

Growing Together



Anti-Displacement Agenda for San Antonio

Phase II of Grounded Solutions Network's
ForEveryoneHome Program



**GROUND
SOLUTIONS
NETWORK**

strong communities
from the ground up

Through the ForEveryoneHome initiative, a team of San Antonio's municipal and community leaders are working together to develop anti-displacement and inclusive growth policies for their community. This report summarizes the needs assessment findings and policy recommendations from Phases 1 and 2 of the ForEveryoneHome Initiative — a two-year collaborative effort aimed at helping mixed-market cities¹ manage growth pressures.

Grounded Solutions Network is leading this effort as part of our commitment to building equitable and inclusive communities that are rich in opportunity for all. We selected San Antonio to participate in the initiative through a competitive application process that began January 2019. Other participating cities include Winston-Salem and Indianapolis.

The San Antonio team's purpose is to deepen and advance San Antonio's Housing Policy Framework, particularly the Policy Priority to Prevent and Mitigate Displacement. The team committed to devising and implementing community engagement strategies that ensure broad input into policy recommendations, especially from people with lived experiences of displacement and housing insecurity. This Anti-Displacement Agenda, and the work of the ForEveryoneHome Team are deeply indebted to previously conducted research, analysis, and community conversations. Throughout the report we aim to honor past work and to be non-duplicative.

¹ Mixed-market cities have "hot" housing markets in some neighborhoods, which are characterized by new development and rapidly rising housing costs, but they also have "soft" housing markets, where prices are stable or declining in other neighborhoods.





Members of the San Antonio, Winston-Salem and Indianapolis ForEveryoneHome teams with Grounded Solutions Network staff and consultants.

The San Antonio Team includes:

- ▶ **Pedro Alanis**, Executive Director, San Antonio Housing Trust Foundation Inc.
- ▶ **Monica Cruz**, Ph.D – Housing Advocate
- ▶ **Rebecca Flores**, Housing Advocate
- ▶ **Jose Gonzalez**, Alamo Community Group
- ▶ **Jessica O. Guerrero**, Housing Commission Chair and Board President, Vecinos de Mission Trails
- ▶ **Tuesdaé Knight**, President and CEO, San Antonio for Growth on the Eastside (SAGE)
- ▶ **Richard Milk**, Director of Policy and Planning, San Antonio Housing Authority (SAHA)
- ▶ **Ron Nirenberg**, Mayor, City of San Antonio
- ▶ **Leilah Powell**, Executive Director, LISC - San Antonio
- ▶ **Graciela Sanchez**, Executive Director of Esperanza Peace and Justice Center
- ▶ **Verónica Soto, FAICP**, Director, Neighborhood and Housing Services Department, City of San Antonio
- ▶ **Amin Tohmaz**, Deputy Director, Development Services Department, City of San Antonio
- ▶ **Dianne Triggs**, Housing Advocate and SAHA Resident
- ▶ **Lourdes Castro-Ramirez** (Former Member)

Additionally, the ForEveryoneHome process is guided and staffed by:

- ▶ **Jonathan Butler**, Office of Equity, City of San Antonio
- ▶ **Victoria Gonzalez-Gerlach**, Mayor’s Office, City of San Antonio (Former Staff)
- ▶ **Sasha Hauswald**, Grounded Solutions Network
- ▶ **Phil Laney**, Development Services Department, City of San Antonio
- ▶ **Fabiola Torralba**, Community Engagement Consultant
- ▶ **Dr. Juan Valdez**, Mayor’s Office, City of San Antonio
- ▶ **Sara Wamsley**, Neighborhood and Housing Services Department, City of San Antonio



Our Process

Grounded Solutions Network guided the ForEveryoneHome team through a three-phase policymaking process:

- ▶ **Needs Assessment** — Collect and analyze data and past reports, and solicit input from a wide variety of stakeholders to understand the displacement and inclusive growth challenges the city faces.
- ▶ **Inclusive Growth and Anti-Displacement Policy Agenda** — Produce a set of policy recommendations to address the issues identified in the Needs Assessment.
- ▶ **Implementable Policies** — Take two of the recommended policies from the Policy Agenda and develop them in detail so they can be implemented by the city.

Project Timeline

Timing	Description
January – April 2019	Selection – Issue call for applications, review applications, select cohort members.
May - July 2019	Launch – Introduce ForEveryoneHome members, conduct learning tours, peer sharing activities and webinars.
August – December 2019	Needs Assessment – Gather and synthesize prior work, map available data, conduct site visits, seek community input, draft needs assessment.
January – June 2020	Policy Ideation – Present needs assessment, workshop policy solutions, conduct interviews, seek community input.
June 2020 – April 2021	Displacement Prevention Agenda – Identify best practice models, craft displacement prevention agenda, solicit public input.
April – June 2021	Implementation Plans – Select and develop two policies or programs for rapid implementation, draft detailed policy plans, conduct community outreach.

Our Values

As we proceed through this work, certain values guide what we do.

Community Engagement

We want to follow a strong community engagement process to have this work grounded in community experience and community vision that supports lasting benefits to marginalized communities.

Racial Equity

We want to center racial equity, highlighting policies and practices that will help San Antonio build a thriving and inclusive community.

Peer Learning

We want the teams in our three cities to learn from each other. We have built mechanisms into our process to help them do that. The San Antonio Team includes a broad spectrum of relevant expertise, representation of lived experience, and industry leadership.

Lasting Affordability

We want to lift up the value of lasting affordability — the idea that when we create a unit of affordable housing, it is a community asset that should remain affordable for future generations.

Research and Community Engagement Methods

We aimed to be thorough and innovative in our research and community engagement strategies.

In Phase 1 and Phase 2, we:

- ▶ Gathered and synthesized prior work. A wealth of research and analysis already existed in San Antonio.
- ▶ Analyzed new data from the city, county, state and national sources as well as private proprietary data.
- ▶ Welcomed Grounded Solutions Network for three site visits to San Antonio.
- ▶ Held five in-person listening sessions with impacted community members.
- ▶ Interviewed over 50 local technical subject matter experts, government staff and community representatives.
- ▶ Researched local and national policy and program models.
- ▶ Disseminated a virtual survey in Spanish and English, including the option to complete the survey by phone.
- ▶ Held focus groups — one with renters and another with small landlords to workshop-specific interventions.



The COVID-19 pandemic impacted public engagement during Phase 2. Starting in March 2020, we engaged the community through online technology, email and one-on-one conversation. Our goal was not to achieve sheer numbers of attendees, but to oversample — or overrepresent — those with lived experience of displacement and housing insecurity. We also wanted to hear from diverse low-income populations of color, who are typically underrepresented in the policymaking process. Despite the challenging environment of COVID-19, we achieved these goals. For example:

Five In-Person Listening Sessions

- ▶ 75% of participants in listening sessions made less than \$40,000/year
- ▶ 34% were experiencing homelessness
- ▶ Majority were people of color

186 Survey Responses

- ▶ 56% earned under \$30,000 per year
- ▶ 44% had experienced displacement or knew someone who had
- ▶ 62% identified as Hispanic or Latinx
- ▶ 12% identified as African American or Black.

