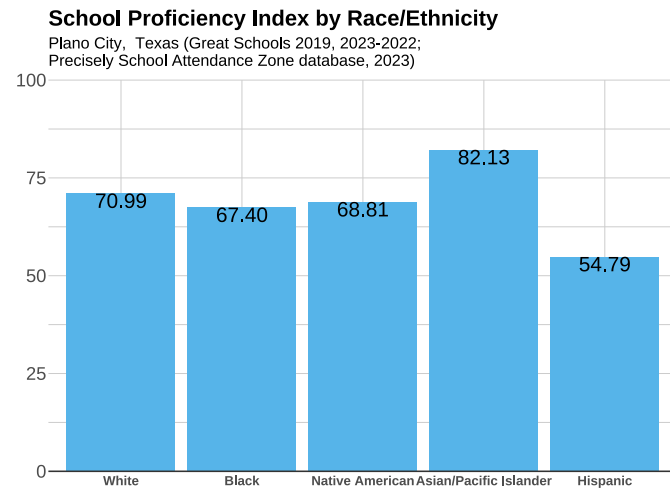
School proficiency is an indicator of the quality of the education available to a given community. Higher education quality is usually associated with better access to opportunities and higher income in addition to a higher quality of life. HUD's School Proficiency Index is based on the test scores of elementary schools within an area and measures which neighborhoods have high-performing elementary schools nearby. The values of the index range from 0 to 100, with higher scores indicating higher school system quality in a community.

Though the School Proficiency Index scores of the different racial/ethnic groups in Plano are relatively in the medium-to-high range, there is a disparity in access to quality education among the racial/ethnic groups. The differences in the School Proficiency Index scores are generally consistent with the gaps in the Low Poverty Index scores across racial and ethnic groups. For example, the Hispanic population

has the lowest School Proficiency Index score of 54.79 in addition to the greatest exposure to poverty. This is followed by the Black and the Native American populations, which have comparatively less access to education quality (Figure 3-20).

The School Proficiency Index values were then mapped by block group in the city, with darker colors indicating higher values and thus better elementary school performances (Figure 3-21). The lowest-performing census tracts in terms of school proficiency (below a value of 25) tend to be in the south and southwest sides of the city, where there is also a concentration of the Hispanic population and lower median household incomes.

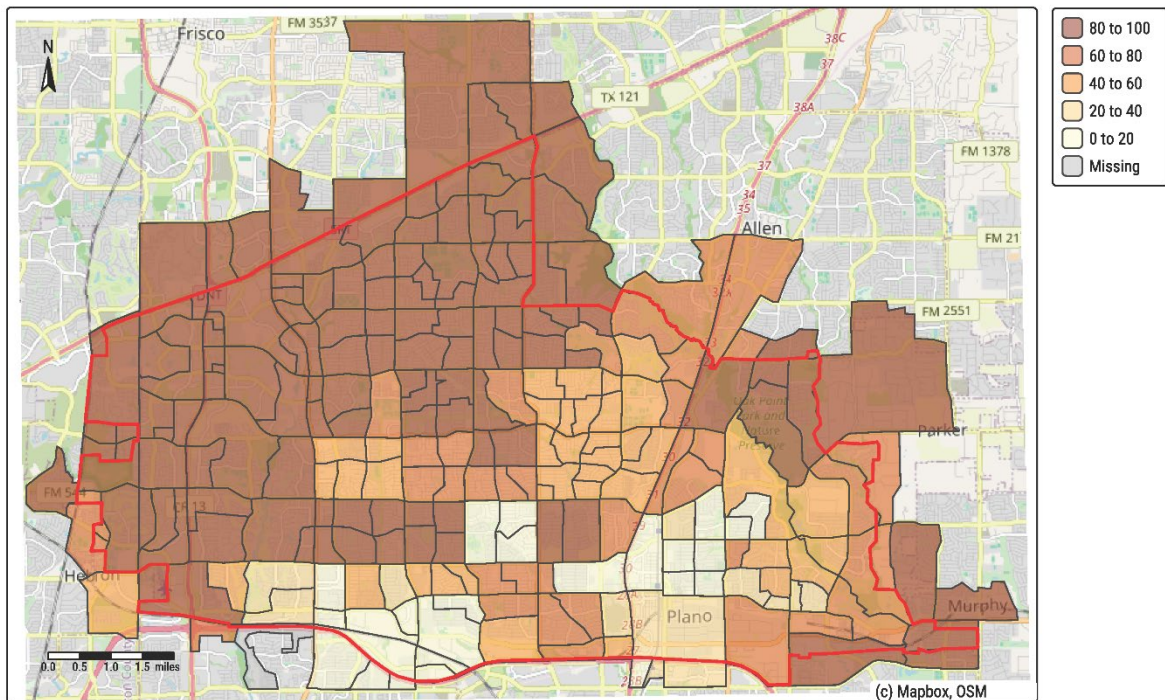
Figure 3-20



Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

Figure 3-21

**School Proficiency Index
Plano City, Texas Block Groups**



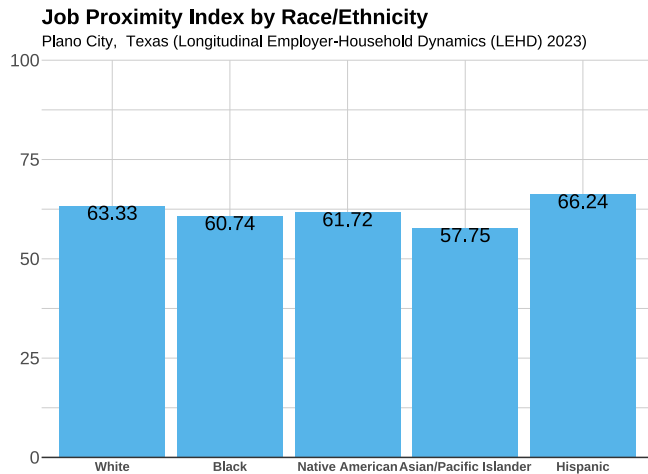
J. JOB PROXIMITY INDEX

HUD measures a community's access to employment opportunities with the Job Proximity Index and Labor Market Engagement Index. The Job Proximity Index quantifies the distance between a given block group and employment centers within a Core Based Statistical Area (CBSA). The index values range from 0 to 100, with higher scores indicating better access to job opportunities for residents in a neighborhood.

Job Proximity Index scores (Figure 3-22) across racial/ethnic groups all fall closely in the upper-medium range, indicating relatively moderate proximity to jobs overall in the city. The city's Hispanic population resides within the closest proximity to jobs, with the highest score of 66.24. In contrast, the Asian/Pacific Islander population resides the furthest away from employment centers, with the lowest score of 57.75 despite their higher income levels and elementary school proficiency. This result is likely linked to the growth of remote work, particularly prevalent in higher-paying sectors like information technology, which continues to expand in and around Plano.

Darker colors on the Job Proximity Index Figure indicate higher index values and, therefore, closer proximity to job opportunities. Neighborhoods on the south and west sides of the city are closer to jobs compared to the rest of the city. The pattern reflects the clustering of business parks along the Dallas North Tollway in west Plano, as well as the presence of service-oriented industries, including restaurants and Medical City Plano Hospital, in the southern part of the city. Northern areas of the city with lower Job Proximity scores but higher income levels are likely home to remote-working residents (Figure 3-23).

Figure 3-22

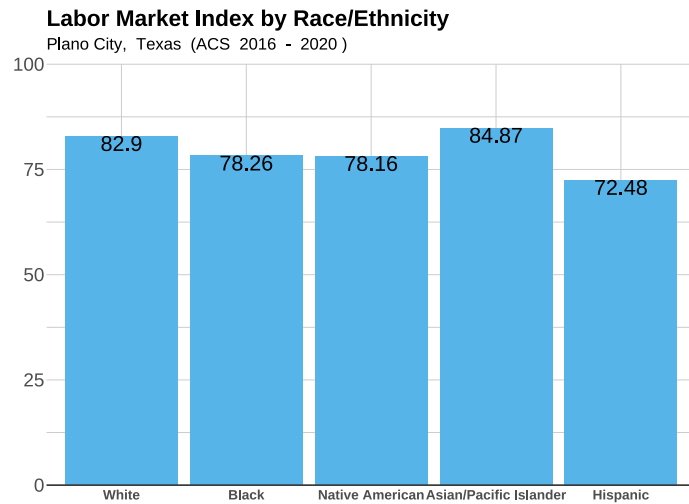


Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

The Hispanic population has the lowest score of 72.48, indicating lower levels of engagement in the labor market and human capital compared to other groups (Figure 3-24). This outcome aligns with this group’s lower levels of elementary school proficiency, as discussed earlier.

Labor Market Engagement Index values by census tract vary throughout the city, with darker colors indicating higher levels of labor market engagement and human capital and, therefore, better access to employment opportunities in a neighborhood. The data suggest that, except for Tracts 316.42 and 316.28, areas with lower levels of labor market engagement are generally on the east and especially the southeast sides of the city, overlapping with Hispanic-concentrated neighborhoods with lower household incomes and higher exposure to poverty (Figure 3-25).

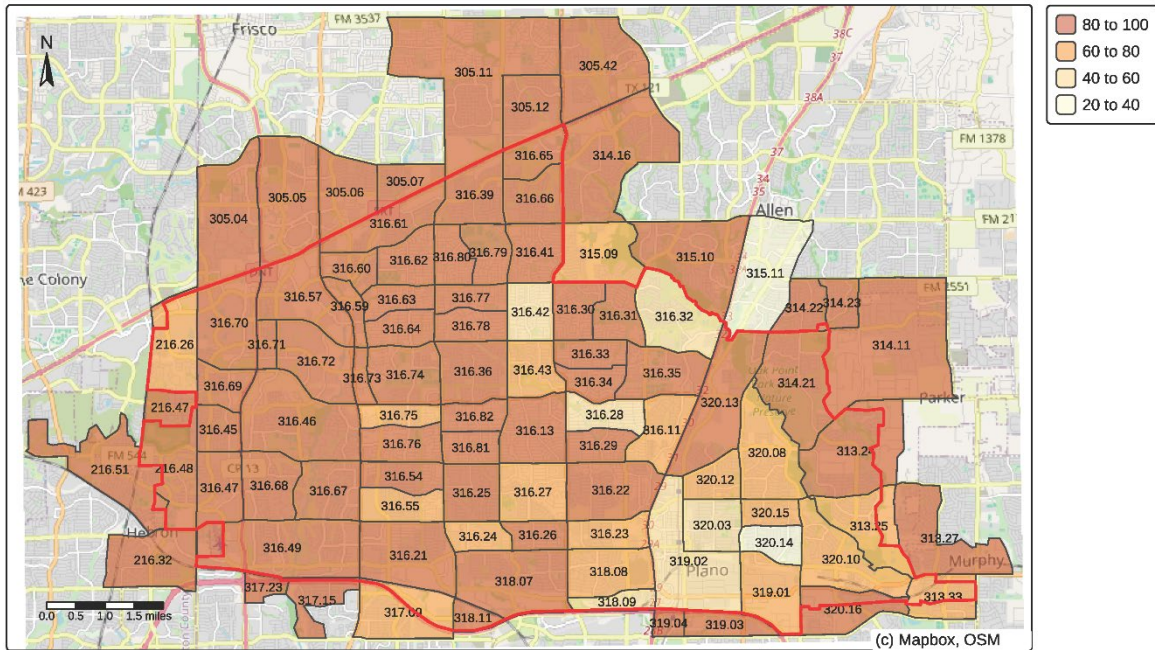
Figure 3-24



Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

This means that southeast Plano has a relatively small portion of the working-age population actively participating in the labor market, either by working or actively looking for work, indicating lower economic vitality in these areas. This calls for a place-based strategy from the City to focus investment on southeast Plano for job training and education programs, transportation infrastructure to connect people to jobs, childcare services, as well as economic development and business incentives. This is because expanding residents’ fair access to resources, including economic opportunities, is one of the key indicators of fair housing choice.

Figure 3-25
Labor Market Engagement Index (ACS 2016 - 2020)
Plano City, Texas Census Tracts



L. TRANSIT TRIP INDEX

According to HUD, the Transit Trip Index is not provided in the AFFH Data Version AFFHT0007 due to the lack of reliable source data.

M. LOW TRANSPORTATION COST INDEX

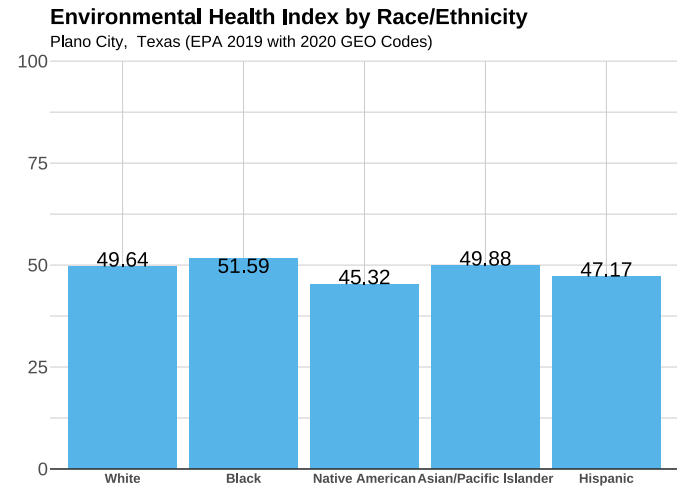
According to HUD, the Low Transportation Cost Index is not provided in the AFFH Data Version AFFHT0007 due to the lack of reliable source data.

N. ENVIRONMENTAL HEALTH INDEX

HUD also measures the environmental quality of neighborhoods with the Environmental Health Index. The index measures exposure to toxins harmful to human health at a neighborhood level. It is based on the U.S. Environmental Protection Agency (EPA) estimates of the air quality by neighborhood and only measures issues related to air quality and no other factors impacting human health. The Environmental Health Index has values ranging from 0 to 100, with higher scores representing less exposure to harmful toxins and, therefore, better environmental quality of a neighborhood.

The Environmental Health Index scores of different racial/ethnic groups in Plano are close ranging between 45 and 52, indicating moderate environmental health for all groups (Figure 3-26). However, differences among racial/ethnic groups still exist. The Native American population has the lowest Environmental Health Index score of 45.32, followed by the Hispanic population. This indicates that these two groups are more likely to reside in neighborhoods with lower air quality in Plano.

Figure 3-26

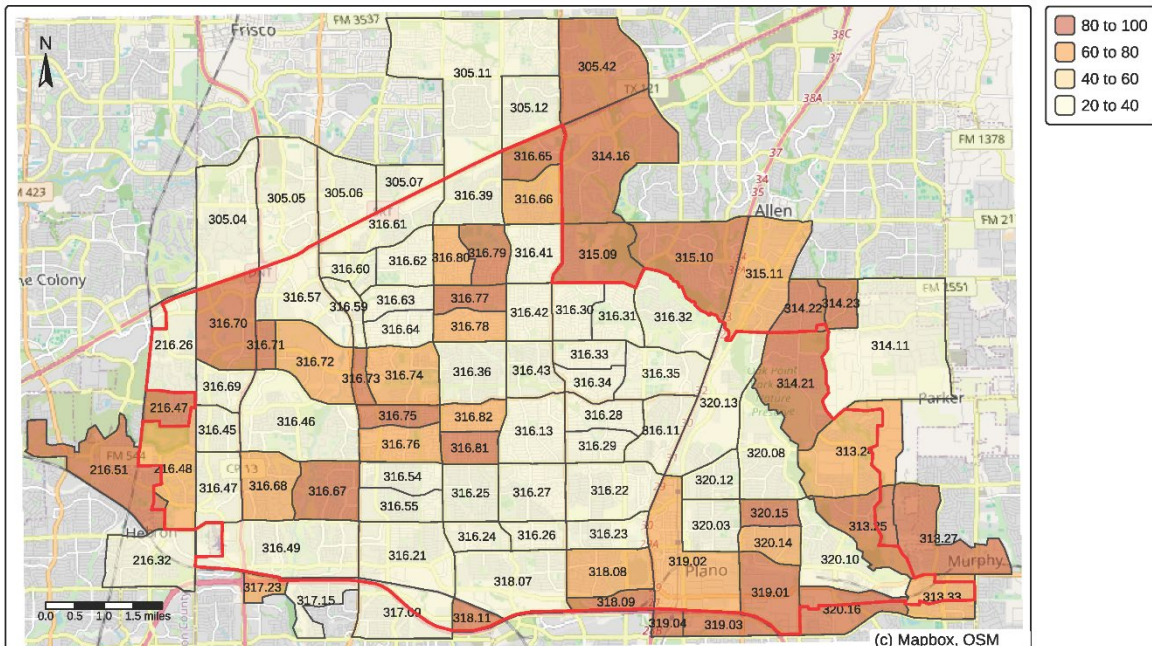


Source: HUD AFFH Data Version AFFHT0007 and RKG Associates, Inc., 2025

The environmental health across the city varies by location. The spatial difference of the Environmental Health Index in Plano is similar to some of the previous indices discussed. The central and northern areas of the city, as well as the west side, exhibit better environmental quality and higher household income levels. Note that while some southeastern tracts with lower incomes showed strong Environmental Health Index scores—a positive sign—others in Hispanic-concentrated areas reflected poorer environmental health (Figure 3-27). The primary environmental health factor in most communities is automobile emissions, particularly in urban areas where traffic volumes and congestion are typically higher.

Figure 3-27

Environmental Health Index (EPA 2019 with 2020 GEO Codes)
Plano City, Texas Census Tracts



O. HOUSING TENURE

The latest available HUD AFFH data utilizes CHAS 2016 to 2020 data to analyze neighborhood housing conditions and problems, though the latest CHAS data is CHAS 2017-2021. The consultants also complement the analysis with housing tenure data from the 2023 American Community Survey (ACS) 5-Year Estimates. One indicator to examine existing housing stability in Plano is the homeownership rate by racial/ethnic groups. As purchasing a home is the biggest investment most people will make in their lifetime, when property values appreciate, homeowners can accumulate asset value and household wealth at the same time. Therefore, a higher homeownership rate is usually associated with more household wealth and stability. Historically, minority racial groups tend to have lower homeownership rates than White households in the U.S.

This also generally holds true in Plano, where the White population in the city had the second highest ownership rate after the Native American population in 2023. In comparison, the Black population in Plano has the lowest ownership rate of merely 28.9%, followed by the Hispanic population. In addition, except for the Native American population, which is the only group experiencing an increase in its homeownership rate between 2018 and 2023, all other racial and ethnic groups have lower 2023 homeownership rates than the county and state, especially the Black population. Furthermore, ownership rates declined in Plano for all racial and ethnic groups except for the Native American population between 2018 and 2023 (Figure 3-28).

There is also a geographic disparity in homeownership rates across Plano. In general, neighborhoods that have experienced fast population gains and new multifamily developments on the northwest and southeast sides of the city have lower shares of owner households (Figure 3-29).

Figure 3-28

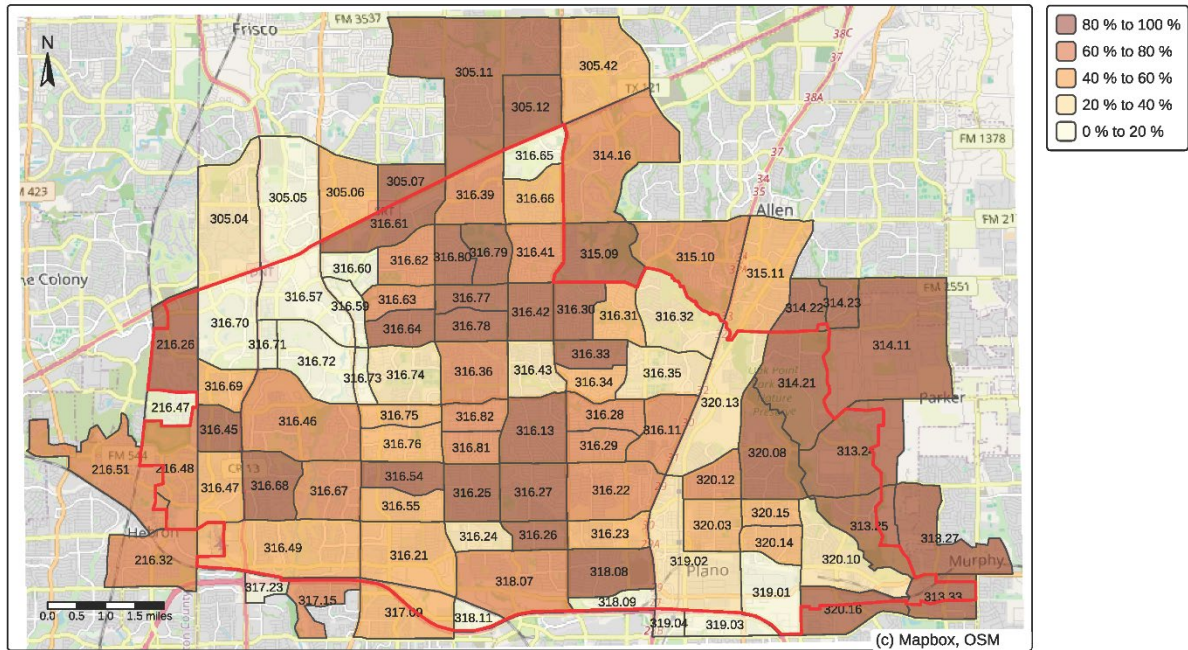
Ownership Rate by Race/Ethnicity 2018 - 2023

Plano City, Texas

| | 2018 | | | 2023 | | |
|-----------------|------------|---------------|-------|------------|---------------|-------|
| | Plano City | Collin County | Texas | Plano City | Collin County | Texas |
| White | 64.4% | 69.4% | 66.3% | 62.8% | 68.5% | 68.4% |
| Black | 30.8% | 40.9% | 41.0% | 28.9% | 41.7% | 41.5% |
| Native American | 45.9% | 57.7% | 58.8% | 75.7% | 74.1% | 60.0% |
| Asian/HIPI | 60.5% | 68.4% | 61.9% | 56.2% | 67.2% | 64.9% |
| All Other Race | 49.9% | 49.0% | 52.2% | 47.9% | 56.9% | 59.2% |
| Hispanic | 47.9% | 53.5% | 57.0% | 43.6% | 54.7% | 59.1% |

Source: Decennial Census, ACS 5-Year Estimates, RKG Associates Inc., 2025

Figure 3-29
Owner Household Percent (CHAS 2016-2020)
Plano City, Texas Census Tracts



P. LOCATION OF AFFORDABLE RENTAL HOUSING

The quantity of affordable rental housing units within a city is a key measure of the accessibility of fair housing options. Affordable rental units, as defined by AFFH, are those with rents at or below 30% of the income for a household earning 50% of the Area Median Income (AMI) within a given jurisdiction. According to the HUD AFFH data, among all the rental units in Plano, merely 7.9%, or 4,930 units, are classified as affordable units, most of them likely relying on public assistance, as discussed in the section below (Figure 3-30).