This report summarizes our needs assessment findings from Phase 1 and our policy recommendations from Phase 2. Community feedback on displacement triggers and pressures guided the needs assessment, while community feedback on proposed solutions guided the policy recommendations in this document.



1 Challenge: Formal eviction, informal eviction and lease non-renewals are too high, and they will rise when national and local moratoriums end

- a. **Action:** Commit to long-term financial support of the Emergency Housing Assistance Program (EHAP) and risk mitigation programs.
- b. **Action:** Scale up Right to Counsel and complementary eviction prevention services.
- c. **Action:** Hold residential building owners who receive significant public benefits — including fee waivers, tax benefits and city-owned land — to higher standards for tenants' rights.
- d. **Action:** Locally implement two state-enabled tenant protections.
- e. **Action:** Expand collaboration with Justice of the Peace (JP) courts to reduce evictions and repercussions of eviction.

2 Challenge: Existing affordable and low-cost rental housing is at risk of loss

- 1 a. **Action:** Convene a Housing Preservation Network.
- 2 b. **Action:** Pass ordinance requiring 18-months notice for currently subsidized, regulated affordable housing developments that intend to convert to market rate or target a higher-income group.
- 3 c. **Action:** Initiate and fund diverse pilot projects to preserve the affordability and quality of unregulated low-priced rentals (sometimes called "naturally occurring affordable housing" or "NOAH" units).
- 4 d. **Action:** Lengthen affordability terms to ensure lasting affordability for rental units with new local investment.
- 5 e. **Action:** Maximize deep affordability and minimize public financing gap for 30% of AMI and below.
- 6 f. **Action:** Explore ways to incentivize or reward landlords who don't have a history of evictions or code violations.
- 7 g. **Action:** Advocate for targeted property tax reductions for small landlords and regulated affordable housing (with legally enforceable rental price restrictions) serving 60% of AMI and below households.
- 8 h. **Action:** Increase home repair and rehab loan or grant programs to qualified landlords in exchange for their agreement to keep rents stable.

Short Term



Medium Term



Long Term



③ Challenge: San Antonio’s manufactured home parks (mobile home parks) are closing

- 🕒 a. **Action:** Explore the creation of narrow zoning designations and work with property owners and City Council to rezone manufactured housing and mobile home parks.
- 🕒 b. **Action:** Fund outreach, education and case management support to mobile home residents.
- 🕒 c. **Action:** Establish minimum habitability standards for mobile homes/manufactured homes, and create funds to ensure their safety.
- 🕒 d. **Action:** Pilot a forgivable loan program for mobile home park owners to address landscaping and sewer system integration.
- 🕒 e. **Action:** Launch a pilot program to convert one or more manufactured housing parks to tenant ownership.

④ Challenge: Homeowners can’t afford rising expenses

- 🕒 a. **Action:** Strengthen outreach, information and counseling services for homeowners.
- 🕒 b. **Action:** Advocate for state tax reform.
- 🕒 c. **Action:** Scale up estate planning and title clearance.
- 🕒 d. **Action:** Increase funding for pre-purchase and post-purchase homeowner counseling services.
- 🕒 e. **Action:** Empower homeowners with the knowledge and time they need to remedy code violations.
- 🕒 f. **Action:** Increase the availability and reach of programs to support simple maintenance, repairs and rehab for low-income homeowners.
- 🕒 g. **Action:** Establish a community land trust to create and preserve affordable homeownership.

⑤ Challenge: City investments and new development increase displacement pressure

Protective Measures

- 🕒 a. **Action:** Cease public support to market-rate development that displaces residents.
- 🕒 b. **Action:** Require one-for-one replacement of demolished or upgraded affordable housing.
- 🕒 c. **Action:** Require disclosure of direct displacement prior to planning approval.

Proactive Measures

- 🕒 d. **Action:** Designate to a displacement mitigation fund a percentage of total investment in large public works projects.
- 🕒 e. **Action:** Expand housing options for people with nontraditional income.
- 🕒 f. **Action:** Expand the Office of Historic Preservation (OHP) Vacant Building Program to 300 square miles, with a goal of creating housing opportunities for families earning 50% of AMI or below.
- g. **Action:** Review existing data to establish complete inventories of vacant land and buildings in San Antonio.
- 🕒 h. **Action:** Prioritize property sales and transfers of publicly owned land for development at price points affordable to households earning 50% of AMI or below. Create a land banking program to proactively acquire parcels in neighborhoods with high-displacement risk.
- 🕒 i. **Action:** In the Strategic Housing Implementation Plan (SHIP) team, identify new sources of revenue for investments in displacement prevention and affordable housing preservation.

A history of discrimination has left San Antonio a city divided. Legacy neighborhoods and low-income families — largely Latinx and African American— witness growth and change, but don't always reap the benefits.

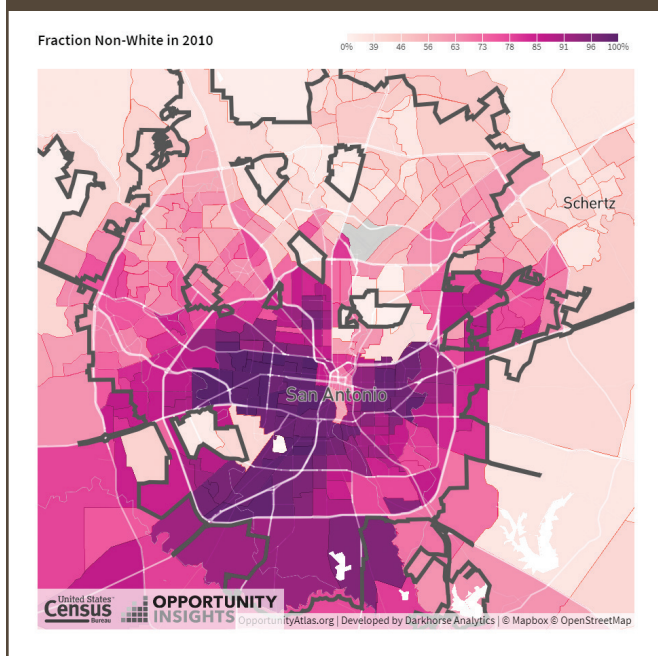
A Highway Around It

The racial divide in San Antonio is not hard to see; just look inside loop 410 to the east, west and south of downtown. These formerly redlined neighborhoods are still, today, over 90% Latinx and African American.

Spatial separation matters because place matters — the neighborhoods that we live in shape our experiences, our opportunities and our collective future. For those residing in neighborhoods where diminishing access to essential goods and services limits opportunities, the possibilities of achieving a more prosperous future are reduced compared to those in vibrant neighborhoods.

As the following pages make clear, the areas of San Antonio where communities of color are most concentrated are often the poorest, most disinvested areas of the city.

Percent People of Color in San Antonio by Census Tract 2018²



Racial Equity

Racial equity is defined as both an outcome and a process.

As a process, it means that people of color are actively leading the creation and implementation of policies, programs and practices that have an impact in their lives.

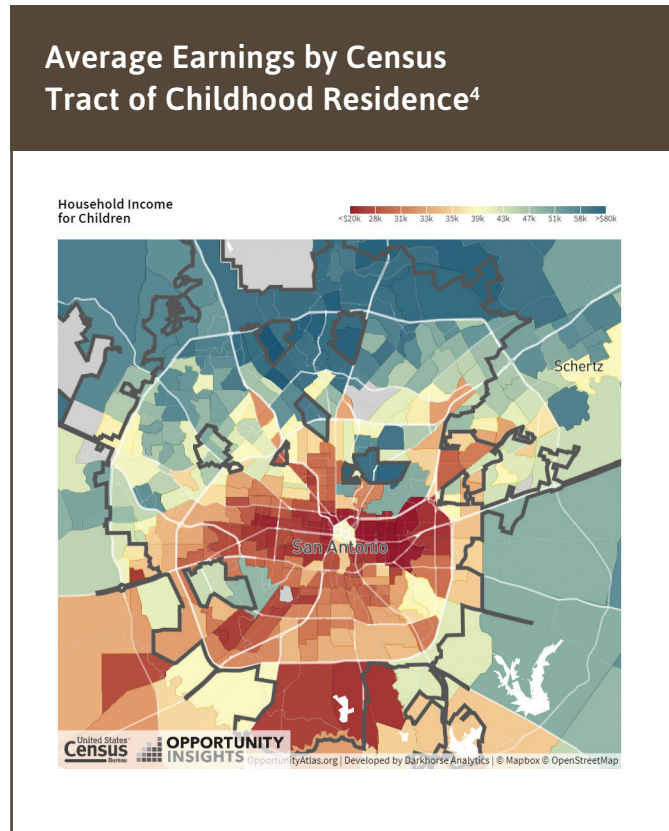
As an outcome, it means that a person's racial identity does not determine their life opportunities and results, such as access to a stable, safe and affordable home.

² <https://www.opportunityatlas.org/>

The Opportunity Divide

Even more troubling than the current racial divide in wealth and income in San Antonio is the Opportunity Atlas assessment of how San Antonio neighborhoods influence their residents' life chances. In collaboration with researchers at Harvard University and Brown University, the U.S. Census Bureau developed the Opportunity Atlas to provide a statistical assessment of children's outcomes in adulthood. The Opportunity Atlas explains its project as follows:

"The Opportunity Atlas is built using anonymized data on 20 million Americans who are in their mid-30s today. We map these individuals back to the Census tract (geographic units consisting of about 4,200 people) in which they grew up. Then, for each of the 70,000 tracts in America, we estimate children's average earnings, incarceration rates and other outcomes by their parental income level, race and gender."



The Opportunity Atlas' analysis shows stark differences in people's average expected earnings depending on where in San Antonio they grew up (see map above.)³

Health, Race and Housing.

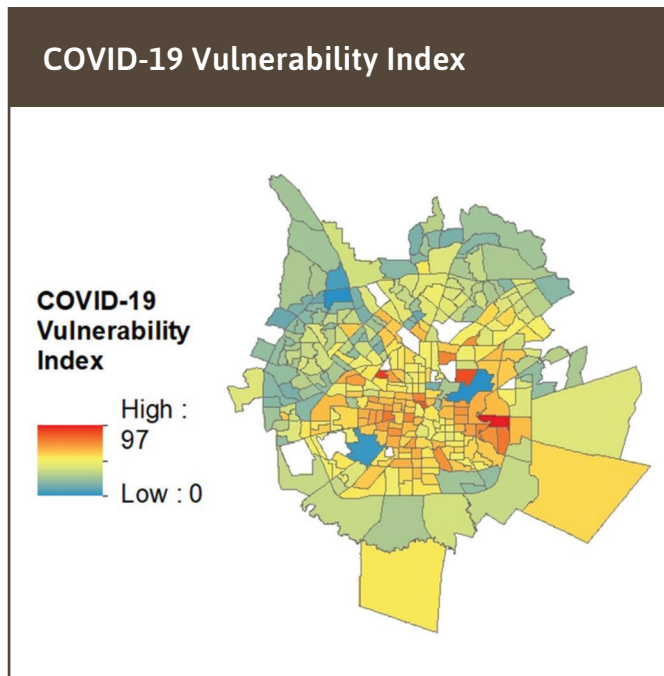
The racial inequities in our community extend well beyond economic factors. The COVID-19 pandemic, for example, has exposed troubling differences in neighborhoods' vulnerability to the disease that break along racial lines. Social Progress has assembled data that highlights these differences.

The organization created a ranking system to assess a community's COVID-19 vulnerability. The system rates communities on three dimensions:

- ▶ The prevalence of underlying health issues associated with vulnerability to COVID-19 (e.g., high blood pressure, asthma, coronary heart disease, etc.).
- ▶ The demographics of the population as it relates to COVID-19 vulnerability (e.g., percent of population that is elderly, the number who are in nursing homes, the number who are incarcerated, etc.).
- ▶ Access to health infrastructure to treat issues that increase vulnerability to COVID-19 or are caused by COVID-19 itself (e.g., percentage of population without health insurance, number of urgent care facilities per 1,000 people within 25 miles, etc.).

³ <https://www.opportunityatlas.org/>

⁴ <https://www.opportunityatlas.org/>



More details on Social Progress' methodology are available on its [website](#). The organization's system produces a vulnerability rating number on a scale of 0 to 100, where 0 represents the least vulnerable community and 100 represents the most. Social Progress applied this rating system to the 500 largest cities in the U.S.

The map to the left shows Social Progress' assessment of the vulnerability of each of the census tracts in San Antonio as of April, 2020.⁵ As with income and opportunity, neighborhoods that are largely people of color are also most vulnerable to COVID-19.

The racial divides in wealth, income, opportunity and risk in San Antonio have been around so long it can be hard to see the mechanisms of exclusion and displacement that set them in place decades ago.

Unfortunately, government action played a significant role in forming or reinforcing racial and economic segregation. Some early efforts sought to explicitly separate San Antonio by race.