Figure 3-30

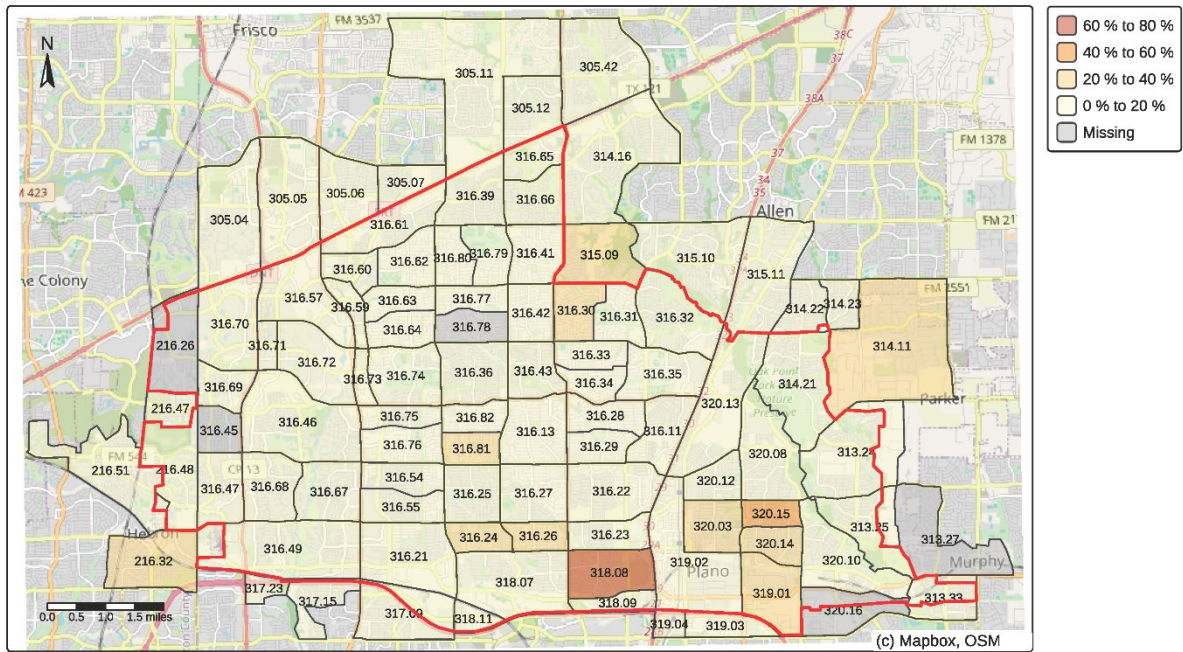
Affordable Rental Units (CHAS 2016-2020)
Plano City, Texas

| | Count | Percent |
|-------------------------------|--------|---------|
| Total Renter Units | 62,440 | 100.0% |
| Total Affordable Renter Units | 4,930 | 7.9% |

Source: HUD AFFH Data Version AFFHT0007, RKG Associates Inc., 2025

Neighborhoods with higher shares of rental units that are affordable are generally dispersed, with a greater concentration in the southeastern part of the city (Figure 3-31). Note that the latest available HUD AFFH data utilizes CHAS 2016 to 2020 data, though the latest CHAS data is CHAS 2017-2021.

Figure 3-31
 Percentage of Rental Units That are Affordable (CHAS 2016-2020)
 Plano City, Texas Census Tracts



Q. PUBLICLY SUPPORTED HOUSING AND RACE/ETHNICITY

The Plano Housing Authority, which is a separate entity from the City of Plano, operates within a 25-mile radius and manages 212 housing vouchers as of April 2025. In addition, Plano has 438 units assisted by the HUD Project Rental Assistance Contracts (PRAC)/Section 202/Section 8 program, 1,729 units funded by the Low-Income Housing Tax Credit program (LIHTC), and 2,423 units owned by the Public Facility Corporation. Note that 76 of the 212 housing vouchers are used for units within the HUD Project Rental Assistance Contracts (PRAC)/Section 202/Section 8 properties and LIHTC projects, with the remaining 136 vouchers used for scattered sites. In addition, K Avenue Lofts, a state tax-exempt project owned by the Public Service Corporation, is also funded by LIHTC. Therefore, excluding duplicates counted under multiple programs, the total number of income-controlled housing units in Plano is around 4,547 (Figure 3-32), which is only 7.3% of all rental units (based on CHAS 2016-2020 data shown in Figure 3-30). This suggests that merely 0.6% of all the rental units in the city are naturally affordable without public assistance.

The consultants also obtained data on the housing voucher participants (though not all are located within Plano, but within a 25-mile radius) from the Housing Authority. The majority (62.6%) of the housing voucher participants are African American, though Black residents only accounted for 9.0% of the city's total population in 2023. This suggests an overrepresentation of Black residents in the housing voucher program. In addition, most (77.0%) of the households are headed by females (Figure 3-33).

Figure 3-32
Active Income-Controlled Housing Units
Plano, TX

| | Target Tenant Type | Income- Controlled Units | Earliest Expiration Year |
|---|--------------------|-----------------------------|-----------------------------|
| Housing Voucher | | 212 | |
| Housing Voucher (76 overlap with the units below) | N/A | 212 | N/A |
| HUD Project Rental Assistance Contracts (PRAC)/Section 202/Section 8 | | 438 | |
| Plano Community Homes East Campus | Elderly/Disabled | 129 | 2042 |
| Plano Community Home West Campus | Elderly | 167 | 2036 |
| Pioneer Place Senior Housing | Elderly | 134 | 2046 |
| Collin County Community Homes | Disabled | 8 | 2043 |
| LIHTC | | 1,729 | |
| Patriot Park Family | Family | 111 | 2044 |
| Tuscany Villas | Elderly/Disabled | 90 | 2041 |
| Gala At Premier | Elderly/Disabled | 77 | 2052 |
| Garden Gate Apartments | Individual/Family | 240 | 2025 |
| Evergreen at Plano Independence Senior Community | Elderly/Disabled | 250 | 2036 |
| The Plaza at Chase Oaks | Elderly/Disabled | 240 | 2036 |
| The Veranda Townhomes | Individual/Family | 20 | 2050 |
| Villas of Mission Bend | Elderly | 101 | N/A |
| Villas at Plano Gateway Senior Living | Elderly | 233 | N/A |
| Mariposa Apartment Homes | Elderly | 108 | N/A |
| Parmore Jupiter Road | Elderly | 80 | N/A |
| K Avenue Lofts (also State Tax Exempt) | General | 179 | N/A |
| State Tax Exempt (Owned by Public Service Corporation) | | 2,423 | |
| K Avenue Lofts (also used LIHTC) | N/A | 179 | N/A |
| Steeplechase | N/A | 188 | N/A |
| Fairfield Legacy Plano LP (Opal Legacy) | N/A | 158 | N/A |
| Enclave Gateway | N/A | 177 | N/A |
| Bel Air 16 | N/A | 78 | N/A |
| Oak Tree Village | N/A | 139 | N/A |
| Latitude | N/A | 154 | N/A |
| Alexan Legacy (Jada) | N/A | 196 | N/A |
| McDermott 55 Crossing/Park | N/A | 241 | N/A |
| Bel Air Oaks | N/A | 242 | N/A |
| Collin Creek | N/A | 161 | N/A |
| Thornbury at Chase Oaks | N/A | 192 | N/A |
| Avalon at Chase Oaks | N/A | 167 | N/A |
| Summers Crossing | N/A | 151 | N/A |

Source: National Housing Preservation Database, Texas Department of Housing and Community Affairs, and Plano Housing Authority, 2025

The locations of the income-controlled HUD Project Rental Assistance Contracts (PRAC)/Section 202/Section 8 and LIHTC projects were then mapped (Figure 3-34). A map of the shares of housing voucher units by census tract was obtained from HUD’s AFFH-T database (the latest available version for this map is AFFHT0006) (Figure 3-35). The results mirror the earlier map, showing clusters of income-controlled housing units in the city’s southern and northeastern areas where a higher share of rental units is affordable and proportionally more households have lower incomes, generally along U.S. Route 75. They also overlap with the city’s neighborhoods designated as Low to Moderate Income Block Groups (Figure 3-36), according to the 2020 Census data. This suggests that attainable rental housing options are limited to low- to moderate-income areas. In other words, there is a concentration of poverty in areas with publicly supported housing options, leaving limited fair housing options for lower-income residents in other parts of Plano.

Figure 3-33

**Section 8 Housing Voucher (Housing Choice Voucher, Project-Based, Veterans Affairs Supportive Housing)
Participant Demographic
Plano Housing Authority, TX**

| | Count | Percent |
|--------------------------------|--------------|---------------|
| Total Persons | 1,105 | 100.0% |
| White | 306 | 27.7% |
| Black | 692 | 62.6% |
| American Indian/Native Alaskan | 1 | 0.1% |
| Asian/Pacific Islander | 22 | 2.0% |
| Mixed | 24 | 2.2% |
| Other | 49 | 4.4% |
| Declined to Report | 11 | 1.0% |
| Hispanic/Latino | 89 | 8.1% |
| Households | 501 | 100.0% |
| Male Heads of Household | 115 | 23.0% |
| Female Heads of Household | 386 | 77.0% |

Source: Plano Housing Authority, TX, 2025

Figure 3-34
Publicly Supported Housing
Plano City, Texas

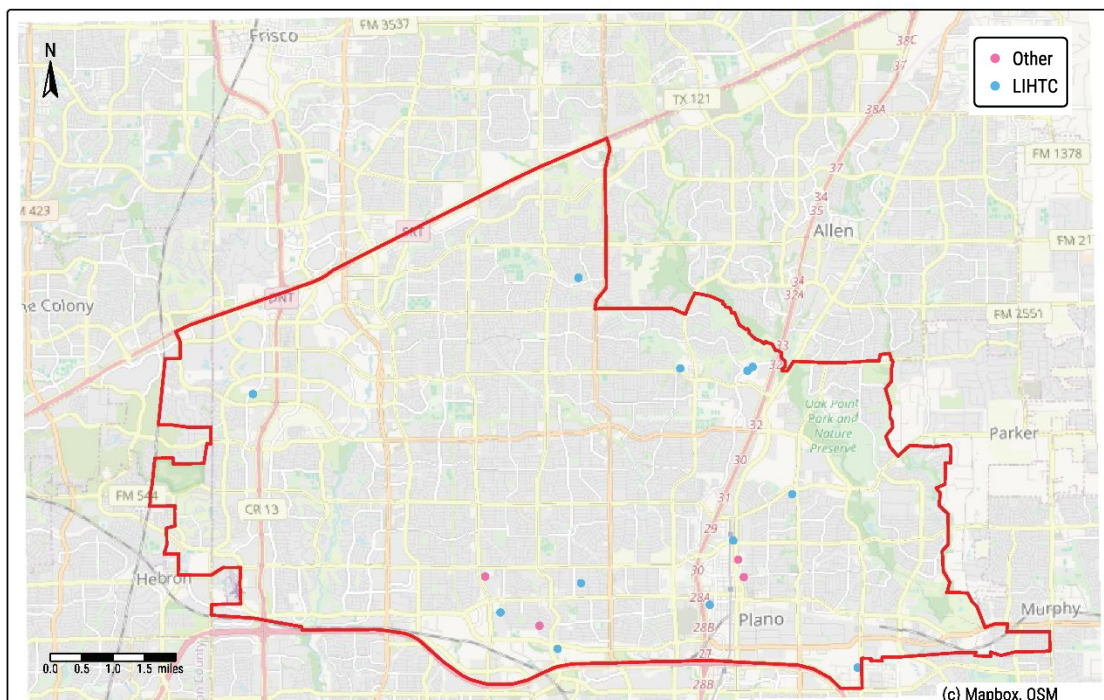


Figure 3-35: Share of Housing Voucher Units by Census Tract

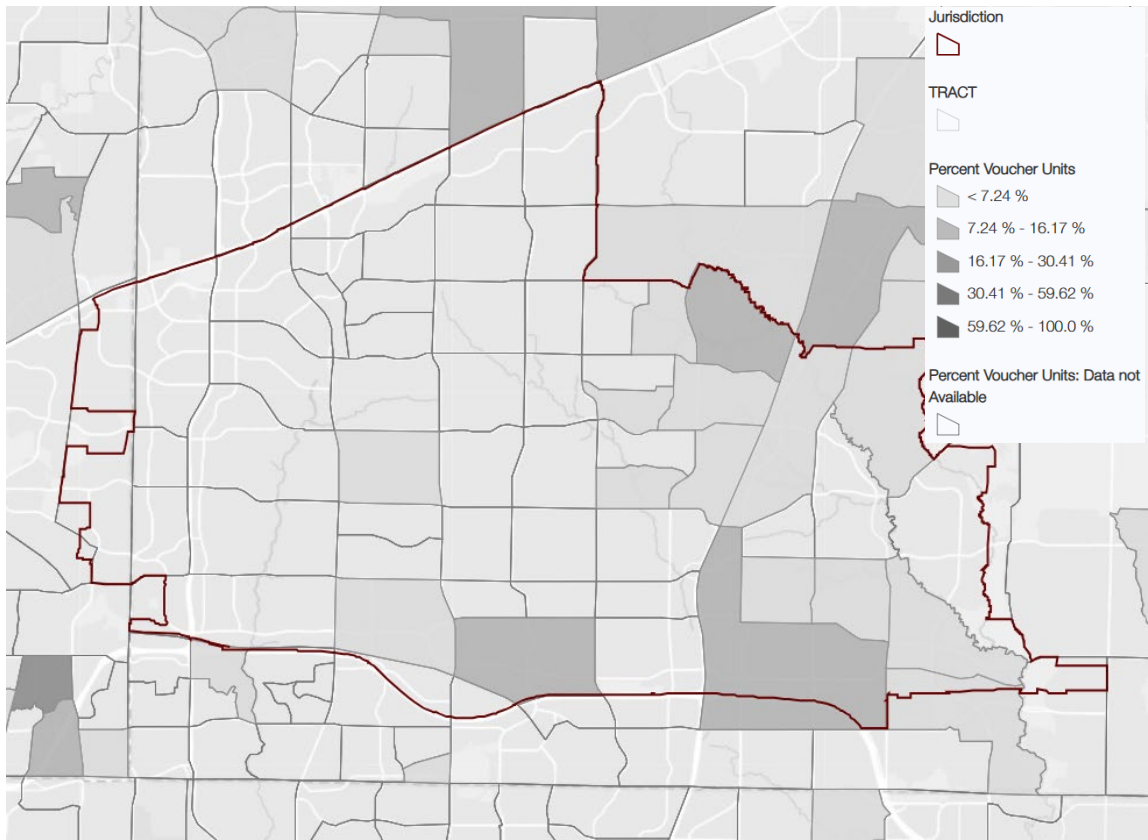
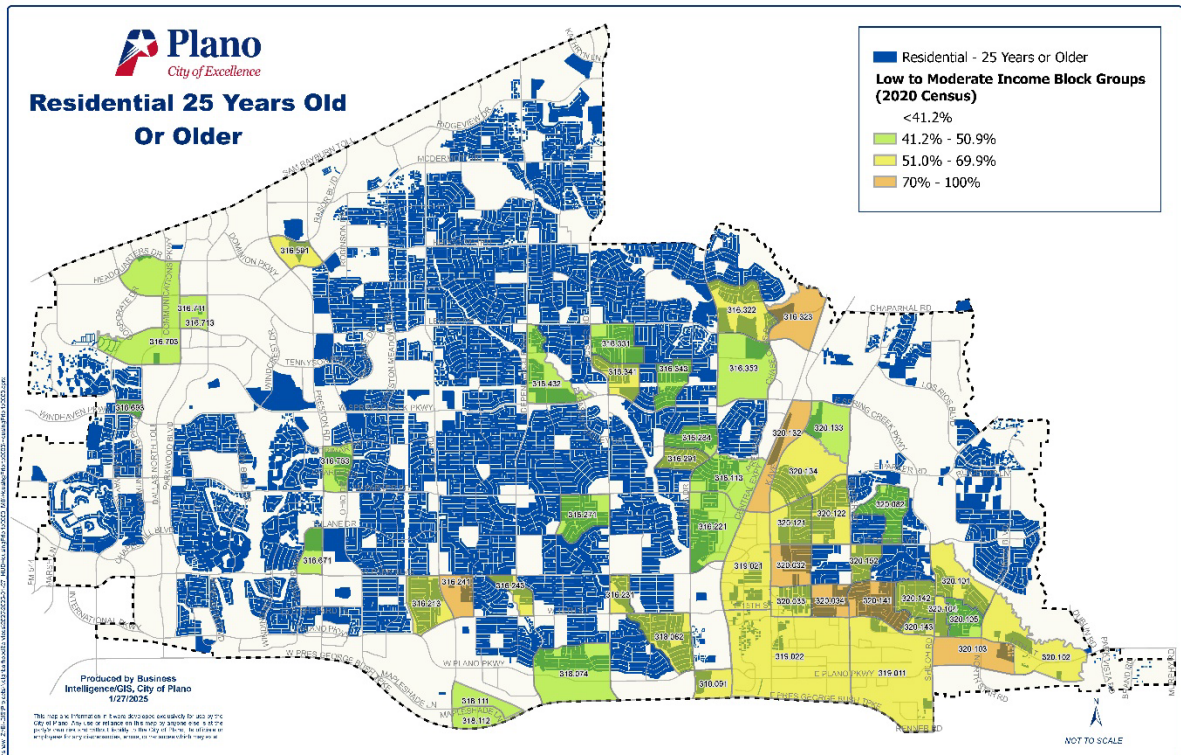


Figure 3-36



R. HOUSING PROBLEMS

According to HUD, A household is identified as having a housing problem if they have any one or more of these four problems:

- Lack of complete kitchen facilities,
- Lack of complete plumbing facilities,
- Household is overcrowded which means there are more than 1.5 persons per room, excluding bathrooms, porches, foyers, halls, or half-rooms, and
- Household is cost-burdened (paying more than 30 percent of their income for housing).

Analyzing housing problems highlights areas where deferred maintenance has resulted in condition problems and eroded the housing stock. The HUD AFFH data indicates that 29,115 households have one or more housing problems, accounting for 27.13% of the total households in Plano. Proportionally, more African American (38.3%) and Hispanic (38.8%) households are experiencing greater housing problems compared to the other racial/ethnic groups in the city (Figure 3-37). Note that the latest available HUD AFFH data utilizes CHAS 2016 to 2020 data, though the latest CHAS data is CHAS 2017-2021.

The concentration of households with one or more housing problems also varies geographically. Areas with proportionally more households experiencing housing problems overlap with neighborhoods with higher shares of rental units that are affordable and lower household incomes in Plano, as well as the city’s neighborhoods designated as Low to Moderate Income Block Groups, according to the 2020 Census data. These neighborhoods also have higher exposure to poverty, lower levels of school proficiency, and lower labor market engagement levels, as displayed in previous maps. This indicates a need for housing rehabilitation activities in these neighborhoods to improve housing conditions and preserve existing affordability, expanding the availability of fair housing options (Figure 3-38).

Figure 3-37

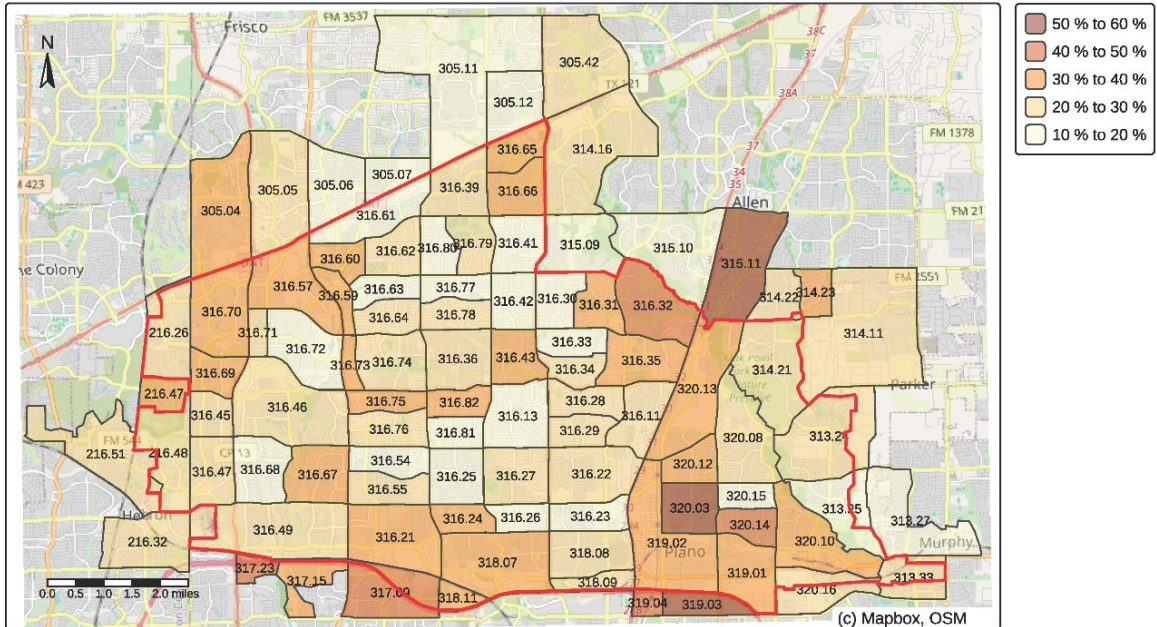
Households with One or More Housing Problems

Plano City, Texas (CHAS 2016-2020)

| | Households with One or More Housing Problems | |
|------------------------|--|--------------|
| | Count | Percent |
| Total | 29,115 | 27.1% |
| White | 15,617 | 24.5% |
| Black | 3,549 | 38.3% |
| Native American | 70 | 26.7% |
| Asian/Pacific Islander | 4,904 | 24.1% |
| Other Race | NA | NA |
| Hispanic | 4,527 | 38.8% |

Source: HUD AFFH Data Version AFFHT0007, RKG Associates Inc., 2025

Figure 3-38
Percent of Households with One or More
Housing Problems (CHAS 2016-2020)
Plano City, Texas Census Tracts



S. COST BURDEN

According to the latest CHAS 2017-2021 data, 35.0% of Plano’s renter households are cost-burdened, meaning they pay more than 30% of their annual household income on housing-related costs. In comparison, 18.6% of the city’s owner households are cost-burdened according to CHAS. In addition, households earning at or below 80% of the Area Median Income (AMI) are more severely impacted by the cost burden issue. Among renters, at least 70% of the households in each income group at or below 80% of AMI are cost-burdened, making these 13,300 renter households most vulnerable to the negative impacts of rising housing costs and housing instability. Around 70% of the owner households earning at or below 50% of the AMI are also cost-burdened, totaling 4,265 households. Some of these lower-income owner households are most likely headed by retirees and seniors on fixed incomes. Due to the limited supply of attainable rental housing options and rapidly increasing housing prices, the renter households earning at or below 80% of the AMI and cost-burdened face the most severe housing challenges in Plano and have the least access to fair housing choices.

Figure 3-39
Cost Burdened Household by Income
Plano City, Texas (CHAS 2017-2021)

| % of Area Median Income | Renter | | Owner | |
|-------------------------|---------------|--------------|---------------|--------------|
| | Count | Percent | Count | Percent |
| <= 30% | 3,595 | 75.8% | 1,985 | 71.9% |
| 31% - 50% | 3,990 | 88.2% | 2,280 | 69.6% |
| 51% - 80% | 5,715 | 69.5% | 2,850 | 45.2% |
| 81% -100% | 1,305 | 23.7% | 1,395 | 32.2% |
| > 100% | 1,130 | 5.1% | 2,820 | 6.4% |
| Total | 15,735 | 35.0% | 11,330 | 18.6% |

Source: CHAS 2017-2021

T. COMPOSITE INDEX SCORE

To measure and evaluate the combined performance of all racial and ethnic groups in each census tract combining all the previously presented demographic, housing, and fair housing indexes, RKG converted the value of all indicators into index scores that align with the HUD AFFH indexes (e.g., the Low Poverty Index) in scale and range. The indicators that were converted by RKG include:

Converted Indicators

- 2023 median household income,
- 2013-2023 average annual percent change of median household income,
- percentage of the minority population,
- percentage of people with disability,
- percentage of owner-occupied housing units,
- percentage of rental units that are affordable, and
- percentage of housing units with one or more housing problems.

HUD AFFH Indexes

- Low Poverty Index,
- School Proficiency Index,
- Job Proximity Index,
- Labor Market Engagement Index, and
- Environmental Health Index.

The consultant identified the highest average index values for all census tracts for each indicator and assigned it the highest index score. Then, all other census tract values were converted to index scores as a percentage of the highest index value. In two instances (percentage of people with disabilities and percentage of housing units with one or more housing problems), the consultant assigned the highest index score to the lowest indicator value to reflect the actual meaning of the indicator. For example, the census tract with the lowest percentage of its population having a disability is considered to face fewer fair housing challenges compared to other census tracts, and this is reflected in the highest index score. As such, the higher the census tract's index score, the better its conditions were relative to the performance indicators.

The census tracts were then ranked based on their total scores, and the results (the lowest total score was ranked as 1, and the highest was ranked as 96) were then mapped in ArcGIS. The darker shading reflects a higher ranking and better fair housing opportunities, while lighter shades indicate that the census tracts face more fair housing challenges. Readers should note that this is not an absolute measurement of the fair housing opportunities across the city's neighborhoods, as the index score conversion is only an approximation aiming to bring all indicators into a comparable scale based on currently available data. Rather, this analysis provides readers with insights into the geographic concentration of fair housing issues across Plano and opportunities to start to identify neighborhoods that need additional resources to increase their fair housing availability.

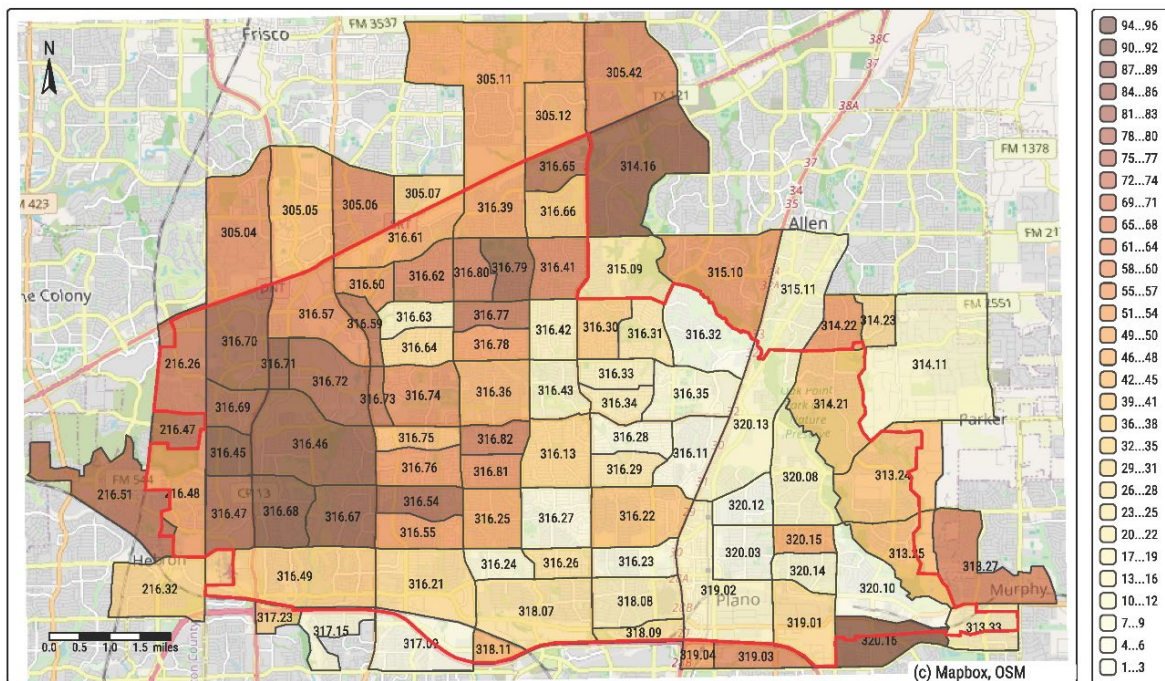
The analysis indicates that the best conditions exist in census tracts on the west and north sides of the city, which are neighborhoods with higher household incomes. The most challenged census tracts are on the east side of the city, where the rental market is relatively more attainable, coupled with a higher prevalence of housing condition issues, lower household incomes, lower levels of labor market

engagement and school proficiency, as well as a cluster of the Hispanic population. These areas generally overlap with the designated Low to Moderate Income block groups (Figure 3-40).

Recommendations

The data suggest that Plano’s low- to moderate-income neighborhoods face disproportionate barriers to fair housing choices in the city. This suggests that the city should expand additional housing options in other parts of the city and increase fair access to such options for the most vulnerable populations, especially those with low- to moderate-incomes. In addition, the city should improve fair access to housing and resources, such as employment, job training, quality education, housing rehabilitation, and homeownership in existing low- to moderate-income areas.

Figure 3-40
 Composite Index Score Ranking for Demographic & Housing Issues
 Plano City Census Tracts, Texas



4 RECORD OF HOUSING DISCRIMINATION

A. INTRODUCTION

This section examined the records of housing discrimination complaints that originated in Plano to analyze the types of existing fair housing issues. The Federal Fair Housing Act (FHA) of 1968, as amended in 1974 and 1988, prohibits housing discrimination based on race, color, religion, national origin, sex, disability, and familial status. Alleged violations of the FHA may be filed with:

- United States Department of Housing and Urban Development (HUD) Regional Office of Fair Housing and Equal Opportunity (FHEO),
- Texas Workforce Commission, The Civil Rights Division (CRD),
- United States Department of Justice (DOJ), and
- North Texas Fair Housing Center.

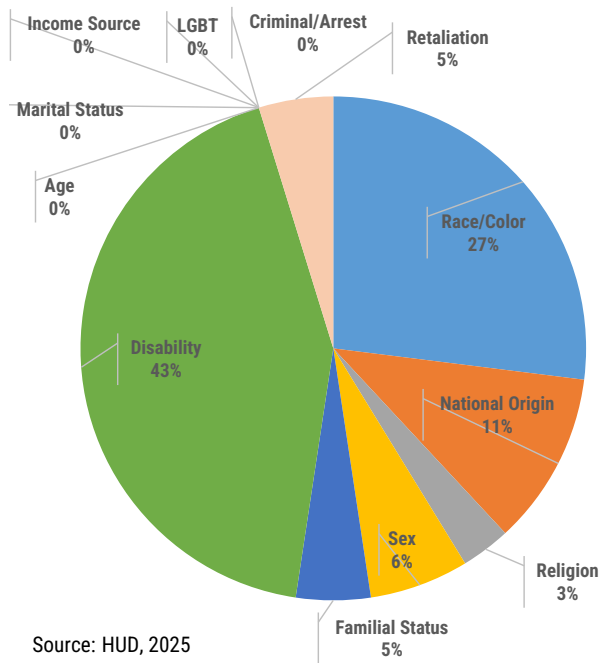
B. U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives formal complaints regarding alleged violations of the FHA filed by individuals or organizations on behalf of the individuals. The consultants requested fair housing complaint intake data filed in Plano from HUD's Region VI office in Fort Worth, Texas, in March 2025. A response along with the data requested was received in April 2025.

The consultants obtained fair housing discrimination complaints filed in Plano by category/complaint reason between January 1, 2019, and March 20, 2025, from HUD. Note that a complaint can be filed for multiple reasons. HUD has received 49 complaint intakes from Plano since 2019. Among them, 10 complaints fell under two or more categories simultaneously and, therefore, were counted once for each category (e.g., a complaint for both "Age" and "Disability" was counted once for "Age" and once for "Disability"). The most common issue was discrimination based on "Disability", accounting for 42.9%. Intakes of "Race or Color" issues were the second most common, constituting 27.0%, followed by "National Origin" at 11.1% (Table 4-1/Figure 4-1).

Complaints regarding disabilities deal with a different set of issues. For people who have a physical or mental disability (including hearing, mobility, and visual impairments, intellectual disability, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, drug addiction, chronic fatigue, learning disability, head injury, and mental illness) that substantially limits one or more major life activities, landlords may not refuse to let a tenant make reasonable modifications to the dwelling or common use areas, at the tenant's expense so the disabled person can use the housing. Landlords are also prohibited from imposing residency conditions on individuals with disabilities simply because they may need reasonable accommodations. With certain limited exceptions, the Act applies to privately and publicly owned housing, including housing subsidized by the federal government or the Section 8/Housing Choice Voucher program.

Figure 4-1: HUD Fair Housing Complaints, 2019- 2025



Source: HUD, 2025

Table 4-1

United States Department of Housing and Urban Development
Fair Housing Complaints, 2019-2025 (as of March 20, 2025)
Plano, Texas

| Category | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 (As of 3/20/2025) | Total | Percent |
|---------------------------------|----------|----------|-----------|----------|----------|-----------|------------------------|-----------|---------------|
| Race or Color | 4 | 1 | 2 | 3 | 1 | 5 | 1 | 17 | 27.0% |
| National Origin | 1 | | 2 | 1 | 1 | 2 | | 7 | 11.1% |
| Religion | | | 1 | | | 1 | | 2 | 3.2% |
| Sex (Harassment/Gender) | | | 1 | | 1 | 2 | | 4 | 6.3% |
| Familial Status | 1 | | | | 1 | | 1 | 3 | 4.8% |
| Disability | 3 | | 6 | 5 | 4 | 6 | 3 | 27 | 42.9% |
| Age and/or Other Issue | | | | | | | | 0 | 0.0% |
| Marital Status | | | | | | | | 0 | 0.0% |
| Income Source (Section 8, etc.) | | | | | | | | 0 | 0.0% |
| LGBT Issue | | | | | | | | 0 | 0.0% |
| Criminal/Arrest Issue | | | | | | | | 0 | 0.0% |
| Retaliation | | | | | 1 | 2 | | 3 | 4.8% |
| Total | 9 | 1 | 12 | 9 | 9 | 18 | 5 | 63 | 100.0% |

Source: United States Department of Housing and Urban Development, 2025

The term “major life activity” may include seeing, hearing, walking, breathing, performing manual tasks, caring for oneself, learning, speaking, or working. The Fair Housing Act also protects people who have a record of such an impairment or are regarded as having such an impairment. Current users of illegal controlled substances, persons convicted of illegal manufacture or distribution of a controlled

substance, sex offenders, and juvenile offenders are not considered disabled under the Fair Housing Act by virtue of that status.

Where reasonable, the landlord may permit changes only if the tenant agrees to restore the property to its original condition when their period of tenancy has ended. Landlords cannot refuse to make reasonable accommodations in rules, policies, practices, or services, if necessary, for the disabled person to use the housing. The Act also makes it unlawful for any person to refuse "to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford ... person(s) [with disabilities] equal opportunity to use and enjoy a dwelling."¹

In addition, it should be noted that the U.S. Department of Justice Civil Rights Division also considers the following as a violation of the Fair Housing Act regarding protections for persons with disabilities:

- Municipalities and other local government entities make zoning or land use decisions or implement land use policies that exclude or otherwise discriminate against individuals with disabilities through discrimination in housing based upon disability group homes.
- Failure "to design and construct" certain new multi-family dwellings so that they are accessible to and usable by persons with disabilities, and particularly people who use wheelchairs.²

It is illegal for housing providers – such as landlords, property managers, real estate agents, brokers, mortgage lenders, and insurance companies – to treat someone differently because of his or her actual race or perceived race or because the person is multiracial or in a relationship with someone of a different race. A housing provider may also not discriminate against a current or prospective tenant because they associate with people of a particular race. For example, a White tenant cannot be treated differently because he or she has African American guests.

Sometimes, housing providers try to disguise their discrimination by giving false information about the availability of housing, either saying that nothing was available or steering home seekers to certain areas based on race. Individuals who receive such false information or misdirection may not know that they have been victims of discrimination. Race discrimination may be closely related to color discrimination (and sometimes national origin discrimination). In some instances, an act of discrimination against someone could be considered both race and color discrimination.³

C. TEXAS WORKFORCE COMMISSION, THE CIVIL RIGHTS DIVISION

The consultants also requested fair housing complaint data from the Texas Workforce Commission, the Civil Rights Division in April 2025. No responses were received as of when this report was written in May 2025.

D. UNITED STATES DEPARTMENT OF JUSTICE

RKG requested housing discrimination complaint records for Plano since January 1, 2019, from the Civil Rights Division of the U.S. Department of Justice (DOJ) in April 2025 in the form of a Freedom of

¹ Department of Justice website: <https://www.justice.gov/crt/us-department-housing-and-urban-development>

² Department of Justice website: <https://www.justice.gov/crt/fair-housing-act-1>

³ Department of Justice website: <https://www.justice.gov/crt/fair-housing-act-1#race>

Information Act (FOIA) request. RKG has received an official response from the DOJ on April 29, 2025, stating that after thorough research, they “determined that the Civil Rights Division has no records pertaining to the subject of your request”.

E. NORTH TEXAS FAIR HOUSING CENTER

According to the organization’s website, the North Texas Fair Housing Center’s mission is “to actively support and promote fair housing through education and advocacy to ensure that all persons have the opportunity to secure the housing they desire and can afford, without discrimination based on their race, color, religion, gender, national origin, familial status, disability or other characteristics protected by law.” The organization provides housing counseling, investigates housing discrimination complaints, offers financial assistance, and conducts outreach and educational programs. The Fair Housing Center investigates complaints of housing discrimination in 12 counties, including Collin County.

RKG requested housing discrimination complaint records from the North Texas Fair Housing Center in April 2025. However, RKG was informed by the City that the North Texas Fair Housing Center has been closed as of April 25, 2025. The lack of an active fair housing center serving the city in fair housing counseling, investigation, and education constitutes an impediment to fair housing for Plano.

5 REVIEW OF PUBLIC SECTOR POLICIES

A. INTRODUCTION

Public policies set the direction for a city's socioeconomic trends, development prospects, and priorities. They influence numerous facets of residents' lives and establish principles to distribute resources. Policies, practices, or procedures that appear neutral when taken at face value may actually deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin and create impediments to fair housing choice.

An element of the Analysis of Impediments to Fair Housing Choice includes an examination of a city's policies in terms of their impact on housing choice. This section evaluates Plano's policies to determine opportunities for accelerating the expansion of fair housing choice.

B. POLICIES GOVERNING INVESTMENT OF FUNDS FOR HOUSING AND COMMUNITY DEVELOPMENT

An examination of the city's current budget is essential for understanding how the financial resources in support of fair housing choices have increased or declined over the past few years. Plano receives federal entitlement funds directly and indirectly from HUD in the form of:

- **Community Development Block Grants (CDBG):** The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income levels. Funds can be used for a wide array of activities, including housing rehabilitation, homeownership assistance, lead-based paint remediation, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.
- **HOME Investment Partnerships Program (HOME):** The HOME Investment Partnerships Program provides formula grants to states and localities to create affordable housing for low-income households. These funds can be used for a variety of activities, including building, buying, or rehabilitating affordable housing for rent or homeownership, as well as providing direct rental assistance to low-income individuals. The program emphasizes flexibility, allowing communities to tailor strategies to their specific needs and priorities.

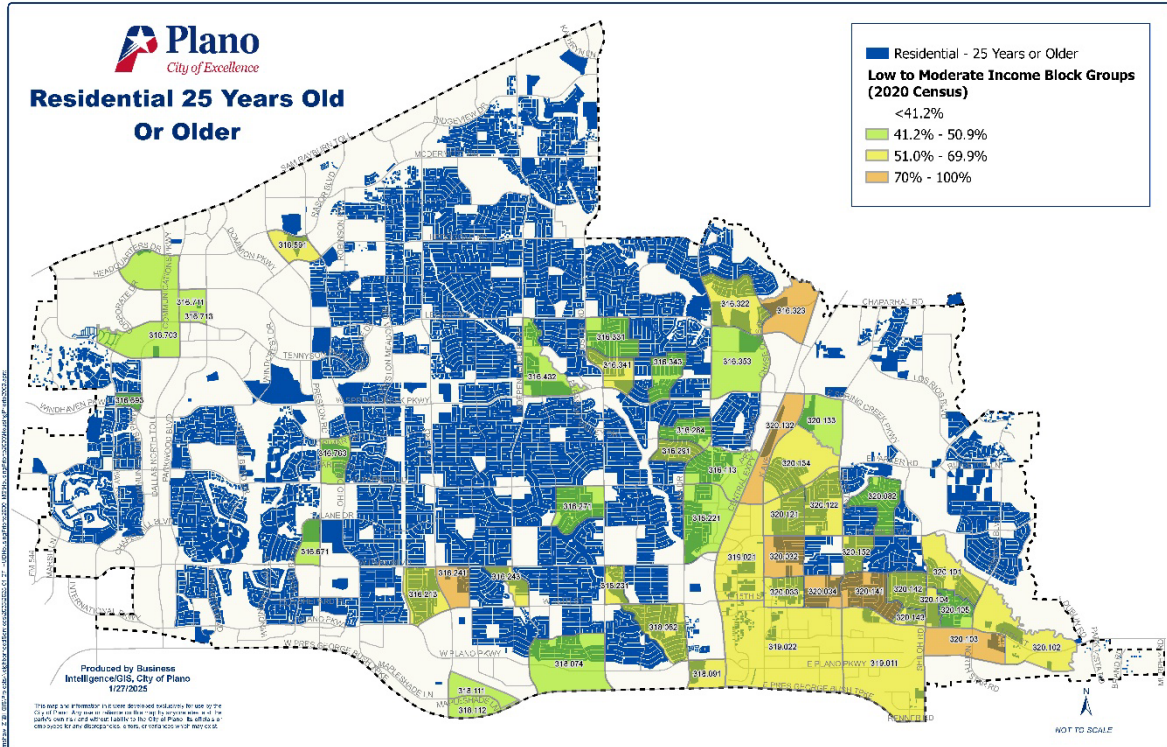
Project Funding Criteria

Funding allocations follow the principle of meeting high-priority needs across Plano for projects primarily benefiting low- and moderate-income residents. The assignment of funding priorities is based on meeting the statutory requirements of the CDBG program, input from members of housing and community services, public meetings, and public hearings. Every five years, the City of Plano is required to prepare a 5-year Consolidated Plan as a federal funding grantee, which provides guidelines for annual allocations of received funds. For each year included in the Consolidated Plan, the city is also required to prepare an

Annual Action Plan, showing how annual entitlement funds will be distributed to meet the overall 5-year goals.

Currently, low to moderate income neighborhoods mostly concentrate on the east side of Plano along U.S. Route 75, overlapping with most challenged areas with more exposure to poverty, and more limited access to resources and diverse housing options such as quality education, job training to engage better in the labor market, and attainable housing options without physical condition issues as discussed in Chapter 3 (Figure 5-1).

Figure 5-1



1. Community Development Block Grant (CDBG)

Fund Distribution

Figure 5-2 displays how the city utilized the CDBG funds by program type and allocated amounts over the last five Fiscal Years.

The CDBG Program requires that most activities benefit low- to moderate-income persons, who are defined by HUD as persons with household incomes below 80% of the Area Median Income (AMI). Most of the designated projects will directly serve Plano residents who qualify based on their income or other criteria. Projects in other areas of the city are eligible for CDBG funding if they individually benefit low- or moderate-income individuals or persons who meet other HUD criteria, including those of a presumed benefit. The city’s CDBG funding allocations have increased from \$1,408,317 in FY2020 to \$1,544,787 in FY2024, an increase of 10%. This is most likely due to the overall federal increase in spending due to the COVID-19 pandemic. Figure 5-2 presents the estimated amount of CDBG allocation from the 2020-2024

Consolidated Plan versus the actual expenditure between 2020 and 2024. The categorization is based on the outlined goals in Plano’s 2020 to 2024 Consolidated Plan.

Figure 5-2
Uses of HUD CDBG Funds FY2020-FY2024
City of Plano, TX

| Funding Category | Annual Allocation on Programs | | | | | | |
|------------------------|---|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| | CDGB Goals in Consolidated Plan 2020-2024 | 2020 | 2021 | 2022 | 2023 | 2024 | Total |
| Housing Rehabilitation | \$3,920,000 | \$871,831 | \$898,859 | \$850,759 | \$839,774 | \$882,245 | \$4,343,469 |
| Housing Development | \$0 | \$30,000 | \$0 | \$30,000 | \$0 | \$94,487 | \$154,487 |
| Homeownership | \$30,000 | \$0 | \$9,958 | \$8,000 | \$0 | \$8,000 | \$25,958 |
| Rental Assistance | \$142,500 | \$122,000 | \$121,662 | \$117,691 | \$122,000 | \$122,000 | \$605,353 |
| Homelessness | \$1,147,500 | \$45,825 | \$47,829 | \$44,332 | \$101,510 | \$115,224 | \$354,720 |
| Public Services | \$160,000 | \$56,955 | \$65,205 | \$47,402 | \$3,306 | \$11,371 | \$184,238 |
| Administration | \$0 | \$281,706 | \$293,379 | \$281,430 | \$295,930 | \$311,460 | \$1,463,905 |
| TOTAL | \$5,400,000 | \$1,408,317 | \$1,436,893 | \$1,379,613 | \$1,362,520 | \$1,544,787 | \$7,132,130 |

The majority of CDBG funding is used for programs associated with home rehabilitation, followed by administration and rental assistance. In FY 2024, \$976,732 was spent on providing rehabilitation funding for housing, indicating that this is an important priority for the City. However, compared to Plano’s Consolidated Plan 2020 to 2024, the city has less allocation for the homeownership assistance and homelessness service/prevention categories, shifting the funding for such programs to uses related to public services and housing rehabilitation. The City of Plano has a HUD-certified Housing Counselor on staff who provides housing counseling to families and individuals under its Homeownership program. However, according to the City, the First-Time Homebuyers Program has not been utilized much, as either potential applicants were not able to qualify, or there is a shortage of attainable lands and homes for potential applicants to choose from in the first place, due to the rising housing prices in Plano.