- ▶ **Race-based zoning ordinances** in the early 1900s attempted to legislate where residents of color might live. The State Supreme Court struck these down in 1914.
- ▶ From the early 1900s, property owners added **racially restrictive covenants** to deeds, which forbade the sale of property to people of color. This was an attempt to reserve certain neighborhoods and business properties to "Caucasians." State courts enforced these covenants until the U.S. Supreme Court declared such action unconstitutional in 1948 (see *Shelley v. Kraemer*).
- ▶ Beginning in the 1930s, the federal government followed a "**neighborhood composition rule**" that mandated that the racial makeup of public housing mirror the makeup of the surrounding neighborhood. This reinforced racial segregation throughout the city. The federal government dropped the neighborhood composition rule in the 1960s.
- ▶ In the 1930s, federal surveyors rated San Antonio neighborhoods with significant non-white populations as high-risk, "hazardous" areas for making loans. The government refused to back loans in these "**redlined**" areas, and so banks refused to make loans there. Without access to capital, these neighborhoods languished and declined. These discriminatory government practices continued until the Fair Housing Act of 1968 banned them. Historically redlined areas of San Antonio remain some of the most disinvested today.

⁵ <http://us-covid19-vulnerability.socialprogress.org/>

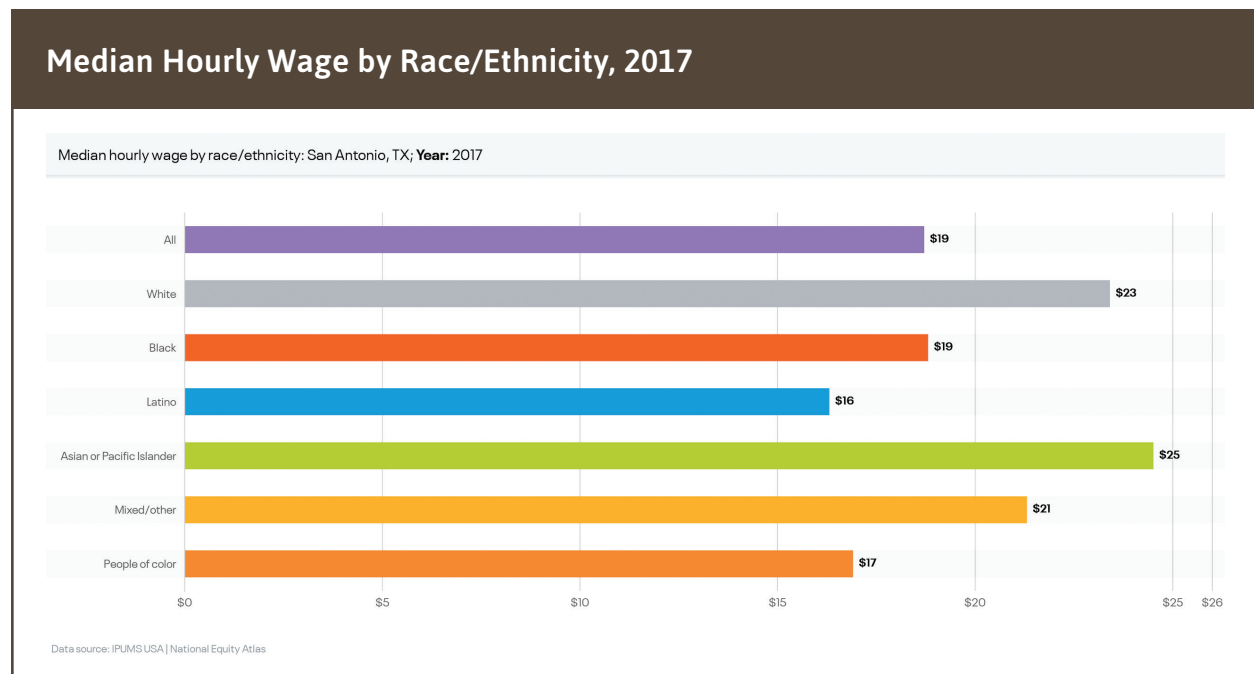
- ▶ The boom years after WWII laid the foundation for wealth accumulation and prosperity for many white families, facilitated in no small part by the GI Bill. The GI Bill provided a government-guaranteed housing loan to veterans, enabling millions of families across the country to become homeowners. However, Black and Latinx veterans generally were not able to take advantage of the GI Bill because banks would not make loans for mortgages in communities of color, and people of color were excluded from other neighborhoods — and from the suburbs to which many white families were moving — through restrictive covenants and informal racism.⁶
- ▶ In the 1960s, San Antonio used federal urban renewal funds to target older communities of color for “blight removal.” For instance, the neighborhood southeast of downtown — a diverse working class neighborhood of Latinxs, African Americans and immigrants — was demolished to make land available for the World’s Fair. Over 1,300 buildings were torn down.⁷

These and other institutional and individual factors sowed the seeds of the racial equity gaps in our community today, leading to the stark differences in opportunities and outcomes experienced by people of different races.

Differences in Opportunity and Outcomes by Race

Income

The median hourly wage for non-Latinx white residents in San Antonio was \$23 in 2017. For Latinx residents, the median wage was only \$16 per hour.⁸



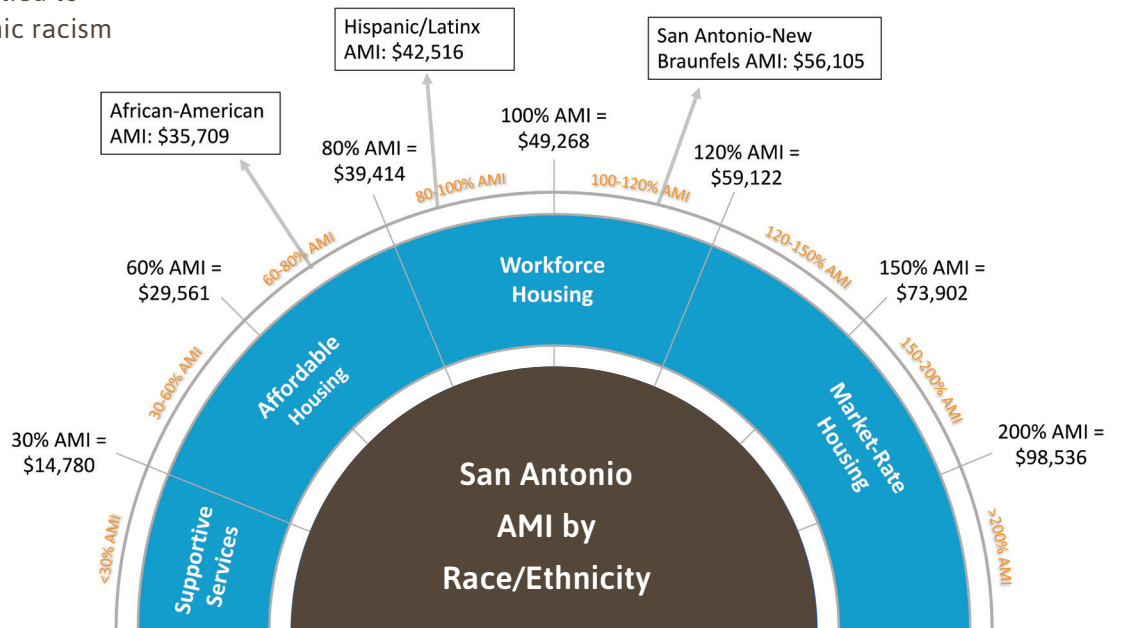
⁶ Rothstein, Richard, *The Color of Law*, 2017