Recommendations

Improve Fund Utilization for Homeownership and Homelessness Categories

The City should consider updating the details and eligibility of the First-Time Homebuyers Program and homelessness programs, and investigate ways to improve the utilization of the funds for these two categories. The shortage of funding support for homeownership assistance and homelessness prevention and service will create impediments to fair housing choices for first-time homebuyers and the most vulnerable populations at risk of or experiencing homelessness in the city.

Include Allocations for Fair Housing

In addition, the City should consider investing in fair housing education, counseling, and enforcement services. With the North Texas Fair Housing Center closing in 2025, Plano is not currently served by any HUD-certified fair housing organization. As fair housing education and homebuying counseling are closely related and can benefit from one another, the City should consider including fair housing allocation under or in addition to the homeownership program, especially utilizing unspent funding for the homebuyer assistance program. Homebuying assistance without fair housing education would not achieve the optimal goal of increasing fair housing access for all residents, especially people from lower-income and minority communities, as they generally face more housing discrimination in the homebuying process.

Expanding Available Local Funding for Housing

The City should enhance funding to prioritize issues related to increasing housing opportunities and access via new housing development, rehabilitation, and fair housing education/homebuying counseling/financial literacy. As part of the Plano Housing Study, a number of recommendations were put forward towards addressing the funding gap. One such example is that the City should consider expanding its housing development and rehabilitation capacity by establishing a Housing Rehabilitation Fund. The rehabilitation fund would provide loans to property owners to help defray the costs of property condition issues. The loan can take several forms, ranging from low-interest or no-interest loans to partially forgivable or 100% forgivable loans. The fund could potentially be capitalized through an increase in rental registration fees.

Another potential recommendation for housing involves issuing a Housing Opportunity Bond (HOB). An HOB is a publicly sponsored bond where the principal value is used to subsidize the development of deed-restricted housing. Effectively, the bond amount is used to provide gap assistance to new developments that will include deed-restricted housing. The bond fund could be capitalized from a dedicated tax millage, rental registration fees, or grants.

A third approach for increasing funding for housing would be to create a general obligation affordable housing bond that private investors could purchase. The general obligation would require the City to carry the financial risk, but would enable it to receive the capital to potentially fund development projects across the city.

2. HOME Investment Partnerships Program

Fund Distribution

Figure 5-3 displays how the city utilized the HOME funds by program type and allocated amounts over the last five Fiscal Years.

Figure 5-3
 Uses of HUD Home Funds FY2020-FY2024
 City of Plano, TX

| Funding Category | Annual Allocation on Programs | | | | | | | Total |
|--------------------------------|---|------------------|------------------|------------------|------------------|------------------|--------------------|-------|
| | HOME Goals in Consolidated Plan 2020-2024 | 2020 | 2021 | 2022 | 2023 | 2024 | | |
| Housing Rehabilitation | \$500,000 | \$241,913 | \$191,691 | \$268,064 | \$182,774 | \$182,548 | \$1,066,990 | |
| Housing Development | \$875,000 | \$0 | \$179,773 | \$167,624 | \$170,501 | \$405,513 | \$923,412 | |
| Homeownership | \$750,000 | \$0 | \$150,000 | \$150,000 | \$0 | \$0 | \$300,000 | |
| Tenant-Based Rental Assistance | \$383,750 | \$253,165 | \$0 | \$0 | \$0 | \$0 | \$253,165 | |
| Homelessness | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | |
| Administration | \$0 | \$55,023 | \$54,853 | \$33,016 | \$60,502 | \$52,159 | \$255,552 | |
| TOTAL | \$2,508,750 | \$550,101 | \$576,317 | \$618,704 | \$413,777 | \$640,220 | \$2,799,120 | |

HOME funds can be utilized for various activities aimed at supporting affordable housing for low-income households. These include the development of new housing, rehabilitation, and acquisition of affordable units for rent or homeownership. Additionally, HOME funds can provide down payment and closing cost assistance to eligible homebuyers, tenant-based rental assistance, and cover relocation costs associated with housing projects. They can also be used to establish loan guarantee accounts and cover

administrative and planning expenses, ensuring comprehensive support for affordable housing initiatives.

The City's HOME funding allocations have increased from \$550,101 in FY2020 to \$640,220 in FY2024, an increase of 16%. This is most likely due to the overall federal increase in spending due to the COVID-19 pandemic. In FY2024, the City spent \$588,061 on housing rehabilitation projects using HOME funds, again indicating the importance of housing rehabilitation within the city. However, there are limited allocations for the homeownership program.

It is important to note that, according to information shared by City staff in May 2025, Plano's City Council decided to discontinue the Downpayment Assistance Program and funding for acquisition, rehab, or resale activities. The City Council did not approve a Downpayment Assistance Program (DPA) or funding for acquisition, rehab, or resale activities for the 2025-2029 Consolidated Plan Priorities and Goals. However, the City Council decided to allow the City to continue to use the remaining \$150,000 of previously approved funds for the DPA. The existing acquisition, rehab, and resale projects that are underway can still go forward, but no new projects of this kind will be added. These changes will create a significant impediment to fair housing choices in Plano. However, also note that if the newly elected City Council (elected in early May 2025) decides to approve a substantial amendment to allow for these discontinued activities, then it would be updated to the 2025-2029 Consolidated Plan Priorities and Goals.

Recommendations

Reinstate Downpayment Assistance Program and Funding for Acquisition, Rehabilitation, and Resale Activities

The discontinuation of these programs will create a significant impediment to fair housing choices in Plano. It is strongly recommended that the newly elected City Council reinstate these programs and funding to ensure the city and residents are well served in the face of rising housing prices.

Update The Homebuyer Assistance Program and Improve Fund Utilization

As discussed earlier, funding for the homeownership program is not well utilized due to a lack of qualified applications and feasible housing options, according to the City. The City should consider consolidating and updating the homeowner assistance program under both CDBG and HOME by realistically loosening restrictions and eligibility based on Plano's current housing market.

Expand the Allocation and Capacity for Housing Development

Across CDBG and HOME funds, the City's allocations for new housing construction or development activities fall behind housing rehabilitation. The City should consider focusing HOME allocations for this purpose to increase its attainable housing units. This can help increase the utilization of the homeownership program and eventually help lower the funding needs for other housing assistance in the long run by providing price diversity. The current allocation for housing development purposes is for the Habitat for Humanity of Collin County on acquisition, rehabilitation, resale, and new construction. The City should consider expanding its housing development capacity by fostering additional partnerships with for-profit and non-profit mixed-income and attainable housing developers.

1. Plano Housing Authority

The Plano Housing Authority (PHA) is dedicated to providing affordable housing solutions to low-income residents in Plano, Texas, and the surrounding Collin County. PHA manages various public housing programs, including the Housing Choice Voucher Program, which offers rental assistance to eligible families, seniors, and individuals with disabilities. The authority also oversees the application process, eligibility guidelines, and resources to ensure that residents have access to safe and decent housing. The PHA's mission is to enhance the quality of life for its residents by promoting self-sufficiency and community development through supportive services and partnerships.

In addition to managing public housing, the Plano Housing Authority actively works to expand housing opportunities and improve living conditions for its residents. This includes growing the supply of affordable units (through Public Service Corporation units), providing educational and employment resources, and collaborating with local organizations to offer comprehensive support services. PHA also focuses on fair housing practices and equal opportunity, ensuring that all residents have access to housing without discrimination. By fostering a supportive and inclusive environment, the Plano Housing Authority plays a crucial role in building a stronger and more resilient community.

B. PUBLIC HOUSING AND SECTION 8 VOUCHER PROGRAMS

The PHA is responsible for the administration of the Section 8 Housing Choice Vouchers. Figure 5-4 shows the publicly assisted housing projects in Plano by category. The city has around 4,547 publicly assisted rental housing units, which were created via a number of programs. Over the last two decades, the PHA has divested itself of owning a number of scattered site properties and transitioned towards providing vouchers to households in need. Additionally, the PHA has used Chapter 303 of the Local Government Code of Texas to create Public Facility Corporations (PFC), which enable local governmental entities to provide tax exemptions to multifamily developments in exchange for affordability requirements. The agreement requires developers to set aside at least 50% of units for income-restricted tenants making less than 80% of the area median income and, in exchange, receive 100% property and sales tax exemptions. In Plano, there have been 2,423 units created via the PFC process.

Figure 5-4
Active Income-Controlled Housing Units
Plano, TX

| | Target Tenant Type | Income- Controlled Units | Earliest Expiration Year |
|---|--------------------|-----------------------------|-----------------------------|
| Housing Voucher | | 212 | |
| Housing Voucher (76 overlap with the units below) | N/A | 212 | N/A |
| HUD Project Rental Assistance Contracts (PRAC)/Section 202/Section 8 | | 438 | |
| Plano Community Homes East Campus | Elderly/Disabled | 129 | 2042 |
| Plano Community Home West Campus | Elderly | 167 | 2036 |
| Pioneer Place Senior Housing | Elderly | 134 | 2046 |
| Collin County Community Homes | Disabled | 8 | 2043 |
| LIHTC | | 1,729 | |
| Patriot Park Family | Family | 111 | 2044 |
| Tuscany Villas | Elderly/Disabled | 90 | 2041 |
| Gala At Premier | Elderly/Disabled | 77 | 2052 |
| Garden Gate Apartments | Individual/Family | 240 | 2025 |
| Evergreen at Plano Independence Senior Community | Elderly/Disabled | 250 | 2036 |
| The Plaza at Chase Oaks | Elderly/Disabled | 240 | 2036 |
| The Veranda Townhomes | Individual/Family | 20 | 2050 |
| Villas of Mission Bend | Elderly | 101 | N/A |
| Villas at Plano Gateway Senior Living | Elderly | 233 | N/A |
| Mariposa Apartment Homes | Elderly | 108 | N/A |
| Parmore Jupiter Road | Elderly | 80 | N/A |
| K Avenue Lofts (also State Tax Exempt) | General | 179 | N/A |
| State Tax Exempt (Owned by Public Service Corporation) | | 2,423 | |
| K Avenue Lofts (also used LIHTC) | N/A | 179 | N/A |
| Steeplechase | N/A | 188 | N/A |
| Fairfield Legacy Plano LP (Opal Legacy) | N/A | 158 | N/A |
| Enclave Gateway | N/A | 177 | N/A |
| Bel Air 16 | N/A | 78 | N/A |
| Oak Tree Village | N/A | 139 | N/A |
| Latitude | N/A | 154 | N/A |
| Alexan Legacy (Jada) | N/A | 196 | N/A |
| McDermott 55 Crossing/Park | N/A | 241 | N/A |
| Bel Air Oaks | N/A | 242 | N/A |
| Collin Creek | N/A | 161 | N/A |
| Thornbury at Chase Oaks | N/A | 192 | N/A |
| Avalon at Chase Oaks | N/A | 167 | N/A |
| Summers Crossing | N/A | 151 | N/A |

Source: National Housing Preservation Database, Texas Department of Housing and Community Affairs, and Plano Housing Authority, 2025

A total of 501 households are utilizing Section 8 Housing Vouchers obtained from the PHA. This translates into 1,105 people, of whom 63% were Black and 28% were White, and 8% were Hispanic/Latino. Female households were by far the largest group, accounting for 77% of all households. Holders of Section 8 Housing Vouchers can utilize the vouchers to attain housing within a 25-mile radius of the PHA (Figure 5-5).

Figure 5-6 presents demographic data on the Section 8 Housing Voucher Waitlist. An estimated 1,233 applicants/households are currently on the waiting list for the Housing Choice Vouchers program. Most of these households that applied have extremely low incomes (77.5%). Around 87% of the applicant households are Black, followed by White applicants (6.2%). Around 13.1% of these households on the public housing waiting list have someone in their households with disabilities. Currently, the waitlist is closed, and based on information from the PHA, some applicants may face years of waiting time depending on their situation.

According to the PHA’s Housing Choice Voucher Administration Plan, the PHA does not currently administer any type of targeted funding for a specific category of applicants on the waiting list. The PHA will give priority to families who were previously terminated from the HCV program due to a lack of funding. Throughout the fiscal year, the PHA will track its progress in meeting the Extremely Low Income (ELI) requirement. To comply with this requirement, extremely low-income families may be selected ahead of other eligible applicants as needed. Households will be chosen from the waiting list based on the selection preferences they qualify for, following the PHA’s established preference hierarchy, if applicable. Within each preference group, applicants will be selected on a first-come, first-served basis, determined by the date and time the PHA receives their completed application.

Given that the Black residents accounted for only 9.0% of Plano’s total population in 2023, according to the U.S. Census American Community Survey data (as discussed in Chapter 3), it suggests that there is a disproportionate demand from the Black residents for the PHA’s Section 8 program. Similarly, there is also a concentration of family households and households headed by females in the PHA’s Section 8 program, and this will most likely continue based on the waitlist data. This means that proportionally,

Figure 5-5
Section 8 Housing Voucher (Housing Choice Voucher, Project-Based, Veterans Affairs Supportive Housing) Participant Demographic
Plano Housing Authority, TX

| | Count | Percent |
|--------------------------------|--------------|---------------|
| Total Persons | 1,105 | 100.0% |
| White | 306 | 27.7% |
| Black | 692 | 62.6% |
| American Indian/Native Alaskan | 1 | 0.1% |
| Asian/Pacific Islander | 22 | 2.0% |
| Mixed | 24 | 2.2% |
| Other | 49 | 4.4% |
| Declined to Report | 11 | 1.0% |
| Hispanic/Latino | 89 | 8.1% |
| Households | 501 | 100.0% |
| Male Heads of Household | 115 | 23.0% |
| Female Heads of Household | 386 | 77.0% |

Source: Plano Housing Authority, TX, 2025

Figure 5-6
Section 8 Housing Voucher Waitlist Demographic
Plano Housing Authority, TX

| | Count | Percent |
|-------------------------------------|--------------|---------------|
| Households by Race/Ethnicity | 1,233 | 100.0% |
| White | 77 | 6.2% |
| Black | 1,073 | 87.0% |
| American Indian/Native Alaskan | 13 | 1.1% |
| Asian/Pacific Islander | 3 | 0.2% |
| Mixed | 36 | 2.9% |
| Other | 31 | 2.5% |
| Hispanic/Latino | 41 | 3.7% |
| Households by Type | | |
| Elderly | 51 | 4.1% |
| Near Elderly | 41 | 3.3% |
| Disabled | 161 | 13.1% |
| Family | 1,024 | 83.0% |
| Households by Income | | |
| High Income | 10 | 0.8% |
| Low Income | 32 | 2.6% |
| Very Low Income | 236 | 19.1% |
| Extremely Low Income | 955 | 77.5% |

Source: Plano Housing Authority, TX, 2025

more Black residents, family households, and households headed by females, especially those with extremely low incomes, are the most vulnerable populations facing the most significant barriers to fair housing choices in Plano. The unmet demand (those currently on the waitlist) is at least over 1,230 households.

C. PRIVATE HOUSING PROGRAMS

The City of Plano currently invests in some housing programs, however, the need for programmatic support outstrips the current funding and capacity to deliver services to low- and moderate-income households. The following programs focus on private-sector housing:

First-Time Homebuyers Program - The First-Time Homebuyer Program is designed to assist eligible low and moderate-income households to buy a home in Plano by providing down payment and closing costs assistance in the form of deferred payment loans. The United States Department of Housing and Urban Development (HUD) funds this program and with the following eligibility requirements:¹

- A homebuyer must not have owned a home in the last three years.
- Total household income must be 80% or less of the Area Median Income based on HUD income limits.
- Cash assets must be less than \$36,000 (not including retirement accounts).
- The Homebuyer(s) and spouse(s) must have a minimum credit score of 620.
- Must be a United States citizen or a permanent resident alien.
- Maximum home purchase price/value cannot exceed \$418,000 per HUD limits.

Based on meeting the above criteria, a Plano household becomes eligible for two types of down payment assistance, the first type of assistance comes from Community Development Block Grant (CDBG) funding and provides a maximum of \$10,000 at a 0% interest rate, this is a forgivable loan which has a 5-year affordability period. The second type of assistance is the HOME Investment Partnership Program, which provides up to \$55,000 at a 0% interest rate that is forgivable, subject to a 15-year lien on the property. The program is administered through the Department of Neighborhood Services and has an annual budget of \$150,000.

However, as discussed earlier, the allocations for homeownership assistance were lower than what is outlined in Plano's Consolidated Plan 2020 to 2024. According to the City, the First-Time Homebuyers Program has not been utilized much, as either potential applicants were not able to qualify, or there is a shortage of attainable lands and homes for potential applicants to choose from in the first place, due to the rising housing prices in Plano.

The Great Update Rebate - The Great Update Rebate was created to assist Plano homeowners with the financial burden of caring for homes 35 years or older. The program provides up to \$5,000 per property per 12 months for rehabilitation efforts. The program requires the homeowner to spend, at a minimum, \$20,000 on updates (based on a listing of allowable repairs) to the exterior of their home (with an exception for some approved interior mobility improvements).

¹ <https://www.plano.gov/903/First-Time-Homebuyers-Program>

This program is designed to help households that cannot afford the full cost of a major repair. This is particularly true with regard to fixing sewer pipes under a home. The typical service life of a sewer line is around 50 years, and many of the homes built prior to the 1980s are experiencing problems with broken sewer lines.

The program is administered through the Department of Neighborhood Services and has an annual budget of \$500,000. Annually, about 100 households are assisted by the program, with about 1,000 households receiving funding over the last decade.

Housing Development Assistance Through Housing Tax Credits - Historically, the City of Plano offered support to developers of affordable housing who use housing tax credits. The Texas Department of Housing and Community Affairs (TDHCA) administers the tax credit program for the state of Texas. TDHCA requires that a City Council issue a Resolution of Support (9% tax credit applications) or a Resolution of No Objection (4% bond applications) for the applications to be eligible for tax credits or bond financing through the state.

The Resolution of Support issued by the City of Plano is specifically related to potential financing only and makes no finding regarding either the suitability of the proposed development site or compliance with the City's development regulations, and approval of the resolution will not be construed as a development permit or approval.² Currently, the City of Plano has stopped providing resolutions of support for housing tax credit projects pending recommendations from the Housing Plan.

The Housing Rehabilitation Program - The Housing Rehabilitation Program assists income-eligible homeowners with housing repairs. The program is funded by the Community Development Block Grant (CDBG) and the HOME Investment Partnerships (HOME). The program provides funding for emergency repairs, limited repairs, gut rehabilitation, and reconstruction projects. The annual budget for the program is \$1,000,000, and many Plano households have been helped by the program over the years. The funds are provided to the property owners as either a 10-year partially forgivable loan (for owner-occupied units) or a 10-year 100% payable loan (for renter-occupied units).

Homeless Services - The Rapid Re-Housing program is a new program funded through the State of Texas entitlement grant funds that provides short-term rental assistance and services. The goals of the program are to help people obtain housing quickly, increase self-sufficiency, and stay housed. It is offered without preconditions (such as employment, income, absence of criminal record, or sobriety), and the resources and services provided are typically tailored to the needs of the person. The budget for this program is \$200,000.

Housing Developer Assistance - The City of Plano provides limited grant funding to non-profit developers to build housing and/or perform acquisition, rehabilitation, and resale projects for purchase by income-qualified homebuyers. The annual budget for this program is between \$200,000 and \$250,000 and is funded via HOME funds.

D. LAND USE AND COMPREHENSIVE PLANNING

The Plano 2021 Comprehensive Plan is a detailed study that provides a framework to guide the city's development over the next two to three decades. It builds upon previous planning efforts, addressing key

² <https://www.plano.gov/916/Housing-Development-Assistance>

issues such as land use, transportation, housing, economic development, and sustainability, and provides specific policies and action steps. These policies are aimed at ensuring balanced growth, enhancing quality of life, and maintaining economic resilience while adapting to the city's status as a mature, largely developed urban area.

The plan emphasizes redevelopment and growth management by promoting sustainable urban planning, improving transportation infrastructure, and revitalizing aging retail centers and neighborhoods. Housing diversity is a key focus, encouraging a mix of housing types to accommodate changing demographics, including younger professionals and aging residents. Transportation strategies include expanding bike lanes, improving public transit, and implementing smart traffic management to enhance mobility and reduce congestion. Additionally, the plan incorporates environmental policies, such as water conservation, waste minimization, and stormwater management, to support long-term sustainability.

A major feature of the plan is the Future Land Use Figure, which categorizes different areas of the city based on their development potential, zoning requirements, and environmental impact. The plan also emphasizes community engagement, ensuring that local residents and businesses have a voice in shaping the city's future. By integrating smart growth strategies, economic diversification, and sustainability initiatives, the plan hopes to help Plano maintain its reputation as a leading city for business, education, and quality of life.

Recommendations

The Comprehensive Plan outlines several key housing strategies aimed at addressing the city's evolving needs. One major focus is on diversifying housing options to accommodate different income levels, family sizes, and lifestyles. This includes promoting the development of affordable housing, mixed-use developments, and higher-density residential areas. The plan also emphasizes preserving existing neighborhoods by maintaining their character and enhancing infrastructure to support sustainable growth. The strategy also includes incentives for developers to create housing that meets the needs of Plano's diverse population, including seniors and low-income families.

To capitalize on the recommendations from the Comprehensive Plan, the City of Plano needs to prioritize housing needs and address them in a systematic way. Currently, significant opposition exists to the creation of multifamily housing, even though there is considerable need. Greater investment in education and messaging can help the city actualize the goals and strategies outlined in the Comprehensive Plan.

E. ZONING

Plano currently has 16 residential zoning districts and three commercial districts that allow for residential development. Below is a summary of the requirements associated with each of the districts:

- Agriculture (A) - The Agricultural district is intended to provide for farming, dairying, pasturage, horticulture, animal husbandry, and the necessary accessory uses for the packing, treating, or storing of produce. This zoning category also allows for a caretaker/guard's residence.³
- Estate Development (ED) - The ED district is designed for single-family homes in rural or ranch-like settings, accommodating limited ranching activities and necessary residential uses.⁴ It

³ <https://content.civicplus.com/api/assets/aa1e34e7-c4cd-4dcd-91ed-1e77696b61cf?cache=1800>

⁴ <https://content.civicplus.com/api/assets/e9abe0b7-9934-4ada-9c21-c3294d1305ea?cache=1800>

mandates specific area, yard, and bulk requirements, such as minimum lot sizes of 43,560 square feet for general single-family development. Other permitted uses include various residential, commercial, and institutional activities, with some requiring specific use permits.

- General Residential (GR) - The GR district is designed for infill residential development that aligns with the unique character of the Douglass Community near downtown Plano.⁵ It includes standards compatible with existing neighborhood structures and lot configurations. The district mandates specific area, yard, and bulk requirements, such as a minimum lot size of 3,000 square feet for single-family residences and 6,000 square feet for two-family residences.
- Mobile Home (MH) - The MH District is intended for the development of mobile home or trailer parks in a coordinated, well-designed urban setting.⁶ The district mandates specific area, yard, and bulk requirements, including a minimum lot size of 4,500 square feet. Additional requirements include minimum lot widths of 40 feet for interior lots and 45 feet for corner lots, and a minimum lot depth of 95 feet. The district also specifies setbacks, building heights, and parking requirements to ensure orderly development. Special provisions include a minimum area of 10 acres for mobile home parks and restrictions on the placement of accessory buildings.
- Multifamily Residence (MF) - The Multifamily Residence-1 (MF-1), Multifamily Residence-2 (MF-2), and Multifamily Residence-3 (MF-3) Districts are designed to accommodate condominiums and apartments at varying densities. The MF-1 district supports a density of 12 residential units per acre with a minimum lot size of 8,400 square feet.⁷ The MF-2 district allows for 18 residential units per acre, also requiring a minimum lot size of 8,400 square feet.⁸ The MF-3 district permits a higher density of 21.5 residential units per acre, with the same minimum lot size of 8,400 square feet.⁹ Each district includes specific area, yard, and other requirements to ensure appropriate development, with considerations for usable open space, landscaping, and access to major thoroughfares.
- Patio Home (PH) - The PH District is designed for detached, single-family homes in a clustered lot pattern with common usable open space. It mandates specific area, yard, and other requirements, including a minimum lot size of 4,000 square feet under standard requirements, 3,800 square feet with Stormwater Incentive Option 1, and 3,600 square feet with Stormwater Incentive Option 2.¹⁰ The district also specifies setbacks, building heights, and parking requirements to ensure orderly development. Special provisions include maintenance requirements for common areas and usable open space equal to at least 10% of the gross platted area.
- Residential Community Design (RCD) - The RCD District is intended for small lot residential development, reinforcing neighborhood character and ensuring well-connected street and pedestrian networks. It mandates a minimum district size of 5 acres and a residential density of 10 to 20 dwelling units per acre.¹¹ The district includes various housing types, each with specific area, yard, and bulk requirements. For example, Tier One housing types like single-family residences require a minimum lot size of 3,000 square feet, while Tier Two types like townhomes require 1,200 square feet. Tier Three types, such as manor homes, require 5,000 square feet for three units, with an additional 1,000 square feet for each extra unit. The district also emphasizes usable open space, connectivity, and compatibility with surrounding neighborhoods.

⁵ <https://content.civicplus.com/api/assets/2923397a-3e76-4289-9589-912582bc9bdd?cache=1800>

⁶ <https://content.civicplus.com/api/assets/16b655ee-75c5-4c2a-abc8-a16093e81223?cache=1800>

⁷ <https://content.civicplus.com/api/assets/f9448491-70ab-4f88-a223-95f319bd60dd?cache=1800>

⁸ <https://content.civicplus.com/api/assets/feede00b-6426-46f1-b0d1-5cc89811efb9?cache=1800>

⁹ <https://content.civicplus.com/api/assets/87592516-9077-4ea6-8b6b-21d648ae0f76?cache=1800>

¹⁰ <https://content.civicplus.com/api/assets/29a1d563-ba8d-4588-8849-fc8a8df03174?cache=1800>

¹¹ <https://content.civicplus.com/api/assets/e89eb5e3-a666-4490-afd7-c46e539bc4a3?cache=1800>

- Single-Family Residence Attached (SF-A) - The SF-A District is designed to provide a variety of medium-density residential housing types, accommodating 5 to 10 units per acre.¹² It allows for individually platted lots or multiple units on a single lot. The district mandates a minimum lot size of 2,250 square feet per dwelling unit on individually platted lots. The SF-A district also includes provisions for front, side, and rear yard setbacks, building heights, and parking requirements to ensure orderly development.
- Single-Family Residence¹³ - The Single-Family Residence-6 (SF-6), Single-Family Residence-7 (SF-7), Single-Family Residence-9 (SF-9), and Single-Family Residence-20 (SF-20) Districts cater to single-family development with different lot sizes. SF-6 requires 6,000 square feet, SF-7 needs 7,000 square feet, SF-9 mandates 9,000 square feet, and SF-20 demands 20,000 square feet. Each district has specific requirements for setbacks, building heights, and parking to ensure orderly development. The SF-20 district serves as a transitional area between rural and urban settings. Permitted uses include various residential, commercial, and institutional activities, with some needing specific use permits.
- Urban Residential (UR) - The UR District is designed for single-family detached development in an urban, pedestrian-oriented environment, particularly for infill development. The district mandates specific area, yard, and other requirements, including a minimum lot size of 5,000 square feet.¹⁴ Additional requirements include minimum lot widths of 50 feet for interior lots and 55 feet for corner lots, and a minimum lot depth of 90 feet. The district also specifies setbacks, building heights, and parking requirements to ensure orderly development. Multifamily residences lawfully constructed prior to the UR district are permitted, but any improvements must not increase the floor area or number of dwelling units.
- Central Business 1 (CB-1) - The CB-1 District is designed to support a highly concentrated business center similar to traditional downtown areas. For residential development, the district allows multifamily residences with a maximum density of 21.5 units per acre for buildings up to three stories, and up to 174 units per acre for buildings over three stories.¹⁵ The minimum lot size for residential development is 8,400 square feet, with a minimum lot width of 70 feet and a minimum lot depth of 120 feet for buildings up to three stories, and 200 feet for buildings over three stories. Each dwelling unit must have a minimum floor area of 400 square feet, with no more than 10% of the units being less than 550 square feet.
- Urban Mixed-Use (UMU) - The UMU District is designed to facilitate the development of urban mixed-use centers that promote social interaction, community identity, and efficient land use. It supports a variety of transportation options, including transit, bicycles, and walking. The district is primarily intended for large undeveloped properties suitable for higher density residential and commercial uses. The UMU district mandates specific area, yard, and bulk requirements, including a minimum lot size of 700 square feet for single-family attached units.¹⁶ There is no minimum lot size for commercial and multifamily developments. The district also specifies setbacks, building heights, and parking requirements to ensure orderly development and integration of mixed-use spaces.
- Downtown Business/Government (BG) - The BG District supports a mix of residential, commercial, and governmental uses in a pedestrian-oriented environment. For residential development, the district allows multifamily residences and single-family attached units. Multifamily residences have no minimum lot size and must maintain a minimum density of 40

¹² <https://content.civicplus.com/api/assets/3198ba44-de96-419d-82a3-977e25ee9711?cache=1800>

¹³ <https://www.plano.gov/982/Zoning-Districts-and-Uses>

¹⁴ <https://content.civicplus.com/api/assets/eca6a2c9-ca69-4729-a18c-72fb7d68a76f?cache=1800>

¹⁵ <https://content.civicplus.com/api/assets/f4525dd2-c4f7-4ebc-a35b-08caa1f1331a?cache=1800>

¹⁶ <https://content.civicplus.com/api/assets/66fb493a-ca7b-4458-8ebc-c29f4caa7bad?cache=1800>

dwelling units per acre, with specific floor area requirements for different unit types.¹⁷ Single-family attached units require a minimum lot size of 700 square feet, with a maximum density of 40 dwelling units per acre. These units must be on individually-platted lots and include specific requirements for setbacks, building lengths, and parking.

Increasing residential density is a key strategy for building affordable housing and fostering vibrant, sustainable communities. Higher density allows for more efficient use of land, reducing the per-unit cost of infrastructure and utilities. For example, districts like MF and RCD accommodate higher densities, with the MF-3 district allowing up to 21.5 units per acre and the RCD district supporting 10 to 20 units per acre. This contrasts with lower-density districts like ED and SF-20, which require larger lot sizes of 43,560 and 20,000 square feet, respectively.

Higher density enables more diverse housing types to be built, such as townhomes, apartments, and condominiums, which can be more affordable than single-family homes on large lots. Through smaller lot sizes and varied housing options, homeownership and rental opportunities can become more accessible to a broader range of income levels.

Moreover, higher density promotes walkability and the efficient use of public transportation, reducing reliance on cars and lowering transportation costs for residents. The CB-1, UR, and UMU districts are designed to create pedestrian-friendly environments, enhancing community interaction and access to amenities. This integration of residential, commercial, and institutional uses within close proximity further supports affordable living by reducing travel time and expenses.

In summary, higher residential density is beneficial for creating affordable housing by optimizing land use, reducing infrastructure costs, and providing diverse housing options. It also fosters sustainable, walkable communities that enhance the quality of life for all residents.

Recommendations

Plano currently faces an urgent need for additional housing supply as demand has remained strong across the Dallas Metro Area. As a result of greater housing demand and limited developable land available, the city should review and modify its zoning ordinance to encourage more housing, especially multifamily housing developments. The following recommendations could potentially help the City of Plano improve upon its housing deficit:

- **Upzoning:** Allow higher-density residential development in areas currently zoned for single-family homes. For example, districts ED and SF-20 could be modified to permit multifamily housing, reducing the minimum lot size requirements and increasing the allowable units per acre.
- **Mixed-Use Zoning:** Expand mixed-use zoning districts like UMU to more areas, encouraging the integration of residential, commercial, and institutional uses. This promotes walkability and reduces transportation costs, making housing more affordable.
- **Accessory Dwelling Units (ADUs):** Permit ADUs in more residential districts, including SF districts, by reducing the minimum lot size requirements. ADUs provide additional housing options without requiring significant changes to existing neighborhoods.

¹⁷ <https://content.civicplus.com/api/assets/2ad8fd60-af7a-457e-959b-4330fe14195d?cache=1800>

- **Incentives for Attainable Housing Options:** Offer incentives such as tax breaks, grants, or density bonuses to developers who include attainable housing units in their projects. This can be applied to districts like MF and RCD.
- **Reduce Minimum Lot Sizes:** Lower the minimum lot size requirements in districts like GR and PH to allow for smaller, more affordable housing units. For example, reducing the minimum lot size in GR from 3,000 square feet to 2,000 square feet for single-family residences.
- **Flexible Zoning Regulations:** Implement flexible zoning regulations that allow for a variety of housing types and densities. This can include allowing townhomes, duplexes, and small apartment buildings in districts traditionally reserved for single-family homes.
- **Transit-Oriented Development (TOD):** Promote TOD zoning near public transportation hubs, allowing higher-density residential development in these areas. This can reduce transportation costs and make housing more affordable.

F. TAXES AND HOUSING AFFORDABILITY

1. Property Tax

Collin County offers several property tax exemptions to help homeowners reduce their tax burden. One of the primary exemptions is the General Homestead Exemption, which is available to homeowners who use their property as their primary residence. This exemption reduces the taxable value of the home, thereby lowering the property tax owed. Additionally, homeowners aged 65 or older or those with disabilities may qualify for additional exemptions, such as the Over 65 Exemption and the Disabled Person Exemption. These exemptions provide significant savings, making homeownership more affordable for eligible residents.

The Over 65 Exemption offers further tax relief for senior homeowners, reducing the taxable value of their property and potentially freezing the amount of school taxes owed. Similarly, the Disabled Person Exemption provides tax breaks for homeowners with disabilities, reducing their taxable property value. Both exemptions can be combined with the General Homestead Exemption for greater savings. Homeowners must apply for these exemptions through the Collin County Appraisal District, ensuring they meet the eligibility criteria and submit the necessary documentation.

By taking advantage of these exemptions, homeowners in Collin County can effectively manage their property tax obligations and reduce their overall tax burden. These tax breaks are designed to support various groups, including seniors, disabled individuals, and those who use their property as their primary residence, promoting greater affordability and stability in homeownership.

Another property tax incentive the city has is Tax Increment Finance (TIF) zones, which are designed to stimulate economic development and reinvestment in underdeveloped areas, and last between 15 and 30 years. By leveraging future tax revenue increases from rising property values within these zones, Plano funds improvements and infrastructure projects that elevate the area's appeal and functionality.¹⁸ This approach not only enhances the local economy but also fosters growth and community pride, particularly along key transit corridors like the DART Red Line

¹⁸ <https://www.plano.gov/1900/Tax-Increment-Finance-Zone>

2. Housing Affordability

Plano's Neighborhood Empowerment Zone (NEZ) aims to boost economic development and enhance affordable housing within designated areas. By waiving fees for residential and commercial projects, the NEZ encourages investment and revitalization, making it easier for developers to undertake new projects. All development-related fees are waived for constructing or remodeling single and two-family residential and commercial development. Fees are also waived for new multifamily development or redevelopment when project costs are a minimum of \$8,000 per dwelling unit.¹⁹ This initiative supports the creation and rehabilitation of affordable housing, fostering community growth and improving the quality of life for residents. The NEZ is part of Plano's broader strategy to stimulate local economies and ensure sustainable development.

Recommendations

Though the above property tax exemption programs are positive for reducing housing costs for the most vulnerable population, they are not available to non-senior, low-income residents without disabilities. It would be ideal if the County loosened the qualification restrictions to benefit the broader low-income population. However, it should be noted that the City of Plano has no control over County-level tax relief programs. One thing that the City of Plano can do to improve public knowledge and access to these property tax relief programs is to list them as resources on the city's website, in both English and Spanish, and provide links to corresponding external sources.

G. COMMUNICATION AND OUTREACH

The City of Plano's main website has dedicated webpages for Fair Housing Information, which explains the Fair Housing Act, and list websites and resources such as a link to file housing discrimination complaints and also provides links for CDBG related programs for non-profits, which is a positive sign for the city's fair housing communication and outreach efforts.²⁰

The City of Plano has a Citizen Participation Plan (CPP), which outlines policies and procedures for citizen involvement in the planning, implementation, and assessment of CDBG and HOME programs. The CPP emphasizes the importance of public hearings, adequate information dissemination, and opportunities for citizens to comment on various plans, including the Consolidated Plan, Annual Action Plan, Consolidated Annual Performance and Evaluation Report (CAPER), Assessment of Fair Housing (AFH), and Analysis of Impediments to Fair Housing Choice (AI).²¹ The plan ensures that citizens have a voice in the development of these documents and provides guidelines for public hearings, comment periods, and the publication of plans.

The public participation process for the 2020-2024 Consolidated Plan in Plano involved several key steps to ensure community engagement and input. Initially, there were outreach efforts done to inform residents about the plan and encourage their participation through public notices, social media, and community meetings. This was done to ensure the City was able to reach a broad audience, especially

¹⁹ <https://www.plano.gov/1911/Neighborhood-Empowerment-Zone>

²⁰ <https://www.plano.gov/899/Fair-Housing>

²¹ <https://content.civicplus.com/api/assets/tx-plano/8c43166f-699e-4550-beda-96e749f02582/2020-24-citizen-participation-plan.pdf?sq=1fd4e41c-90b3-a0ad-545e-6202a0f3f7b5&scope=all>

underserved populations. The City then gathered information via surveys, focus groups, and public hearings. The survey collected information on residents' needs and priorities, while focus groups offer a platform for in-depth discussions. From the survey, the highest housing priorities were affordable rental housing, energy efficiency, and homeowner repair programs. Also, based on the survey, the groups most in need were identified as seniors and low-income households. Citizens recommended improvements in creating housing near amenities, creating moderately priced townhomes, and creating housing for seniors looking to downsize.

Recommendations

Though the above positive efforts exist for advancing fair housing access, the city should translate all of its webpage information into Spanish and list the Spanish translations along with the English version. This is because Spanish is one of the most common languages spoken among people with limited English proficiency in the city.

H. PUBLIC TRANSPORTATION

Dallas Area Rapid Transit (DART) provides comprehensive public transportation services in Plano, including buses, light rail, and paratransit services. DART's fare structure includes options for local and regional travel, with prices varying based on the type of service and duration of the pass. For example, a local day pass costs \$6, while a regional day pass is \$12.²² Monthly passes are also available, with local passes priced at \$126 and regional passes at \$192. DART's services are designed to be accessible and convenient, connecting Plano residents to various destinations within the Dallas- Fort Worth metroplex.

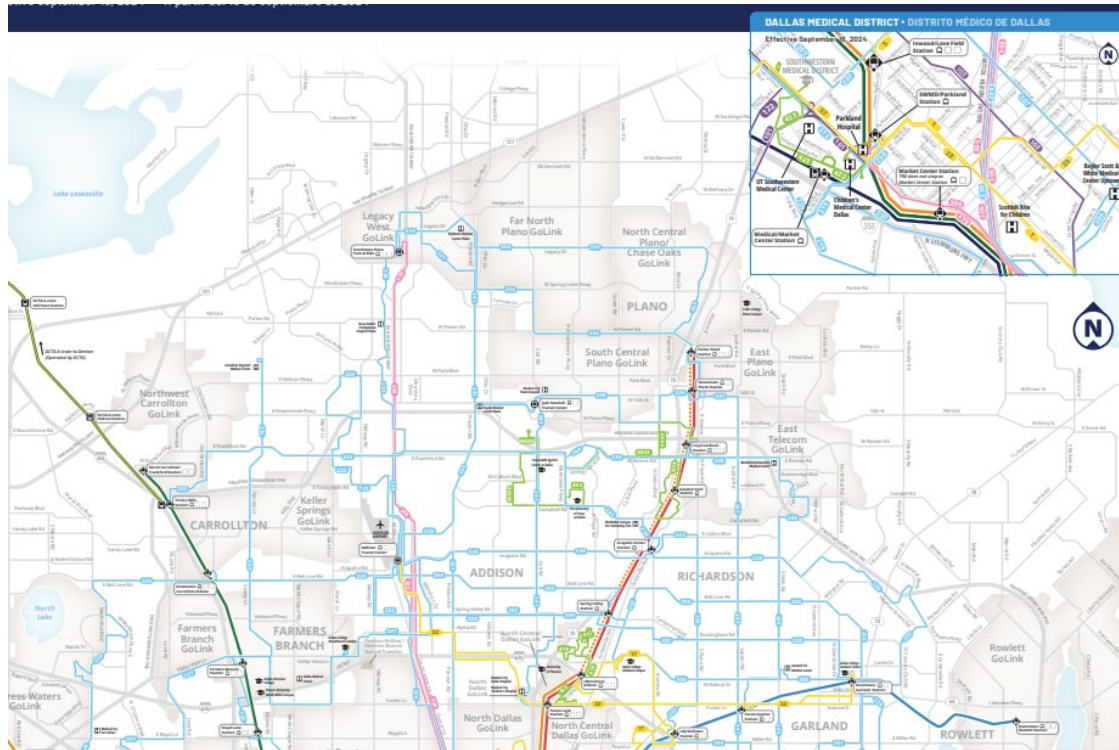
DART offers several discounts to make transportation more affordable for eligible riders. The Reduced Fare GoPass Tap Card provides a 50% discount on fares for veterans, seniors (65+), persons with disabilities, youth (ages 5-14), high school students, and college students.²³ DART also offers discount transit passes to participating employment groups, trade schools, colleges, and universities. These discounts help ensure that public transportation remains accessible to all members of the community, promoting greater mobility and economic opportunity.

DART's Paratransit Services offer curb-to-curb transportation for people with disabilities who are unable to use DART's bus or rail services. This shared-ride service operates with accessible vehicles and taxi cabs equipped with wheelchair lifts or ramps. Paratransit services are available in DART member cities, including Plano, and connect certified riders to various destinations within the service area. Eligible riders can book trips through DART's web portal or by phone, ensuring convenient access to transportation. The fares for paratransit are \$3.50 for one-way.

²² <https://www.dart.org/fare/general-fares-and-overview/fares>

²³ <https://www.dart.org/fare/general-fares-and-overview/reduced-fares>

Figure 5-7: DART System Figure



Source: DART, 2025

Recommendations

The City should conduct a comprehensive public transit need assessment to evaluate the current demand for DART's services in Plano, ensuring participation and inputs across all income levels, racial/ethnic groups, and neighborhoods.

I. RECENT FAIR HOUSING LAWSUIT

The case from 2023 involves Women's Elevated Sober Living L.L.C. (WESL), Constance Swanston, and Shannon Jones suing the City of Plano, Texas, for violating the Fair Housing Act (FHA). WESL operates a sober living home in Plano and requested an accommodation to exceed the occupancy limits set by the city's zoning ordinance, arguing that a higher occupancy was therapeutically necessary for effective recovery. The district court initially ruled in favor of WESL, allowing up to 15 residents and awarding nominal damages and attorneys' fees. However, the Fifth Circuit Court of Appeals vacated this decision, stating that the district court applied an incorrect legal standard. The appeals court held that the plaintiffs did not prove that the requested accommodation was indispensable or essential for therapeutic purposes. The appeals court vacated the district court's injunction on the City and remanded the case for further proceedings consistent with the appeals court's ruling. This ruling emphasizes the stringent requirements for proving necessity in FHA accommodation claims and the importance of demonstrating that an accommodation is essential, rather than merely beneficial, for individuals with disabilities.

6 REVIEW OF PRIVATE SECTOR PRACTICES

A. MORTGAGE APPLICATION TRENDS

RKG Associates reviewed the practices associated with access to rental housing options and home mortgage lending as part of an assessment of housing market conditions and identifying potential impediments to fair housing choices. The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals, and considering whether to purchase loans. Access to fair housing choice requires fair and equal access to the mortgage lending market regardless of race, color, national origin, religion, sex, familial status, disability, or any other statutorily protected basis.

An analysis of the mortgage applications and their outcomes can help the city to identify possible discriminatory lending practices and patterns in a community. The Home Mortgage Disclosure Act (HMDA) was originally enacted by Congress in 1975 and is implemented by Regulation C. It requires many financial institutions to maintain, report, and publicly disclose loan-level information about residential mortgages. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete and tracked by race, sex, and income of the applicant. This information is used to determine whether financial institutions are serving the housing needs of their communities.

The consultants analyzed the HMDA data for Plano for the following sections:

- Mortgage Application Trends,
- Mortgage Application Approvals by Census Tract,
- Mortgage Application Denials by Race/Ethnicity, and
- High-Cost Lending.

The following sections contain analyses of city-level data for Plano:

- Mortgage Demand and Access Index Analysis,
- Real Estate Advertising and Affirmative Marketing, and
- Housing Market Overview.

The latest HMDA data available for Plano is from 2023. This study has included three years of data from 2021 to 2023 for all types of applications received by lenders. This includes applications for all loan purposes (home purchase loans, home improvement loans, and refinancing loans) for all property types (i.e., site-built single-family homes with one to four units, site-built multi-family structures with 5 or more units, and manufactured housing units) in Plano. Figure 6-1 summarizes all the applications between 2021 and 2023 by the result, loan purpose, loan type, property type, and applicant race/ethnicity in the city.