⁷ <https://www.tpr.org/arts-culture/2018-04-16/what-came-before-the-demolished-neighborhood-that-made-way-for-hemisfair-68>; <https://www.expressnews.com/sa300/article/The-neighborhood-that-HemisFair-68-erased-12044533.php>

⁸ https://nationalequityatlas.org/indicators/Wages_Median#/?breakdown=2

Income disparities exacerbate housing inequality. HUD defines housing as “affordable” when it costs 30% or less of the occupant’s income, but for every \$1 a white person makes in San Antonio, a Latinx person only makes 69 cents. Furthermore, Latina women earn 50 cents and Black women 54 cents for each \$1 that Non-Hispanic White males make.⁹

Income disparities tied to historic and systemic racism and sexism are one reason we focus on housing that is affordable to households earning 50% or less of AMI throughout this report.



Sources: U.S. Census ACS 1-year estimates, 2016; Housing Policy Framework.
Data notes: The San Antonio-New Braunfels AMI referenced is the median income across households of all sizes. All other AMI numbers in the diagram refer to median household incomes within the City of San Antonio.

Affordable to Whom?

In the housing field, the Area Median Income (AMI) is used as a reference point to define the target population within a Metropolitan Statistical Area (MSA) for government-supported housing. An MSA is a region that consists of cities and surrounding communities that are linked by social and economic factors. The city of San Antonio is part of the San Antonio-New Braunfels MSA, which includes both cities and eight counties. Therefore, when the AMI is used for government-supported housing, it takes into account a larger geographic population beyond a city or community. The San Antonio - New Braunfels AMI is \$72,000 for a family of four; 50% of AMI is \$36,000 for a family of four. However, the median income in the City of San Antonio is lower than the regional AMI used by developers to set rent levels. While rental housing for families earning 80% AMI is often considered “affordable”, due to regional and racial income disparities, recommendations of the Anti-Displacement Agenda focus on creating and preserving housing affordable to households earning 50% or less of the regional AMI for San Antonio.

⁹ Status of Women in San Antonio Report

Displacement Defined

Displacement occurs when an individual or family is forced to move from their home involuntarily. It occurs because of evictions, demolitions and foreclosures (sometimes called direct displacement), as well as economic factors like large rent increases or rising homeownership costs. Displacement can also occur due to unlivable conditions like mold, utility cutoffs, landlord harassment or pests. Finally, displacement can be the result of building rehabilitation or reconstruction. Housing displacement is not only traumatic, it can disrupt school, employment and social networks, or even result in homelessness.¹⁰

Neighborhood displacement rises when changes in housing costs make it unaffordable for those who previously could afford to live there, typically leading to an influx of more affluent, often white residents. Cultural displacement occurs through changes in the racial and ethnic makeup of a neighborhood, and through changes in the shops, services and institutions that serve and operate in a neighborhood. These changes can signal longtime residents and prospective new residents of a similar background that they no longer belong in the neighborhood. Combined, these forces can push low-income communities of color out of neighborhoods just at a time when conditions, amenities and property values there are improving.

Displacement Vulnerability

The National Association For Latino Community Asset Builders (NALCAB) completed a groundbreaking analysis of neighborhood-level housing vulnerability in San Antonio in 2018. Their analysis of census data shows that a large number of census tracts in low-income areas near downtown are experiencing rapid change in terms of housing costs and demographics.

NALCAB's findings are both San Antonio specific and representative of a larger trend. Across the nation, city centers that were formerly disinvested communities of color have been experiencing a renaissance of growth, partially fueled by in-migration and new development. Unfortunately, thriving city centers are often accompanied by high housing prices that push away longtime residents, often people of color who invested time and labor in the neighborhood through decades of public and private neglect.

In San Antonio, public investment in the urban core has improved neighborhoods with amenities like the Riverwalk and has created higher-end, higher-density housing. These public investments likely accelerated and heightened changes. Increased density, vitality and amenities in downtown are positive changes, but they also increase displacement pressure in the surrounding neighborhoods. We will discuss this in more detail in the final section of this report.

¹⁰ [Urban Displacement Project](#)

Cross-Cutting Themes

The ForEveryoneHome Team noticed the following cross-cutting themes that do not fit neatly into any single section of the five discrete report sections that follow. These themes reinforce and build-upon the Housing Policy Framework recommendations, which were themselves produced with extensive community and public input. Addressing these systemic challenges is of equal, if not greater, importance to implementing topic-specific policy recommendations.

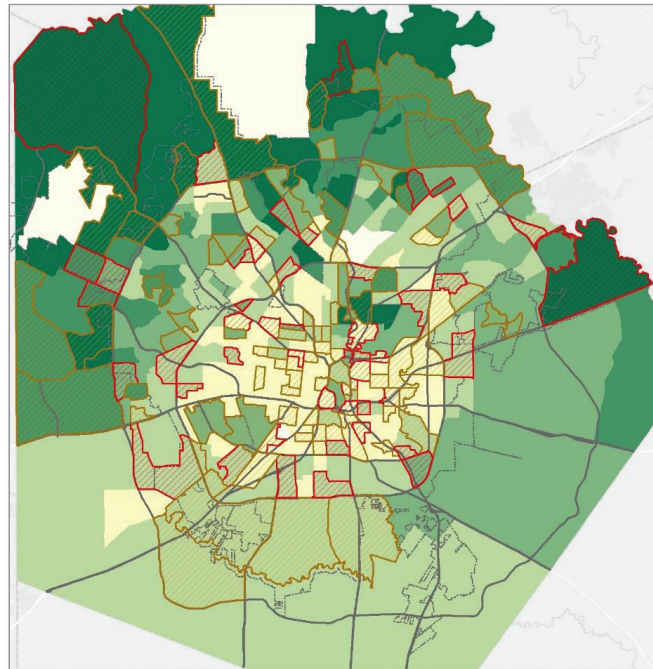
1 Intersectionality:

Displacement is not limited to housing issues. Residents are concerned about the loss of neighborhood amenities such as trees and greenspace, increased traffic congestion, disappearing cultural spaces, and turnover in local businesses. These, like housing prices, are related to economic growth and demographic changes in San Antonio. Conversely, housing quality and stability has numerous benefits beyond displacement prevention. Many of the recommendations that follow will improve climate resilience and public health by improving the quality of residential buildings and the stability of individual families.