Figure 6-1
Cumulative Mortgage Application Summary, 2021 - 2023
Plano City, Texas

| HMDB variable | Total Applications | | Originated | | Approved but Not Accepted | | Denied | | Withdrawn by Applicant | | Closed for Incompleteness | |
|--|--------------------|----------|---------------|----------|---------------------------|----------|--------------|----------|------------------------|----------|---------------------------|----------|
| | Count | Percent | Count | Percent | Count | Percent | Count | Percent | Count | Percent | Count | Percent |
| Loan Purpose | | | | | | | | | | | | |
| Home Purchase | 15,980 | 41.3% | 10,766 | 67.4% | 337 | 2.1% | 1,047 | 6.6% | 3,256 | 20.4% | 574 | 3.6% |
| Home Improvement | 2,723 | 7.0% | 1,113 | 40.9% | 99 | 3.6% | 1,121 | 41.2% | 212 | 7.8% | 178 | 6.5% |
| Refinancing | 9,418 | 24.4% | 5,523 | 58.6% | 295 | 3.1% | 1,042 | 11.1% | 1,602 | 17.0% | 956 | 10.2% |
| Cash-Out Refinancing | 7,975 | 20.6% | 4,678 | 58.7% | 204 | 2.6% | 1,068 | 13.4% | 1,402 | 17.6% | 623 | 7.8% |
| Other Purpose | 2,545 | 6.6% | 929 | 36.5% | 71 | 2.8% | 1,074 | 42.2% | 244 | 9.6% | 227 | 8.9% |
| Not Applicable | 9 | 0.0% | 888.9% | | 0 | 0.0% | 0 | 0.0% | 1 | 11.1% | 0 | 0.0% |
| sum | 38,650 | — | 23,017 | — | 1,006 | — | 5,352 | — | 6,717 | — | 2,558 | — |
| Loan Type | | | | | | | | | | | | |
| Conventional | 36,439 | 94.3% | 21,705 | 59.6% | 915 | 2.5% | 5,124 | 14.1% | 6,269 | 17.2% | 2,426 | 6.7% |
| FHA | 1,325 | 3.4% | 782 | 59.0% | 56 | 4.2% | 153 | 11.5% | 254 | 19.2% | 80 | 6.0% |
| VA | 881 | 2.3% | 530 | 60.2% | 35 | 4.0% | 75 | 8.5% | 193 | 21.9% | 48 | 5.4% |
| RHS/FSA | 5 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 1 | 20.0% | 4 | 80.0% |
| sum | 38,650 | — | 23,017 | — | 1,006 | — | 5,352 | — | 6,717 | — | 2,558 | — |
| Property Type | | | | | | | | | | | | |
| Single Family (1-4 Units);Site-Built | 38,514 | 99.4% | 22,955 | 59.6% | 1,002 | 2.6% | 5,311 | 13.8% | 6,705 | 17.4% | 2,541 | 6.6% |
| Multifamily;Site-Built | 59 | 0.2% | 52 | 88.1% | 0 | 0.0% | 0 | 0.0% | 7 | 11.9% | 0 | 0.0% |
| Manufactured Housing Unit | 77 | 0.2% | 10 | 13.0% | 4 | 5.2% | 41 | 53.2% | 5 | 6.5% | 17 | 22.1% |
| sum | 38,650 | — | 23,017 | — | 1,006 | — | 5,352 | — | 6,717 | — | 2,558 | — |
| Race | | | | | | | | | | | | |
| White | 17,951 | 46.4% | 11,224 | 62.5% | 452 | 2.5% | 2,370 | 13.2% | 2,945 | 16.4% | 960 | 5.3% |
| Black/African American | 1,772 | 4.6% | 918 | 51.8% | 49 | 2.8% | 342 | 19.3% | 329 | 18.6% | 134 | 7.6% |
| American Indian/Alaska Native | 166 | 0.4% | 91 | 54.8% | 7 | 4.2% | 39 | 23.5% | 19 | 11.4% | 10 | 6.0% |
| Asian | 10,666 | 27.6% | 6,393 | 59.9% | 256 | 2.4% | 1,353 | 12.7% | 1,899 | 17.8% | 765 | 7.2% |
| Native Hawaiian/Other Pacific Islander | 40 | 0.1% | 20 | 50.0% | 1 | 2.5% | 14 | 35.0% | 3 | 7.5% | 2 | 5.0% |
| Two or More Races | 90 | 0.2% | 34 | 37.8% | 2 | 2.2% | 26 | 28.9% | 16 | 17.8% | 12 | 13.3% |
| Some Other Race | 911 | 2.4% | 589 | 64.7% | 25 | 2.7% | 106 | 11.6% | 152 | 16.7% | 39 | 4.3% |
| Race Not Available | 7,054 | 18.3% | 3,748 | 53.1% | 214 | 3.0% | 1,102 | 15.6% | 1,354 | 19.2% | 636 | 9.0% |
| sum | 38,650 | — | 23,017 | — | 1,006 | — | 5,352 | — | 6,717 | — | 2,558 | — |
| Ethnicity | | | | | | | | | | | | |
| Hispanic or Latino | 2,703 | 7.0% | 1,504 | 55.6% | 74 | 2.7% | 529 | 19.6% | 430 | 15.9% | 166 | 6.1% |
| sum | 2,703 | — | 1,504 | — | 74 | — | 529 | — | 430 | — | 166 | — |

Source: HMDB Data and RKG Associates Inc., 2025

1. Loan Application Demand

Loan Purpose

Among the total of 38,650 mortgage applications documented between 2021 and 2023, 41.3% were for Home Purchase loans, followed by Home Refinancing (24.4%) and Cash-Out Refinancing (20.6%). Except for applications with no applicable loan purpose information, Home Purchase loan applications had the highest origination (approval) rate at 67.4% among all loan purposes, followed by Cash-Out Refinancing and Refinancing. However, Home Purchase loan applications were more likely to be withdrawn by applicants (20.4%) compared to other loan types. In addition, except for applications for Other Purpose loans, Home Improvement loan applications had the highest denial rate of 41.2%.

The data suggests that less successful access to home improvement and refinancing loans creates a barrier to housing choices with the following negative impacts:

- 1) Deterioration of Housing Quality: Without financing, homeowners may struggle to make necessary repairs or upgrades. This can lead to unsafe living conditions, reduced energy efficiency, and lower overall property values.
- 2) Reduced Property Value and Equity: Homes that are not maintained or improved may lose value over time. During this process, owners miss out on opportunities to build equity, which can be critical for financial security and wealth-building.
- 3) Barriers to Long-Term Stability: Refinancing loans can help homeowners lower interest rates or monthly payments. Without access, financially burdened homeowners may struggle to keep up with payments, increasing the risk of foreclosure.
- 4) Widening Wealth Gaps: Disparities in access can reinforce systemic inequalities, particularly for low-income families, communities of color, or residents of manufactured housing. This affects intergenerational wealth transfer and broader economic mobility.
- 5) Negative Community Effects: Neighborhoods with a concentration of homes in disrepair may experience declining community investment, reduced curb appeal, and potentially increased crime.

This indicates a need for the City to collaborate with financial and lending institutions to provide additional support to help applicants pursuing home improvement and refinancing loans complete their applications and improve access to these loan opportunities.

Loan Type

The most common type of application was for conventional loans, accounting for 94.3% of all loan types. Conventional loans, loans backed by the Federal Housing Administration (FHA), and loans insured by the Department of Veterans Affairs (VA) all have a similar approval rate of around 60%. There were only five applications for loans backed by the Farm Services Administration or Rural Housing Service (FSA/RHS). Around 80% of FSA/RHS loan applications were closed for incompleteness.

Property Type

The vast majority (99.4%) of the applications were for site-built single-family homes with one to four units. Though site-built multi-family units with five or more units in structure only had 59 applications, they had the most successful origination rate at 88.1%. Applications for manufactured housing units were the least successful, with the lowest origination rate of 13.0%, and they were more likely to be denied (53.2%) or closed for incompleteness (22.1%) compared to other property types.

Since manufactured homes often offer a more affordable route to homeownership, the data likely indicates that providing additional support during the loan application process could enhance access to homeownership for prospective buyers or help current owners maintain their manufactured homes. In addition, the data suggests there are limited options for housing types other than site-built single-family homes for homeownership in Plano, which creates a barrier to fair housing choices and homeownership opportunities, as discussed in Section 5.

Applicant Race

Proportionally more applications between 2021 and 2023 were submitted by White applicants (46.4%), who also had the second highest origination rate of 62.5%. This is followed by Asian applicants, who account for 27.6% of all applicants, with the third highest approval rate of 59.9%. All other racial and ethnic groups each make up less than 10% of all applicants, respectively.

The 90 applicants identifying as Two or More Races experienced the lowest mortgage origination rate at 37.8% and were also more likely to have their applications closed due to incompleteness, at a rate of 13.3%. In addition, Native Hawaiian/Other Pacific Islander applicants had the highest denial rate of 35.0%. Black applicants had the third lowest approval rate of 51.8%.

This suggests that racial and ethnic disparity exists for successful mortgage access in Plano. The non-White applicants, especially applicants identifying as Two or More Races, Native Hawaiian/Other Pacific Islanders, and Black/African American, were the least successful in terms of mortgage access in Plano between 2021 and 2023. In addition, the racial and ethnic distribution of loan applicants between 2021 and 2023 does not align with the 2023 racial and ethnic composition of the population in Plano (Figure 6-2). Residents identifying as Black, Two or More Races, Some Other Race, and Hispanic were underrepresented in mortgage applications between 2021 and 2023 in Plano.

This suggests that the limited access to financial opportunities such as homeownership, home improvement financing, and refinancing impedes fair housing choices in Plano, especially for these non-White populations. Mortgage application assistance and education, especially for the minority populations, would most likely help reduce barriers to mortgage access, homeownership, improved housing conditions, and fair housing opportunities in the city.

Figure 6-2

Racial and Ethnic Composition Trends 2000 - 2023

Plano City, Texas

| | 2000 | | 2013 | | 2023 | | Change 2000 - 2013 | | Change 2013 - 2023 | |
|-----------------|---------|-------|---------|-------|---------|-------|--------------------|-------------|--------------------|-------------|
| | Count | % | Count | % | Count | % | Actual Chg. | Ann. % Chg. | Actual Chg. | Ann. % Chg. |
| White | 173,761 | 78.3% | 186,058 | 69.8% | 152,819 | 53.2% | 12,297 | 0.5% | -33,239 | -1.8% |
| Black | 11,155 | 5.0% | 18,875 | 7.1% | 25,800 | 9.0% | 7,720 | 5.3% | 6,925 | 3.7% |
| Native American | 803 | 0.4% | 1,280 | 0.5% | 1,289 | 0.4% | 477 | 4.6% | 9 | 0.1% |
| Asian/HIPI | 22,692 | 10.2% | 48,710 | 18.3% | 65,151 | 22.7% | 26,018 | 8.8% | 16,441 | 3.4% |
| All Other Race | 13,619 | 6.1% | 11,817 | 4.4% | 42,280 | 14.7% | -1,802 | -1.0% | 30,463 | 25.8% |
| Hispanic | 22,357 | 10.1% | 38,818 | 14.6% | 46,572 | 16.2% | 16,461 | 5.7% | 7,754 | 2.0% |
| All Minority | 48,269 | 21.7% | 80,682 | 30.2% | 134,520 | 46.8% | 32,413 | 5.2% | 53,838 | 6.7% |

Source: Decennial Census, ACS 5-Year Estimates, RKG Associates Inc., 2025

2. Home Purchase Loan Lending Trends by Race/Ethnicity

RKG specifically examined the trends of home purchase loan applications and origination between 2021 and 2023 by race and ethnicity in Plano, as most homebuyers rely on home purchase loans to access homeownership. Home purchase loan applications increased for all non-White minority racial/ethnic groups between 2021 and 2023, which is a positive trend.

However, successfully approved home purchase loan applications declined for applicants identifying as Some Other Race and Hispanic during the same period, though these two groups have shown more borrowing interest and activities to access homeownership. In addition, home purchase loan borrowing activities for the Some Other Race and the Hispanic populations have not been improving as fast as other racial and ethnic groups between 2021 and 2023.

This suggests that while access to home purchase loans and homeownership have been improving for other non-White minority populations in recent years, populations identifying as Some Other Race and Hispanic have been falling behind. This suggests racial and ethnic disparities in home purchase loans and homeownership access in Plano and a need for additional support for the Some Other Race and Hispanic populations (Figure 6-3).

Figure 6-3

Home Purchase Loan Application and Origination Percent Change by Race and Ethnicity, 2021 - 2023

Plano City, Texas

| | Applications | Originations |
|--|--------------|--------------|
| White | -6.4% | -15.0% |
| Black/African American | 32.2% | 17.7% |
| American Indian/Alaska Native | 37.5% | 50.0% |
| Asian | 28.4% | 17.7% |
| Native Hawaiian/Other Pacific Islander | 400.0% | 200.0% |
| Some Other Race | 4.0% | -7.9% |
| Two or More Races | 100.0% | 200.0% |
| Hispanic or Latino | 11.4% | -7.1% |
| Race Not Available | 14.1% | 5.5% |

Source: HMDA Data and RKG Associates Inc., 2025

B. GEOGRAPHIC DISTRIBUTION OF MORTGAGE APPLICATION APPROVAL

The cumulative mortgage approval rates between 2021 and 2023 vary across the census tracts in the city. Census Tracts 316.72 (16.7%) and 320.16 (38.1%) have the lowest mortgage application approval rates (Figure 6-4).

However, the mortgage approval rate depends on both the number of applications and the number of approved cases in a certain neighborhood, which are associated with numerous other factors, including

Figure 6-5

Denial By Reason by Race and Ethnicity, 2021 - 2023

Plano City, Texas

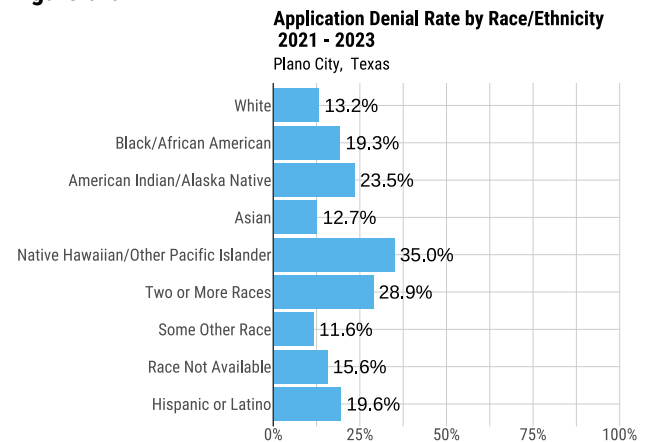
| | All Races/Ethnicity | White | Black/African American | American Indian/Alaska Native | Asian | Native Hawaiian/Other Pacific Islander | Two or More Races | Some Other Race | Hispanic or Latino | Race Not Available |
|--|---------------------|---------------|------------------------|-------------------------------|---------------|--|-------------------|-----------------|--------------------|--------------------|
| Count | | | | | | | | | | |
| Total | 5,336 | 2,361 | 341 | 38 | 1,352 | 13 | 26 | 105 | 522 | 1,100 |
| Debt-to-income ratio | 1,746 | 727 | 94 | 12 | 529 | 9 | 10 | 33 | 176 | 332 |
| Employment history | 63 | 20 | 3 | 1 | 15 | 1 | 0 | 0 | 7 | 23 |
| Credit history | 926 | 444 | 103 | 8 | 166 | 3 | 4 | 24 | 111 | 174 |
| Collateral | 658 | 300 | 43 | 7 | 154 | 0 | 4 | 11 | 55 | 139 |
| Insufficient cash (downpayment, closing costs) | 94 | 38 | 10 | 0 | 20 | 0 | 0 | 1 | 10 | 25 |
| Unverifiable information | 242 | 105 | 7 | 2 | 72 | 0 | 0 | 1 | 17 | 55 |
| Credit application incomplete | 894 | 378 | 45 | 6 | 214 | 0 | 6 | 16 | 86 | 229 |
| Mortgage insurance denied | 4 | 2 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 1 |
| Other | 709 | 347 | 36 | 2 | 181 | 0 | 2 | 19 | 60 | 122 |
| Percent | | | | | | | | | | |
| Total | 100.0% | 100.0% | 100.0% | 100.0% | 100.0% | 100.0% | 100.0% | 100.0% | 100.0% | 100.0% |
| Debt-to-income ratio | 32.7% | 30.8% | 27.6% | 31.6% | 39.1% | 69.2% | 38.5% | 31.4% | 33.7% | 30.2% |
| Employment history | 1.2% | 0.8% | 0.9% | 2.6% | 1.1% | 7.7% | 0.0% | 0.0% | 1.3% | 2.1% |
| Credit history | 17.4% | 18.8% | 30.2% | 21.1% | 12.3% | 23.1% | 15.4% | 22.9% | 21.3% | 15.8% |
| Collateral | 12.3% | 12.7% | 12.6% | 18.4% | 11.4% | 0.0% | 15.4% | 10.5% | 10.5% | 12.6% |
| Insufficient cash (downpayment, closing costs) | 1.8% | 1.6% | 2.9% | 0.0% | 1.5% | 0.0% | 0.0% | 1.0% | 1.9% | 2.3% |
| Unverifiable information | 4.5% | 4.4% | 2.1% | 5.3% | 5.3% | 0.0% | 0.0% | 1.0% | 3.3% | 5.0% |
| Credit application incomplete | 16.8% | 16.0% | 13.2% | 15.8% | 15.8% | 0.0% | 23.1% | 15.2% | 16.5% | 20.8% |
| Mortgage insurance denied | 0.1% | 0.1% | 0.0% | 0.0% | 0.1% | 0.0% | 0.0% | 0.0% | 0.0% | 0.1% |
| Other | 13.3% | 14.7% | 10.6% | 5.3% | 13.4% | 0.0% | 7.7% | 18.1% | 11.5% | 11.1% |

Source: HMDA Data and RKG Associates Inc., 2025

While the cumulative mortgage application denial rate is 13.9% for all applicants, including those with no race data, denial rates vary across the racial and ethnic groups of applicants. Applicants of Asian, White, and Some Other Race tend to access mortgages more successfully than average between 2021 and 2023.

In comparison, all other non-White minority/ethnic applicants face more challenges in obtaining mortgages in Plano. Native Hawaiian/Other Pacific Islander applicants were most likely to be denied with a denial rate of 35.0%, followed by applicants with Two or More Races (28.9%), American Indian/Alaska Native (23.5%), Hispanic or Latino (19.6%) and Black applicants (19.3%) (Figure 6-6).

Figure 6-6



Source: HMDA Data and RKG Associates, Inc., 2025

This suggests that impediments to successful mortgage access and, therefore, impediments to fair housing choices exist for the non-White minority populations in Plano. The City should collaborate with financial lending institutions and housing organizations that provide financial literacy education and mortgage application assistance to target credit history and credit application completion issues among minority applicants.

D. MORTGAGE DEMAND AND ACCESS INDEX ANALYSIS

RKG Associates prepared a special analysis of housing demand and access that examined how each racial or ethnic group performed on mortgage loan applications within each census tract in Plano between 2021 and 2023. The purpose of the analysis was to identify patterns of performance differences within each racial or ethnic group as compared to how the group performed on average across all census tracts in the city over the two years. "Mortgage Demand and Access Index" is a statistical measure created by RKG Associates to measure and compare the relative success rate of mortgage loan applications for each racial and ethnic group based on: (1) the group's ability to pay or purchase a home, (2) the proportion of the applicants by racial and ethnic group to the total population of loan applicants, (3) the loan denial rate by racial and ethnic group, and (4) the propensity of each racial and ethnic group to buy or rent within the census tracts in the city based on known housing tenure rates.

1. Home Purchase Loan Application Activity

Among the 13,278 home purchase loan applications with documented race and ethnic information of applicants (excluding records with no racial/ethnic data) in Plano, half (49.1%) of them were submitted by White applicants, followed by Asian applications, with a share of 41.6%. Roughly 7.0% of home purchase loan applications were submitted by Hispanic applicants. Applicants in other racial and ethnic groups constitute between 0.1% and 4.8% of all home purchase loan applicants between 2021 and 2023 (Figure 6-7). Compared to the city's 2023 racial and ethnic composition (Figure 6-2), that data shows

that residents identifying as Black, Two or More Races, Some Other Race, and Hispanic were underrepresented in home purchase loan applications and homeownership access between 2021 and 2023 in Plano.

Figure 6-7

Home Purchase Loan Application by Race/Ethnicity, 2021 - 2023

Plano City, Texas

| Applicant Race/Ethnicity | | Number | Percent |
|--------------------------|--|---------------|---------------|
| Race | | | |
| | White | 6,518 | 49.1% |
| | Black/African American | 634 | 4.8% |
| | American Indian/Alaska Native | 53 | 0.4% |
| | Asian | 5,528 | 41.6% |
| | Native Hawaiian/Other Pacific Islander | 15 | 0.1% |
| | Two or More Races | 30 | 0.2% |
| | Some Other Race | 500 | 3.8% |
| sum | — | 13,278 | 100.0% |
| Ethnicity | | | |
| | Hispanic or Latino | 928 | 7.0% |

Source: HMDA Data and RKG Associates Inc., 2025

2. Ability-to-Pay Index

The first factor of the Housing Demand and Access Index is the “Ability-to-Pay” Index by race and ethnicity, which is the proportion of a racial/ethnic group’s median household income at the city level compared to Plano’s citywide median of \$108,649. The city-level median household income and all median household income by race/ethnicity figures were obtained from the U.S. Census Bureau American Community Survey (ACS) 2023 estimates.

An applicant’s ability to successfully obtain mortgage financing depends on several factors but is mostly dependent on the applicant’s ability to pay for mortgage expenses (i.e., principal, interest, taxes, and insurance). Households with higher incomes will often have more options and access to greater housing choices and mortgage loans.

The Ability-to-Pay Indices that are above 1.0 represent higher household incomes than the city median, and those below 1.0 represent income levels lower than the city median. Only the White population, American Indian/Alaska Native, and Asian population had index values equal to or higher than 1.0. There was no median household income data for the Native Hawaiian/Other Pacific Islander population in Plano in 2023, according to ACS (Figure 6-8).

Figure 6-8

Ability-to-Pay Index by Race/Ethnicity, 2023

Plano City, Texas

| | Median Household Income | Income to Value | Ability to Pay Index |
|--|-------------------------|-----------------|----------------------|
| All Races/Ethnicity | \$108,649 | 4.1 | 1.0 |
| White | \$108,479 | 4.1 | 1.0 |
| Black/African American | \$80,797 | 5.5 | 0.7 |
| American Indian/Alaska Native | \$172,500 | 2.6 | 1.4 |
| Asian | \$137,577 | 3.2 | 1.2 |
| Native Hawaiian/Other Pacific Islander | NA | NA | NA |
| Some Other Race | \$71,583 | 6.2 | 0.5 |
| Two or More Races | \$96,709 | 4.6 | 0.9 |
| Hispanic or Latino | \$81,499 | 5.4 | 0.7 |

Source: HMDA Data and RKG Associates Inc., 2025

3. Mortgage Demand Index

The “Mortgage Demand Index” is the proportion of the number of home purchase loan applications submitted between 2021 and 2023 by each racial and ethnic group as a percentage of each group’s share of the current household population. For example, if the percentage of the Hispanic or Latino household population in Census Tract 1 is 7.2%, and the number of home mortgage applications from this group accounted for 10.0% of the total submitted in this census tract, then the Mortgage Demand Index is 1.4 ($10.0\% \div 7.2\% = 1.4$) in this census tract for the Hispanic or Latino population. This index value accounts for the fact that many people tend to gravitate to various neighborhoods that they prefer or where other people in their social network, racial, and ethnic groups already live. In some respects, people naturally self-select their neighborhoods based on these and many other factors – real and perceived.

4. Mortgage Success Index

The “Mortgage Success Index” measures the relative net success rate of home purchase loan mortgage originations to mortgage denials by race/ethnicity. For example, if Census Tract 2 has 58 mortgage loan applications either approved or denied and a total of 8 denials, then this results in a net of 50 mortgage loans approved and originated, at a net success rate of 86%. For American Indian/Alaska Native applicants, if there are four mortgage applications either approved or denied and there is no denial, then their net success rate would be 100% in this census tract. Therefore, their Mortgage Success index would be 1.16 ($100\% \div 86\% = 1.16$).

5. Results of Mortgage Demand and Access Index

Once the three key indices were calculated for each racial and ethnic group in Plano, an overall “Mortgage Demand and Access Index” was calculated. This analysis does not account for access

issues related to rental housing and is not considered a definitive indicator of different populations' ability to access mortgage loans.

To obtain a final score for each group, RKG weighted each index score to reflect its relative importance to each group's ability to obtain mortgage financing for home purchases. The Ability-to-Pay Index received the highest weighting factor at 50% of the final score since it is the strongest determinant of success in pursuing a mortgage loan. Income is also correlated with a household's credit score, which is another important factor leading to a favorable credit decision.

The Net Mortgage Success Index was assigned a weighting factor of 35%, and the Mortgage Demand Index was assigned a weighting factor of 15% so that variations between the demand and success among the various racial and ethnic groups could be identified. Net mortgage success is a function of a lot of factors but is mostly related to a group's ability to successfully obtain a mortgage loan to purchase a home. While some of those factors are related to a group's ability to pay, credit scores, and similar factors, excessive loan denial rates could denote something else. Conversely, a group's success rate at obtaining mortgage financing can only be largely judged by the demand exhibited by each group to live in these neighborhoods. However, if Hispanic households pursue mortgage loans in certain neighborhoods but are denied at rates exceeding their citywide denial rates, this may indicate that barriers exist.

The values shown in Figure 6-9 reflect the average index value citywide by racial/ethnic group. Note that the Native Hawaiian/Other Pacific Islander population has zero-value index scores because there is no citywide median household income data for this racial group, according to the American Community Survey 2023 5-year estimates.

Only the White, Asian, and Some Other Race populations have Demand and Access Index scores at or above 1.0. The remaining non-White minority racial and ethnic groups all have Demand and Access Index scores below the citywide average. In particular, the population of Two or More Races has the lowest Demand and Access Index score at 0.5, followed by the Black/African American population with a 0.7 index score. This indicates that these minority racial groups have less success in obtaining mortgage financing for home purchases in Plano, according to the Demand and Access Index. However, again, this index does not measure all the numerous factors that influence a racial/ethnic group's success in securing a home mortgage loan.

Figure 6-9

Housing Demand and Access Index, City-Wide Average

Plano City, Texas

| Racial/Ethnic Groups | Average |
|--|------------|
| Total Racial/Ethnic Groups | 1.0 |
| White | 1.0 |
| Black/African American | 0.7 |
| American Indian/Alaska Native | 0.9 |
| Asian | 1.2 |
| Native Hawaiian/Other Pacific Islander | 0.0 |
| Two or More Races | 0.5 |
| Some Other Race | 1.0 |
| Hispanic or Latino | 0.8 |

Source: HMDA Data and RKG Associates Inc., 2025

E. HIGH-COST LENDING

A subprime mortgage is a type of home loan issued to borrowers with low credit scores (often below 600) who are unqualified for conventional mortgages. Subprime mortgages usually come with much

higher interest rates and down payments than conventional options because the borrowers often are at higher default risks. However, more expensive subprime loans are sometimes issued to some borrowers with high enough household incomes, credit scores, and available down payments to qualify for conventional loans. Historically, this is especially true for minority groups, which usually see higher percentages of subprime borrowers. The decision and practice of subprime lending targeting borrowers' racial or ethnic status constitute mortgage discrimination.

Since 2005, the Housing Mortgage Disclosure Act data has included a new category of information called "rate spread." It represents the difference between the loan interest rate and the prevailing U.S. Treasury standard. Though HMDA does not require lenders to report credit score data of applicants, which can be used to determine which loans are subprime, the "rate spread" data can help identify "high-cost" loans, a strong predictor of subprime lending and possible mortgage discrimination.

A loan is considered a high-cost loan if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate of at least five percentage points higher than the standard.

The prevalence of high-cost lending varies across borrowers' racial or ethnic groups between 2021 and 2023 in Plano. The average high-cost lending rate for all racial/ethnic groups is 0.5%, calculated by comparing the number of high-cost lending cases to the total amount of originated and approved and not accepted applications. This is a generally low percentage. However, Hispanic borrowers were more likely to experience high-cost lending during the three years compared to other groups, with the highest high-cost lending rate of 1.8%, followed by the Black population (1.0%) (Figure 6-10).

The cumulative high-cost lending rates between 2021 and 2023 were then mapped by census tract. Given that the citywide average is 0.5%, the darker shades indicate census tracts that are more likely than others to experience high-cost lending practices. High-cost lending has occurred most often on the southeast side in Census Tracts 320.14 (2.8%) and 316.66 (2.4%), as well as in Tract 313.33 (2.3%) on the north side. Note that there is also a cluster of census tracts with a higher prevalence of high-cost lending on the southeast side of the city, overlapping with Hispanic-concentrated neighborhoods in Plano. These tracts, along with Census Tract 316.66, also demonstrated lower median household incomes, more exposure to poverty, and a higher prevalence of housing issues, as discussed in Chapter 3 (Figure 6-11).

The data suggests some correlation between high-cost lending and certain minority groups and neighborhoods, especially the Black and Hispanic populations on the southeast side of the city. However, more evidence and data are needed to determine whether the higher occurrence of subprime loans among these populations is intentional targeting. Nonetheless, it is evident that the Black and Hispanic populations, especially those from the southeast side of the city and Census Tract 316.66, face more impediments to mortgage access and housing choices in Plano. The City should take proactive measures to engage with financial lending institutes and service providers assisting these groups to improve applicants' qualifications and prevent race- and ethnicity-targeted high-cost lending practices.

Figure 6-10

Cumulative High Cost Lendings by Race/Ethnicity, 2021 - 2023

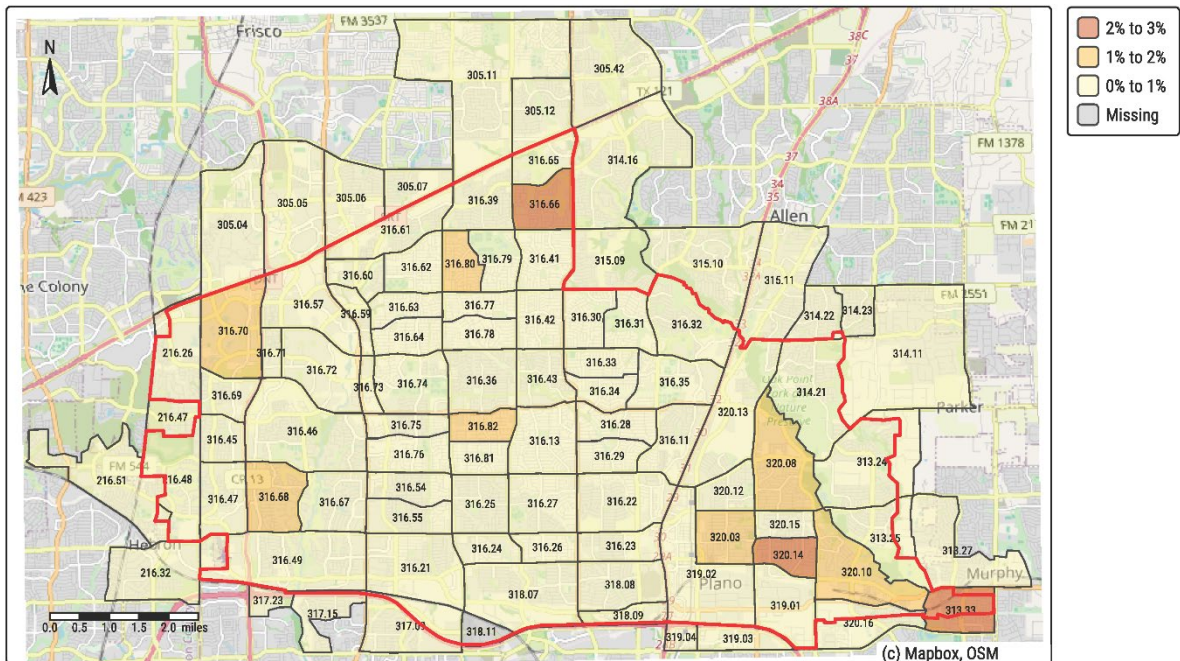
Plano City, Texas

| | Total Originated/Approved Not Accepted Applications | No. of High Cost Lendings | High Cost Lending Rate |
|--|---|---------------------------|------------------------|
| Race | | | |
| White | 11,676 | 53 | 0.5% |
| Black/African American | 967 | 10 | 1.0% |
| American Indian/Alaska Native | 98 | 0 | 0.0% |
| Asian | 6,649 | 15 | 0.2% |
| Native Hawaiian/Other Pacific Islander | 21 | 0 | 0.0% |
| Two or More Races | 36 | 0 | 0.0% |
| Some Other Race | 614 | 0 | 0.0% |
| Race Not Available | 3,962 | 15 | 0.4% |
| sum | 24,023 | 93 | — |
| Total | — | — | 0.5% |
| Ethnicity | | | |
| Hispanic or Latino | 1,578 | 28 | 1.8% |

Source: HMDA Data and RKG Associates Inc., 2025

Figure 6-11

**Cumulative High Cost Lending Rate, 2021 - 2023
Plano City, Texas Census Tracts**



F. REAL ESTATE ADVERTISING AND AFFIRMATIVE MARKETING

RKG Associates also examined Realtor websites to assess if real estate brokers and sales offices are providing information supporting people's rights to fair housing choices in their advertising and marketing practices. This assessment also examined whether potentially discriminatory language was used on real estate listing websites in Plano's home sales and rental markets.

In general, no real estate listing website samples examined for this study contain discriminatory language. On the other hand, the provision of information related to the Fair Housing Act and fair housing choices is inconsistent across different websites. In general, major real estate listing services such as Century 21, Zillow/Trulia, Apartments.com, and Coldwell Banker have specific statements expressing the key principles of the Fair Housing Act and the Equal Opportunity Act.

For example, Century 21 prohibits "discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions." Also, each Century 21 Real Estate LLC franchised office is contractually required to comply, in all respects, with all laws, rules, and regulations applicable to the real estate industry, including, without limitation, the requirements imposed by the Fair Housing Act. Apartments.com prohibits advertising "any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin, or intention to make such preference, limitation or discrimination." Zillow/Trulia has provided a detailed article explaining the basics of the Fair Housing Law (<https://www.zillow.com/rental-manager/resources/fair-housing-guide/>). Coldwell Banker has a dedicated Fair Housing page that lists the laws that protect fair housing rights, the responsibilities of home sellers and real estate professionals, and resources to seek help when the violation of rights occurs.

However, based on RKG's sampling, most of Plano's local real estate agency websites do not have specific languages, statements, or resources related to fair housing. Six local Realtors (HAR.com, Berkshire Hathaway Homeservices, TexasRealEstateSource.com, Knox Realtors, Brownstead Real Estate, and AtProperties.com) have listed the logo of Equal Housing Opportunity at the bottom of their websites but have not provided further details. Two (Houzeo, and DFW Urban Realty) do not have any logo or language related to fair housing. Only three (Ebby Halliday, Allen Properties, and Fathom Realty) have listed both the Equal Housing Opportunity logo and a link to their fair housing statements, and two (Ebby Halliday and Allen Properties) of them also provide a link to HUD's fair housing page.

G. HOUSING MARKET OVERVIEW

Residential sales activities, home value, and rent levels are vital indicators of the overall well-being of a community's housing market, displaying the relations between housing demand and supply. The RKG team obtained the residential sales data from Redfin.com, in addition to the median home value and the median monthly gross rent data from the American Community Survey 2023 5-Year Estimates to provide an overview of Plano's housing market.

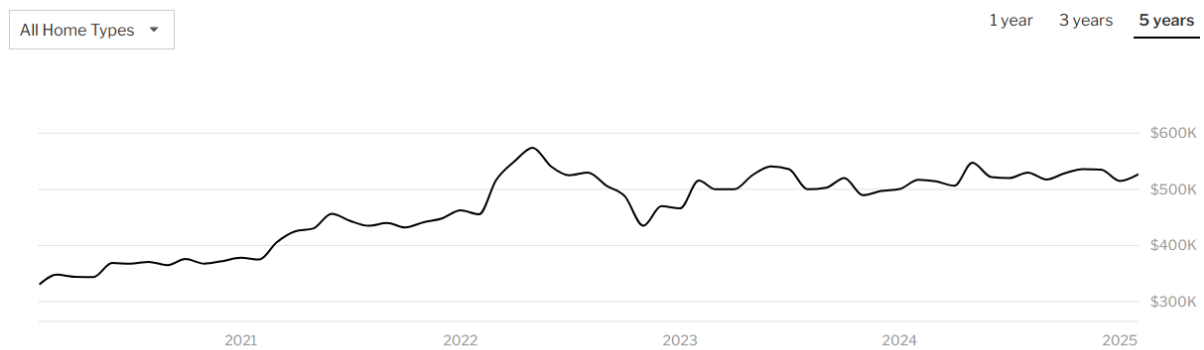
1. Home Value and Sales Trend

According to the data from Redfin.com, Plano's housing market is somewhat competitive, with a Redfin Compete Score of 60 out of 100. This means that "Some homes get multiple offers, but typically take weeks to sell". The average homes sell for around 2% below the listing price and go pending in around

43 days. Popular homes can sell for around the listing price and go pending in around 18 days. According to Redfin, “Compete Score rates how difficult it is to win a home in an area. Using a combination of proprietary Redfin data and data from local multiple listing services (MLS), Compete Score is primarily calculated based on four inputs: number of competing offers, waived contingencies, sale-to-list ratio, and number of days on market.”

In addition, Plano’s median home sale price in February 2025 was \$527,000, which was a 1.9% growth compared to a year ago. Compared to the median sale price of \$330,500 in February 2020, the city’s median home sale price was up by 59.5% over five years, which is an 11.9% annual growth. On average, homes in Plano sell after 42 days on the market. In addition, 190 homes were sold in February 2025, increasing from 164 a year ago, a 15.9% year-over-year growth. This means that within the city, home purchase interest has pushed up the sale prices of homes, most likely fueled by increasing demand (Figure 6-12).

Figure 6-12: Plano Median Sale Price, Feb. 2020 to Feb. 2025



Based on Redfin calculations of home data from MLS and/or public records.

According to the 2023 American Community Survey (ACS) 5-Year Estimates, the median home value in Plano jumped by 102.3% between 2013 and 2023, an annual growth of 10.2% (Figure 6-13). This corresponds with the upward trend of the median sale prices of homes, as discussed. It also shows that the median home value in Plano has accelerated faster than the growth of median household income between 2013 and 2023. Plano’s 2023 draft Strategic Housing Study also pointed out that a wide gap has emerged between existing and new single-family housing stock, with single-family homes becoming nearly out of reach for the average Plano household. The median sales price of all single-family units increased 77% between 2010 and 2023. The median sales price of new units (those built and sold in the same year) over the last decade is 33% greater than existing units.

Figure 6-13

| Housing & Income Trends, 2013 - 2023 | | | | | | | | | | | | Change 2013 - 2023 | |
|--------------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|--------|-----------|-----------|--------------------|--------|
| Plano City, Texas | | | | | | | | | | | | | |
| | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | Actual Chg. | % Chg. |
| Median Gross Rent | \$1,087 | \$1,115 | \$1,148 | \$1,196 | \$1,243 | \$1,330 | \$1,418 | \$1,447 | 1541 | \$1,699 | \$1,792 | \$705 | 64.9% |
| Median Home Value | \$217,800 | \$222,800 | \$231,600 | \$248,800 | \$271,300 | \$291,300 | \$320,100 | \$341,800 | 358100 | \$412,500 | \$440,600 | \$222,800 | 102.3% |
| Median Household Income | \$82,484 | \$82,944 | \$83,793 | \$85,085 | \$88,578 | \$92,121 | \$95,602 | \$96,348 | 99729 | \$105,679 | \$108,649 | \$26,165 | 31.7% |

Source: ACS 5-Year Estimates, RKG Associates Inc., 2025

The data suggests that people’s ability to pay is falling behind the price hikes in homes in the city, resulting in less buying power for homeownership. Therefore, the increasing home prices are and will continue to be a challenge for the lower-income and most vulnerable residents if their incomes and ability to pay for housing are not improved.

Figures 6-14 and 6-15 display the 2023 median home values and the annual percentage changes of median home value between 2018 and 2023 by census tract in Plano. The data was also obtained from the 2023 American Community Survey 5-Year Estimates.

The median values of homes are generally lower in neighborhoods on the east side of the city, where there are higher levels of poverty, lower homeownership rates, and less access to opportunities. In comparison, the highest home values are seen on the west side of the city, especially along the Dallas North Tollway, where business parks and major employers cluster. However, the southeast side of Plano, such as Census Tracts 319.01 and 319.02, has seen rapid home value growth between 2018 and 2023. This is fueled by the rapid population and income growth in the traditional downtown area associated with the recent redevelopment and influx of younger residents.

This data further demonstrates and aligns with the findings from the demographic section in that the most vulnerable existing residents in southeast Plano, which is traditionally more affordable, face increasing risks of displacement and barriers to housing options due to growing redevelopment interest and housing demand in this neighborhood. It suggests that the City should take proactive measures to stabilize and preserve existing affordability in southeast Plano, especially around the traditional downtown area, in addition to preventing displacement and housing instability for existing residents in these areas.

Figure 6-14
Median Home Value, 2023 ACS
Plano City, Texas Census Tracts

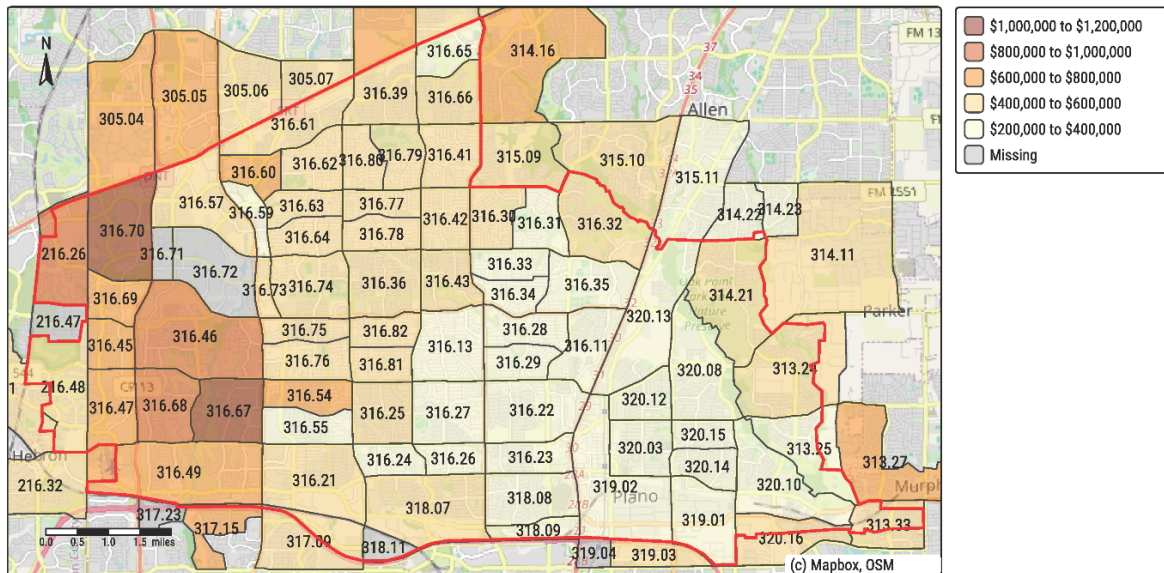
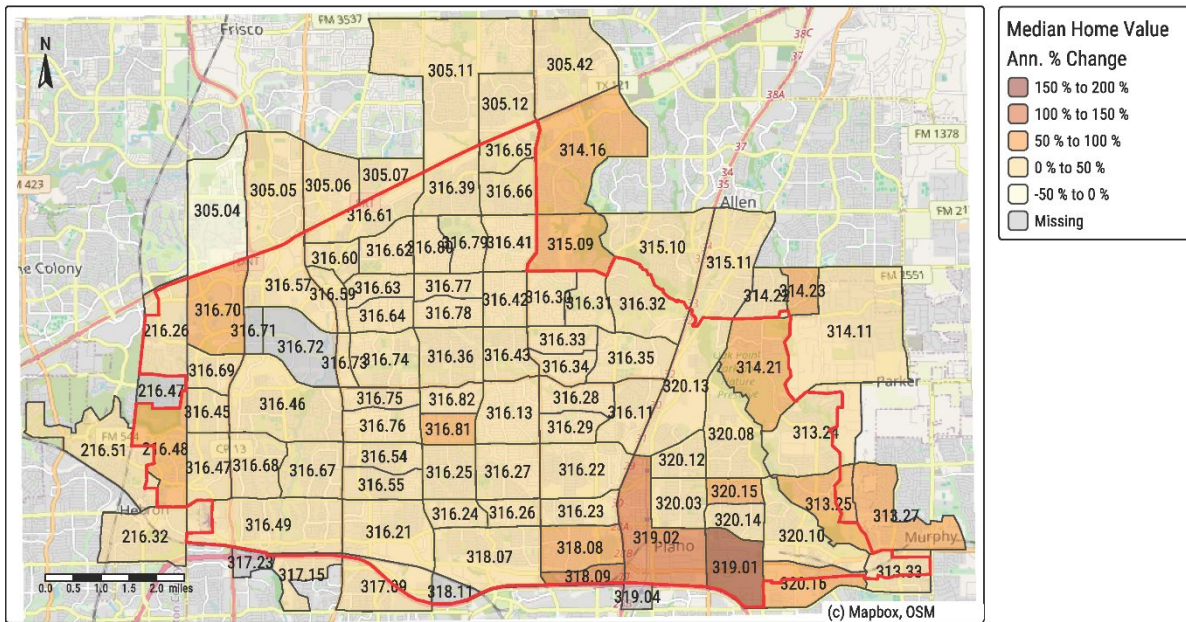


Figure 6-15
 Median Home Value Annual Percent Change, 2018 - 2023 ACS
 Plano City, Texas Census Tracts



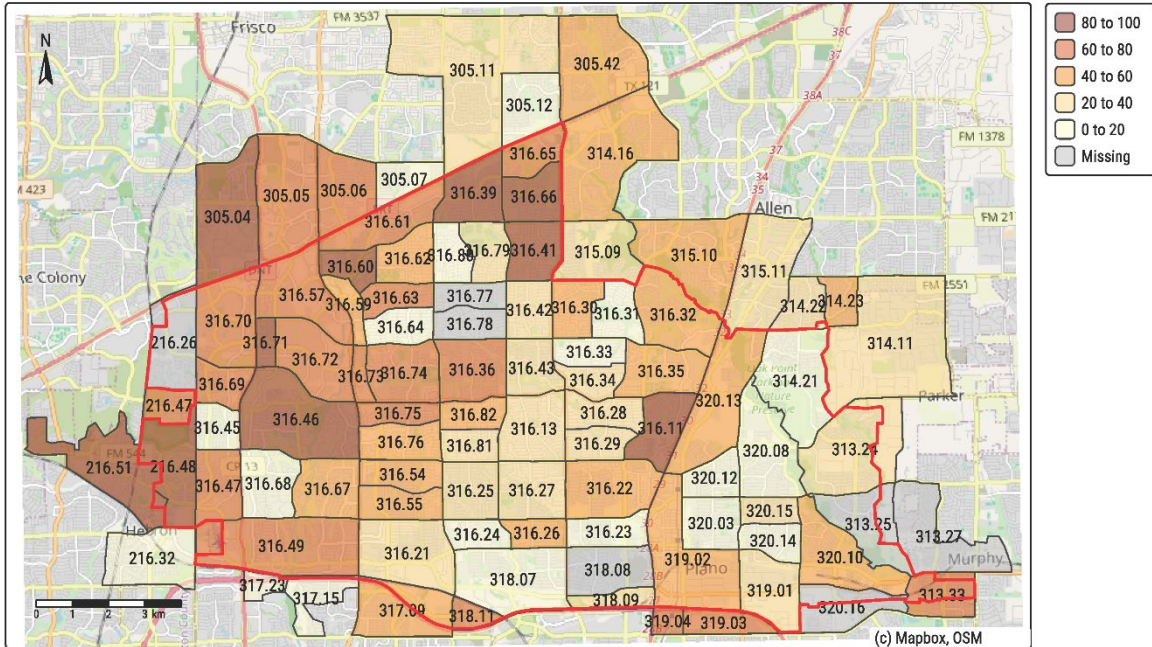
2. Rental Rate Overview

Figure 6-13 shows that the citywide median gross rent in Plano between 2013 and 2023 rose by 64.9%. This is faster than the growth of the median household income in the city during the same decade, which increased by 31.7% during those years. This means that diminishing rental housing affordability is an issue that creates barriers to housing access in Plano, as residents' ability to pay for housing costs is falling behind the rising rent levels in the city.