In line with the ForEveryoneHome Initiative, we limited this analysis to focus on housing displacement and did not tackle other priorities for public and community investment. We limit discussions about benefits to the realm of safe, affordable, and stable housing. The city may wish, in a separate effort, to further consider the intersectionality of neighborhood change, and what types of non-housing changes are desirable — or undesirable — for San Antonio's future.

Neighborhood Change Score and Median Household Income by Census Tract

Neighborhood Trend Analysis 2013 - 2018



Sources: NALCAB

2 Coordinated Housing System: San Antonio needs accessible information, connections between service providers, and more case managers to help tenants, owners and landlords navigate their rights, responsibilities and available supports. Individuals with housing-related troubles — including homeowners, landlords and tenants — are often simultaneously tackling other life challenges. Housing instability can be a symptom of job loss, health problems, addiction, domestic abuse, divorce or a death in the family.

Currently, San Antonio’s government and nonprofit sector offer numerous services and supports, but they do not connect well with each other. This problem was identified in the Housing Policy Framework as the need to Develop a Coordinated Housing System. The Housing Policy Framework recommends funding proactive outreach and counseling to low- and moderate-income households experiencing housing vulnerability, funding a one-stop housing center with an online portal, and creating an executive position to integrate housing-related activities across city departments.

The recommendations of the Housing Policy Framework to Develop a Coordinated Housing System is critical for racial and economic equity. Those with less information, less education and less confidence to self-advocate will be most likely to “fall through the cracks” of an uncoordinated social safety net, while those with wealth, health and education are most likely to identify and utilize publicly funded services.

The report that follows identifies dozens of different agencies and organizations necessary to carry out the Anti-Displacement Agenda, so implementation cannot occur without leadership and mutual accountability beyond the current structure of San Antonio’s housing system.

3 Deep Affordability: Preserving the stability, quality and affordability of currently low-cost housing — both subsidized and unsubsidized, multifamily and single family — for families below 50% of area median income (\$36,000 gross income for a family of four) is a critical racial equity issue.

San Antonio’s rental housing market is meeting the needs of individuals and families earning 50% of AMI and above far better than those at lower income levels. About half of the rental market is affordable to households earning 60% of AMI, while only a small proportion is affordable to households below 50% of AMI. To meet HUD’s affordability standard, a family of four at 50% of AMI needs a three-bedroom apartment that costs less than \$900/month.

To make matters worse, few of the city-supported affordable housing developments target below 50% of AMI. Even counting public housing and units still under construction, only 22% (6,927) of San Antonio’s total subsidized rental stock (32,015) is affordable to households earning 50% of AMI or less. Housing Choice Vouchers, when landlords accept them, are an invaluable support to 13,256 households, but this resource is not enough.

4 Accountability to the Public: Government-community relations need strengthening. In internal discussions and community events, individuals said they felt disrespected by local government entities. Other residents believe the government is concertedly working against the interests of low-income people and people of color. This pervasive lack of trust hinders efforts like ForEveryoneHome and other intentions for inclusive agenda setting. When these issues arose in the ForEveryoneHome process, we encouraged transparent dialogue and endeavored to build trust, but improving the communication between policymakers in government, nonprofit leaders and community members must be an ongoing process. The Housing Policy Framework offers two recommendations to increase accountability to the public¹¹. Some additional suggestions include:

1. Staff, fund and allow time for broad grassroots outreach and engagement in the “formation process” of new government policies, programs and investments.
2. Respect the time and expertise of community members by offering financial compensation.
3. Communicate back about final decisions and how community input was formative.
4. Collect data and publicly report on policy and program outcomes (e.g., dollars spent, families helped, units built, etc.)
5. Collect data and publicly report on demographics of program users to ensure racially equitable outcomes.
6. Build in community leadership for ongoing evaluation of programs and services.



Report Structure

Aside from the cross-cutting themes discussed above, the Anti-Displacement Agenda recommendations are organized into five sections. Each section below describes a displacement threat and then proposes solutions for that challenge. The first displacement threat to be discussed is Eviction.

- 1 Eviction**
- 2 Loss of affordable rental housing**
- 3 Mobile home park closures**
- 4 Rising homeownership expenses**
- 5 Public investment**

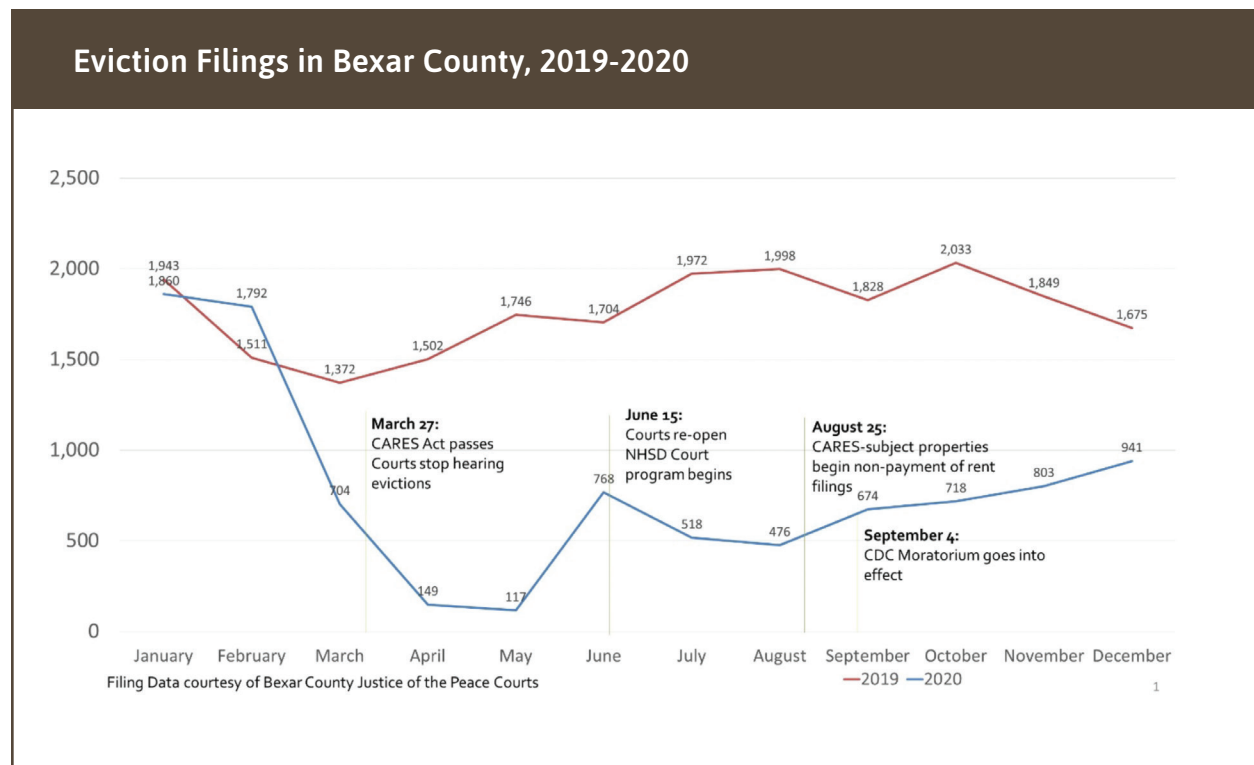
¹¹ Action Item #5: Ensure Accountability to the Public. Strategy: Redefine the Housing Commission as a public oversight board to guide the implementation of the MHPTF’s recommendations and engage the public. Strategy: Develop and annual report to track and publicly report results of the full housing system, including but not limited to: unit production, cost burden, preservation, rehabilitation, leverage and rental production for 0-30% AMI and 30-50% AMI.