RKG also adopted a ranking method to show which neighborhoods in and around the city have higher rent rates, considering all bedroom types. All census tracts with available median gross rent data were ranked and received scores based on their median gross rents from low to high under each bedroom type. If the median gross rent for a certain bedroom type is not available in a census tract, then it receives a score of zero. The total score of all bedroom types was then summed for each census tract, which was ranked again based on its total score.

The results were mapped by census tract, with darker shades indicating higher total scores and, therefore, higher median gross rent levels considering all bedroom types. Census tracts on the west and north sides of Plano generally have higher rent rates, though Census Tract 316.11 on the east side also has high rent levels. This means that renters in lower-income neighborhoods do not necessarily have access to the lowest market-rate rents. If these renters do not have access to publicly subsidized units, they are faced with very limited affordable market-rate rental options. This resonates with findings from Chapter 3 in that Plano has limited rental options that are affordable throughout the city, which creates a barrier for renters to access fair housing choices, especially the most vulnerable renters with lower income levels (Figure 6-16).

Figure 6-16
Median Gross Rent Ranking for All Bedroom Types, 2023 ACS
Plano City, Texas Census Tracts



7 IMPEDIMENTS TO FAIR HOUSING CHOICE

This section summarizes the impediments to fair housing choice within the City of Plano, Texas, presented in this analysis, and proposes recommendations to the city to address such impediments.

A. STAKEHOLDER INTERVIEWS

The consultant spoke with several housing- and service-related stakeholders in the City of Plano service area during April 2025. These interviews are intended to understand the current capacity of these organizations versus the existing housing demand and identify impediments to fair housing. All the interviewed organizations serve areas that include the City of Plano. The interviewed organizations and individuals include:

- North Texas Association of Realtist,
- National Association of Hispanic Real Estate Professionals, and
- Plano Housing Authority.

Note that the consultant also reached out to five other organizations and individuals three times during April 2025 for stakeholder interviews. However, the consultant has not heard back from these stakeholders as of the time this report was written in May 2025.

Also, note that the section below is purely a summary and documentation of the interviewees' opinions and perspectives. They are not statements or opinions of RKG, nor necessarily facts. However, even if there are limitations in these interviewees' perspectives, they reflect how some housing service organizations and stakeholders perceive the existing housing issues in the city, pointing to areas that Plano should focus on while planning future housing strategies.

Barriers to Housing

1. Limited Affordable Homeownership Opportunities and Entry-Level Homes, Especially for the Hispanic Population

- The interviews reveal significant challenges regarding housing impediments in the City of Plano. One interviewee emphasized the need for sustainable and affordable homeownership for the Hispanic community. They highlighted the lack of affordable entry-level homes.
- Interviewees suggested that the City should focus on increasing the availability of duplexes and triplexes instead of single-family homes to help increase the supply of attainable entry-level homes.
- Interviewees also pointed out the importance of better advertising city housing programs. This would help residents access information and programs that they would otherwise not know about.

2. Existing Zoning Limits the Development of Attainable Housing Options

- Another barrier identified by the interviews was Plano’s current zoning policies, such as dimensional standards and parking requirements, which limit the feasibility of infill development and were seen as significant obstacles to building more attainable housing options. For example, existing minimum lot sizes and setback requirements make building smaller homes, which are usually more affordable due to smaller sizes, financially infeasible for developers. This is because, to efficiently use the buildable area on a piece of land based on the existing minimum lot sizes and setback requirements, developers are essentially encouraged to build larger, more expensive housing to achieve financial feasibility.

3. Insufficient Homeownership Assistance

- Interviewees mentioned that the current downpayment assistance programs in Plano are insufficient due to high home prices, coupled with borrowers usually facing financial barriers such as student loans, insufficient income, and other credit issues, all of which are obstacles to homeownership.
- The interviewees emphasized the role of education in encouraging homeownership and advocated for creating a homeownership system to replace perpetual renting via the Housing Choice Voucher program.

Stakeholder Recommendations

The interviewees provided recommendations that emphasized the need for policy changes at the city level and enhanced community engagement.

1. Citywide Policy Change to Encourage Housing Type Diversity

- One key suggestion is to increase the number of housing typologies allowed in existing neighborhoods (e.g., duplexes and triplexes) rather than continuing to build single-family homes, which are not an efficient use of land according to interviewees.

2. Increase Community Outreach to Better Advertise Available Programs and Resources

- Another recommendation was to expand and better advertise housing programs to help residents access information and obtain grants towards buying their first home or rehabilitating a home they recently purchased.

3. Increase City Financial Incentives and Establish Partnerships to Encourage Attainable Housing Development

- Additional recommendations included incentivizing development through tax breaks for developers building housing options that are affordable, and leveraging the large land ownership of churches and other institutions to establish community land trusts on which attainable housing options can be built.

B. PREVIOUS GOALS AND PROGRESS MADE

Plano's 2020 Impediments to Fair Housing Analysis (AI) identified several goals:

- Increase the supply of affordable housing units,
- Increase the supply of accessible, affordable housing for persons with disabilities,
- Increase access to affordable transportation for low-income households and persons with disabilities,
- Make investments in targeted neighborhoods to increase opportunity,
- Increase access to information and resources on fair and affordable housing, and
- Maintain and improve the quality and management of publicly supported housing.

According to City staff, some progress has been made since the City's 2020 AI. However, it is also important to note that some of the goals identified in the City's 2020 AI have not been addressed especially given recent developments, such as increasing the supply of affordable housing units, maintaining and improving the quality and management of publicly supported housing, and increasing access to affordable transportation for low-income households and persons with disabilities. Recommendations will be further discussed below in the Impediments and Recommendations section. Progress made and status of the goals previously identified by the City's 2020 AI are discussed below.

Access to Affordable Transportation

- Plano has been working with DART to increase GoLink access.
- The Transportation Management Associations is still ongoing and will continue.
- DART provides paratransit service, but the issue has been that paratransit vehicles often arrive late.
- Plano conducted an assessment of senior housing and met with DART, which added routes based on the assessment.
- For the past decade, there have not been any non-governmental organizations that have come forward to partner with the City on a transportation assistance program, while the City does not have the capacity to pursue such a program on its own.
- In addition, in Plano's new Comprehensive Plan (starting October 2025), there will not be a goal for transportation. Instead, the City's new Comprehensive Plan will focus more on educating residents on using existing resources while acknowledging the existence of issues related to affordable transportation access.

Investments in Targeted Neighborhoods

- Plano had a small business program during the COVID-19 pandemic, but it is no longer available. When a need for small business assistance arises, the City usually refers businesses to the Small Business Association or the library for resources.
- Regarding business improvement, small business development, and investment in targeted neighborhoods, the City offers revitalization grants to property owners in need of property improvement at the Four Corners retail area. According to City staff, Plano's retail spaces in general are 96% leased and are not necessarily "distressed." However, it is not a coincidence that the two projects that have and/or are currently utilizing the revitalization grants are in the city's older retail areas located on the east side of Plano, near neighborhoods with higher percentages of low- and moderate-income households.
- According to the City staff, the City's Neighborhood Service Division has never been involved in crime prevention, which will have to be provided by the Police Department.

- The City's Neighborhood Service Division has completed a neighborhood revitalization program and is planning to utilize HUD funding for this purpose in the next five years. As part of this process, the Neighborhood Service Division refined its definition of neighborhood associations by including entities such as crime watch groups and volunteer groups.

The Supply of Accessible, Affordable Housing for Persons with Disabilities

- The City conducted an accessibility overhaul in the past two years, targeting infrastructure (e.g., improving access to buildings and sidewalks, the City's websites, etc.).
- Accessibility modification for low-income homeowners has been categorized as necessary/emergency repair by the City under the City's rehabilitation program for single-family homes.
- The City does assist rental properties under the City's rehabilitation program, though not frequently.
- The City used CDBG funds to redevelop an administration office (a one-time program) into rental housing that complies with the Americans with Disability Act (ADA) accessibility standards.
- The City communicates with private developers regarding compliance with ADA accessibility standards.
- Back in 2019, the City partnered with the Plano Housing Authority on an accessibility modification program that did not rely on HUD funding (a one-time program).

Access to Information and Resources on Fair and Affordable Housing

- The City conducted education and information sessions on fair and affordable housing in 2018. A Fair Housing Symposium also occurred in April 2025.
- The City created a guide in 2024 to help lower-income households better understand the housing rehabilitation program.
- According to City staff, Plano has been trying to communicate to the public that there is a housing affordability issue in the city.

Publicly Supported Housing

- Note that, as discussed in Section 5, the City of Plano and Plano Independent School District (PISD) are currently pursuing legal action against the Plano Housing Authority's use of Public Facility Corporations (PFC) to ensure transparency and accountability in affordable housing projects. According to City staff, the City still has a staff relationship with the Plano Housing Authority, but not a concerted effort to collaborate.
- Plano has a Multifamily Rental Program, which conducts annual rental registration and inspection, including voucher-based properties managed by the Plano Housing Authority.

Supply of Affordable Housing Units

- Plano has a hotel/motel inspection program to inspect the physical conditions of hotels and motels used as an affordable housing option.
- Plano has been funding developers to build, acquire, rehabilitate, and resell using HOME funds. According to City staff, most housing developments in Plano have been infill projects, as less than 1% of the city's land zoned residential is vacant, and less than 4% of any land (regardless of zoning) is vacant in general.
- However, as discussed in Section 5, in May 2025, City staff reported that Plano's City Council discontinued funding for the Downpayment Assistance Program (DPA) and for acquisition, rehab, or resale activities in the 2025–2029 Consolidated Plan. However, the City may continue using the remaining \$150,000 in previously approved DPA funds, and current acquisition, rehab, and resale projects may proceed, though no new ones will be initiated. These changes pose a significant barrier

to fair housing in Plano. If the newly elected City Council (as of May 2025) approves a substantial amendment, these activities could be reinstated.

C. IMPEDIMENTS AND RECOMMENDATIONS

1. Cluster of Publicly Supported Housing in Minority- and Hispanic-Concentrated Areas with Lower Incomes and Limited Access to Resources and Opportunities, Coupled with Risk of Gentrification

Though Plano does not have Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs) in 2023 according to HUD's definition, census tracts on the east side of Plano overlapping with Minority- and Hispanic-concentrated areas have the highest poverty rates, especially Census Tracts 317.09, 319.01, 319.02, 316.35, and 316.24. In addition, these areas in east Plano, especially along U.S. Route 75, where the rental market is relatively more attainable, are more challenged with limited access to resources and opportunities according to the findings from Section 3, as they also see a higher prevalence of housing condition issues, lower household incomes, lower levels of labor market engagement and school proficiency, as well as a cluster of the Hispanic population. These areas generally overlap with the designated Low to Moderate Income block groups in Plano. In addition, publicly supported rental housing options are mostly limited to these neighborhoods, coupled with scarce attainable rental options in other parts of the city, creating barriers for residents from lower-income and Minority-/Hispanic-concentrated areas to access fair housing options and resources in other neighborhoods throughout Plano.

Fair Housing Action Items

Short-Term Actions (1 to 2 Years)

- Conduct a spatial audit to identify gaps in community resources in East Plano, such as quality schools, affordable childcare, fresh grocery access, transit, etc.
- Launch a multi-lingual community outreach and engagement initiative to understand residents' needs in East Plano and Southeast Plano.
- Launch a multi-lingual educational campaign to help residents better utilize the existing DART transit services, with a focus on neighborhoods on the eastern and southeastern sides of Plano.
- Develop an anti-displacement and preservation strategy in collaboration with housing-related organizations and service providers in the area, focused on neighborhoods at higher risk of gentrification and involuntary displacement, such as the southeastern side of Plano.

Mid-to-Long-Term Actions (3 to 5 Years)

- Invest in economic development initiatives in East Plano, such as increasing grocery stores, childcare, job centers, job training, entrepreneurship assistance, and recreational facilities.
- Incentivize development of attainable housing in high-opportunity and amenity-rich areas through strategies such as tax abatements or density bonuses.
- Expand workforce and price-targeted housing programs outside minority- and Hispanic-concentrated areas.
- Monitor demographic changes and displacement risk annually to adapt the City's anti-displacement efforts.

2. Limited Attainable Housing Options throughout Plano, Coupled with Restrictive Zoning and Community Resistance

As discussed in Section 3 and Section 5 and emphasized by stakeholder interviews, soaring housing prices, limited affordable rental options, and a lack of entry-level homes for the minority and Hispanic populations to enter homeownership, are coupled with “Not In My Backyard” (NIMBY) attitudes of residents from some higher-income and more established neighborhoods. In addition, Plano’s existing zoning ordinance disincentivizes diverse housing types and densities, essentially creating barriers to building more affordable market-rate housing options, both for-sale homes and rental units. Significant opposition also exists to the creation of multifamily housing, even though there is considerable need. All these constitute a significant impediment to fair housing choices in Plano.

Fair Housing Action Items

Short-Term Actions (1 to 2 Years)

- Launch a citywide multi-lingual public education campaign about the need for and benefits of attainable and mixed-income housing.
- Establish a Housing Advisory Committee with community stakeholders to advise on zoning and housing reform.
- Consider a zoning ordinance audit and update focusing on increasing housing diversity and affordability:
 - Upzoning existing residential districts where appropriate,
 - Expanding mixed-use zoning,
 - Expanding Accessory Dwelling Units (ADUs),
 - Providing incentives for attainable housing units (e.g., tax breaks, grants, or density bonuses),
 - Reducing minimum lot sizes,
 - Allowing flexibility in zoning regulations, such as dimensional standards, especially for income-controlled and price-targeted housing development, and
 - Promoting Transit-Oriented Development (TOD).

Mid-to-Long-Term Actions (3 to 5 Years)

- Implement zoning reforms to allow for higher density and mixed-use development, including Transit-Oriented Development.
- Establish policy and financial incentive programs for developers to include affordable/attainable units in new developments.
- Regularly review and update zoning codes every three to five years to ensure alignment with Plano’s evolving housing needs and fair housing goals.

3. Risk of Reduced Public Transit Options and Decline in Access to Fair Housing Choices for the Lowest-Income Residents

DART offers several discounts to make transportation more affordable for eligible riders. DART provides discounts on fares for veterans, seniors (65+), persons with disabilities, youth (ages 5-14), high school students, and college students, in addition to curb-to-curb transportation for people with disabilities who are unable to use DART’s bus or rail services. A reduction in DART services can significantly impact Plano residents and workers who utilize the services, without feasible, attainable, and convenient long-term

transportation alternatives, especially for the most vulnerable populations with disabilities and low and moderate incomes who depend on the current DART services to access jobs and resources.

Fair Housing Action Items

Short-Term Actions (1 to 2 Years)

- Ensure to include the aspect of public transit in the community outreach and engagement initiative in East Plano and Southeast Plano when surveying community needs and resource gaps.
- Ensure to focus on neighborhoods on the eastern and southeastern sides of Plano during the multi-lingual educational campaign to help residents better utilize the existing DART transit services.

Mid-to-Long-Term Actions (3 to 5 Years)

- Consider alternatives to help serve residents when the transit demand cannot be met by DART's existing services.

4. Limited Dedicated Local Funding and Insufficient/Loss of Funding for Attainable Housing Development and Homeownership Assistance

Though housing rehabilitation activities are emphasized in Plano's CDBG and HOME allocations, which is positive, allocations for constructing and developing attainable housing options and homeownership assistance are limited. Findings from stakeholder interviews further support this point, with interviewees pointing out that the current homeownership assistance program is insufficient for potential homeownership due to high housing costs, and that more incentives are needed to encourage the development of new and diverse housing options that are attainable. The City noted that its current homeownership assistance program is underutilized, which is a concern for the City. However, anecdotal evidence suggests that this is due to the current program not meeting potential applicants' needs, instead of a lack of demand.

As discussed in Section 5, note that as of May 2025, City staff shared that Plano's City Council has decided to discontinue the Downpayment Assistance Program (DPA) and funding for acquisition, rehabilitation, or resale activities. These programs are not included in the approved 2025–2029 Consolidated Plan Priorities and Goals. However, the Council authorized the continued use of the remaining \$150,000 in previously approved DPA funds. Existing acquisition, rehab, and resale projects may proceed, but no new initiatives of this kind will be undertaken. These decisions are expected to create impediments to fair housing choices in Plano. That said, if the newly elected City Council (as of early May 2025) chooses to approve a substantial amendment, these discontinued activities could be reinstated.

Fair Housing Action Items

Short-Term Actions (1 to 2 Years)

- Reinstatement of the Downpayment Assistance Program and funding for acquisition, rehabilitation, and resale activities.
- Update the homebuyer assistance program and improve fund utilization by loosening restrictions and eligibility requirements to reflect Plano's current housing market.
- Conduct stakeholder engagement to explore additional local housing finance tools (e.g., bonds, trust funds).

Mid-to-Long-Term Actions (3 to 5 Years)

- Expand the local funding allocation and capacity for housing development and construction activities. For example:
 - Fostering additional partnerships with for-profit and non-profit mixed-income and attainable housing developers.
 - Establishing a local Housing Trust Fund dedicated to preservation, new development, and homeownership.
 - Issuing bonds to leverage private investment.
- Monitor outcomes of funded projects and adjust investment strategies accordingly.

5. Loss of the Fair Housing Center, Coupled with a Lack of Funding for Fair Housing

Plano was served by the North Texas Fair Housing Center, which provides housing counseling, investigates housing discrimination complaints, offers financial assistance, and conducts outreach and educational programs. However, RKG was informed by the City that the North Texas Fair Housing Center has been closed as of April 25, 2025. The lack of an active fair housing center serving the city in fair housing counseling, investigation, and education constitutes an impediment to fair housing for Plano. In addition, fair housing complaints doubled between 2023 (9 complaints) and 2024 (18 complaints) in Plano, based on data obtained from the U.S. Department of Housing and Urban Development (HUD), further highlighting the need for a new dedicated fair housing center to reduce housing discrimination in the city. Further, Plano currently has no CDBG or HOME allocations for activities or services related to fair housing.

Fair Housing Action Items

Short-Term Actions (1 to 2 Years)

- Expand the City's existing housing counseling services provided by the Housing Counselor, and allocate CDBG or local funds to additional fair housing education and enforcement activities in multiple languages, such as Spanish, with a focus on the renter population.
- Integrate multi-lingual fair housing education into Plano's existing housing and rental assistance programs.
- Establish partnerships with local community organizations and faith-based organizations that local residents trust for fair housing awareness outreach, especially those serving minority- and Hispanic-concentrated neighborhoods.

Mid-to-Long-Term Actions (3 to 5 Years)

- Contract a HUD-certified fair housing organization to provide comprehensive and multi-lingual services, especially for renters, such as complaint investigation, mediation, legal support, and training.
- Utilize dedicated local funding sources for additional fair housing funding, such as the local housing trust fund.
- Track fair housing complaint trends and evaluate the effectiveness of the fair housing services annually.

6. Racial/Ethnic Disparity in Homeownership Access

As discussed in Section 6, racial and ethnic disparity exists for successful mortgage access in Plano, especially for home purchase loans and homeownership opportunities. Residents identifying as Black, Two or More Races, Some Other Race, and Hispanic, especially those from the southeast side of the city, were underrepresented in mortgage applications and homeownership access and faced more high-cost lending between 2021 and 2023 in the city.

Fair Housing Action Items

Short-Term Actions (1 to 2 Years)

- Update the City's Downpayment Assistance Program to prioritize and provide additional benefits for historically underserved communities, especially those in the eastern and southeastern sides of Plano.
- Require HUD-approved homebuyer education and financial literacy as part of the City's Downpayment Assistance Program eligibility, especially related to credit history and credit application completion issues among minority applicants.

Mid-to-Long-Term Actions (3 to 5 Years)

- Partner with financial institutions and HUD-certified counseling agencies to expand residents' access to credit and lending education.
- Create a financial empowerment program through collaboration to assist with credit repair, loan readiness, and wealth-building.