The Challenge: Formal eviction, informal eviction and lease non-renewals are too high, and they will rise when national and local moratoriums end.

Eviction findings are indebted to the work of Texas Housers, who collected and analyzed data on court filings between January 2010 and June 2019.

Prior to COVID-19, formal eviction rates were rising in San Antonio. With over 12,000 evictions per year, formal eviction was the single largest driver of direct displacement in San Antonio. Furthermore, formal evictions represent only a fraction of the forced moves that can occur through pressure or coercion from a landlord. “Informal eviction” or “soft eviction” due to landlord-tenant disputes, inability to pay rent, or lease non-renewals are at least double the number of formal evictions.¹²

Most landlords regard a formal eviction notice as the last resort, and many work with their tenants to accommodate short-term issues. Data show that eviction filings in San Antonio are concentrated among a subset of multifamily properties. High evictors (those with at least 50 eviction filings over the 9½-year study period) were responsible for 62,269 eviction filings between January 2010 and June 2019.



¹² Andrew Flowers. “How We Undercounted Evictions By Asking The Wrong Questions.” FiveThirtyEight, 15 Sept. 2016, <https://fivethirtyeight.com/features/how-we-undercounted-evictions-by-asking-the-wrong-questions/>

	2015	2016	2017	2018
Evictions Filed	16,144	16,755	16,668	15,925
Households Evicted (Estimated)	11,990	12,816	12,943	12,535

The state’s landlord-friendly legal climate also likely contributes to San Antonio’s high eviction rate.

Among the laws that favor landlords:

- ▶ Strict and speedy eviction process. Landlords in Texas can evict tenants for any violation of the lease, including a failure to pay rent on time. Rent is considered late after a one-day grace period, and late fees may be charged starting on the second day. If the rent is not paid in full within three days of notice, the landlord may file for eviction.
- ▶ No limit on the amount of security deposits or “risk fees,” which are non-refundable deposits. Landlords are free to set security deposits at any level they deem reasonable, which can leave already cash-strapped renters with even fewer resources to weather economic crises. When a tenant vacates, the landlord has 30 days to return the security deposit, making it difficult for tenants to find the resources to pay a security deposit on their next rental unit.
- ▶ Like many other states, tenants living in housing that is in need of repair have the right to withhold rent until the repairs are made, or make the repairs themselves and deduct the costs from the next month’s rent. However, landlords can also refuse to pay for repairs if tenants are behind on rent payments.

The eviction trend has been interrupted by COVID-19, as moratoria on eviction that have been imposed at the national and county level. SAHA suspended evictions on March 16, 2020. Justice of the Peace Courts all closed effective March 23 after the declaration of a public health emergency by Bexar County Judge Nelson Wolff (highest ranking elected official in Bexar County). Between June 15 and June 22 2020, all four precincts reopened on abbreviated schedules and/or for emergency hearings.

In September 2020, the federal Centers for Disease Control and Prevention (CDC) announced a nationwide moratorium on evictions due to nonpayment of rent through March 31, 2021. The order was issued as a public health measure to combat the spread of COVID-19. To qualify, tenants must deliver a notice to their landlord stating that they do not make more than \$99,000 a year — or twice that if filing a joint tax return — and that they have no other option if evicted other than homelessness or living with more people in close proximity. The CDC order provides no financial support for either tenants or landlords, however. Accordingly, if tenants are unable to meet their rent obligations by the end of January, they will face eviction again.

Current Interventions

Awareness

The city has greatly increased outreach during the COVID-19 health crisis to ensure tenants are aware of [federal moratoriums, local supports and other resources](#). The City of San Antonio also passed the [Notice of Tenants' Rights Ordinance](#) (NOTR) that requires any Notice to Vacate for Non-Payment of Rent to be accompanied by information for tenants about the eviction process and available financial resources.

Financial Support

In addition, the city scaled up the Risk Mitigation Program into a \$52 million program for Fiscal Year 2020, and an additional \$24 million program for Fiscal Year 2021. The city's Emergency Housing Assistance Program (EHAP) offers up to \$5,000 in emergency rent, mortgage, utility (including internet) and cash assistance to low-income households. However, only families who have lost income due to COVID-19 qualify. [The EHAP performance dashboard](#) tracks households approved and dollars spent.

The Provider Liability Assurance for Community Empowerment (PLACE) program is an insurance pool funded by the city and administered by the South Alamo Regional Alliance for the Homeless (SARAH). Through this program, landlords can receive up to \$1,500 as compensation in the event a tenant breaks the lease early or damages the unit. To participate in the program, landlords must agree to waive screening criteria and waive (or reduce) "risk fees" for clients with eviction or criminal records. This pilot is 13 months old and has had 20 people housed. Only one landlord has ever requested payout, and it was below the program limit.

Legal Support

The Right to Counsel program, led by Texas Rio Grande Legal Aid (TRLA), provides legal aid to households at or below 100% of AMI that are facing eviction. As of August 2020, 88 households had been served. The initial pilot was extended by the city with an additional \$295,000 of federal stimulus funding. This funding supports individual clients, monthly Know-Your-Rights trainings, and city staff in the courts as a virtual help desk. San Antonio Legal Services Association (SALSA) supports the Right to Counsel with record expungement and ID recovery for homeless individuals.

St. Mary's School of Law Tenant Hotline receives about 200 to 300 calls each day. With increased demand, they've started screening to focus on people who are experiencing eviction. They offer brief consultations and referrals. It is staffed primarily by St. Mary's law students.

The [Bexar County Dispute Resolution Center](#) provides free mediation for landlord-tenant (and many other) issues. It is staffed primarily by volunteers.

This city is developing a \$300,000 plan to install kiosks in libraries, at Haven for Hope homeless services campus, in municipal courts, and in Financial and Housing Recovery Centers. Kiosks will be an entry point for people to access legal services, including initial applications, follow-up intake interviews, consultations with attorneys, etc.

a. **Action:** Commit to long-term financial support of the Emergency Housing Assistance Program (EHAP) and risk mitigation programs.

Leads: City Manager's Office and City Council

Supporting Entities: Neighborhood and Housing Services Department, Department of Human Services, Office of Equity, Office of Economic Development

The City has been responsive to the COVID-19 impacts on San Antonio. As housing instability continues and evolves, the city is tracking housing insecurity factors and outcomes for EHAP recipients. Some features that are important to maintain or incorporate into the program will be:

- ▶ Resume ongoing program evaluation with leadership from those with lived experience.
- ▶ Use data collected through the program to inform displacement prevention policies and program investments.
- ▶ Ensure a minimal administrative burden to tenants and owners for application or receipt of funds.
- ▶ Aim for non-exclusive qualifying criteria to ensure that undocumented immigrants, people experiencing homelessness, and those whose needs are not directly related to COVID-19 can access funds.
- ▶ Robust, multi-lingual, multi-modal outreach.
- ▶ Resume three months of housing related payments toward stabilizing applicants' housing.
- ▶ Ensure long-term impacts by hiring and training full-time case managers to provide support to program applicants.

b. **Action:** Scale up Right to Counsel and complementary eviction prevention services.

Leads: Neighborhood and Housing Services Department

Supporting Entities: Texas RioGrande Legal Aid (TRLA), San Antonio Legal Services Association (SALSA), Bexar County Dispute Resolution Center, St. Mary's School of Law

The saying goes, "An ounce of prevention is worth a pound of cure." The Right to Counsel pilot, like EHAP, has proven a powerful and relatively low-cost way to keep San Antonians housed. A cost-benefit analysis of the Right to Counsel pilot calculated the return on investment for funding Right to Counsel services. Highlights of the analysis include:

- ▶ Preventing someone from becoming homeless by helping them not be evicted saves an average of \$2,944 in health care costs.
- ▶ Research indicates that instability at home, stress from evictions and moving schools increases the probability that students will not complete high school. Not completing high school results in an average wage reduction of \$19,704 per year.
- ▶ The social return on investment is \$20 per dollar spent.

The Right to Counsel pilot should be expanded and publicized to make sure all renters faced with an eviction notice, and who have a legitimate objection, have fair access to representation.

Early guidance and services to prevent eviction are also needed. Eviction proceedings could be avoided with stronger case management, outreach, trainings and landlord supports. San Antonians at every income level want and deserve agency to plan their future, but without information about their housing rights and options, renters are less able to restabilize after life-altering events like illness or loss of work. To prevent displacement during COVID-19, the City of San Antonio has taken steps to strengthen eviction prevention support and services. These efforts are a starting point; to build a long-term eviction prevention infrastructure, the city should:

- ▶ Add information on Tenant Legal Rights and Mobile Home Tenant Rights to the Notice of Tenants Rights (NOTR) that landlords must provide to tenants whenever they provide a Notice to Vacate for Nonpayment of Rent. Currently, the required focuses on resources. Continually update, incorporate community feedback and distribute the Notice of Tenants' Rights.
- ▶ Pass an ordinance requiring that landlords provide summary of rights and resources upon signing a lease and with any notice to vacate.
- ▶ Initiate a landlord academy and resource center to support landlords. Partners in this work could include the San Antonio Apartment Association (SAAA), Texas RioGrandeLegal Aid (TRLA), San Antonio Housing Authority (SAHA), and Building and Strengthening Tenant Action (BASTA).
- ▶ Fund increased tenant/landlord mediation services to keep cases out of the courts. Partner with Justice of the Peace courts to encourage mediation as a required step, at least in eviction proceedings for nonpayment of rent or fees. Solicit support from the San Antonio Apartment Association (SAAA) to inform landlords about the value and availability of mediation services.
- ▶ Build a team of case managers focused on tenant issues. There should be a well-known point of entry where any renter can speak with a counselor trained on tenant/landlord law and available emergency supports. The city could possibly expand the existing hotline operated by St. Mary's University's Center for Legal and Social Justice. They could also build off strategies for intake developed by the South Alamo Regional Alliance for the Homeless (SARAH) for the Coordinated Entry System.
- ▶ Enable call takers to connect individuals and families to long-term case management, in addition to providing light-touch advice and referrals. Case managers, working with discrete and manageable caseloads of families, can help low-income renters navigate the complex and opaque web of services and supports they need to become housed in affordable, healthy and stable conditions. This includes connecting individuals and families to non-housing services like food and job training.

Model: The City of Indianapolis has recently adopted an ordinance that addresses some of the challenges tenants face in the state’s landlord-friendly legal climate. Specifically, the January 2020 ordinance:

- ▶ Requires landlords to provide tenants with a notice of tenant rights and responsibilities when they sign a lease.
- ▶ Creates an information hotline to give tenants information and advice about their rights.
- ▶ Penalizes landlords who retaliate against tenants for exercising their rights to a health department inspection, to call the information hotline or to seek legal assistance.

c. Action: Hold residential building owners who receive significant public benefits — including fee waivers, tax benefits and city-owned land — to higher standards for tenants’ rights.

Leads: Neighborhood and Housing Services Department (NHSD), Center City Development and Operations Department (CCDO), San Antonio Housing Trust (SAHT), San Antonio Housing Authority (SAHA) San Antonio Apartment Association

Supporting Entities: Texas RioGrande Legal Aid (TRLA), University of Texas at San Antonio (UTSA), Fair Housing Council of Greater San Antonio

These recommendations were informed by the Uprooted Project’s [Texas Anti-Displacement Toolkit](#) and the UT Austin report on [Public Facilities Corporations](#)¹³.

When the City of San Antonio, SAHA or SAHT provide significant public financial support to residential developers, recipients should serve the public good by providing safe, stable, quality housing to tenants. The City can require tenant protections of locally supported developers following the models established by HUD and Texas Department of Housing and Community Affairs (TDHCA). The city should reference and align local requirements with both federal requirements of Section 8 landlords, and TDHCA requirements of Low Income Housing Tax Credit (LIHTC) recipients. In addition, the City should also require all landlords receiving public benefits to comply with business practices that enhance stability for tenants:

- ▶ Require “good cause” or “just cause” for lease non-renewals, meaning there must be a valid reason to not renew. Good/Just cause rules typically include a number of justifiable reasons for non-renewal including lease violation.

¹³ https://law.utexas.edu/wp-content/uploads/sites/11/2020/09/2020-ECDC-PFC-Report-Executive_Summary.pdf

- ▶ Include a right to cure any lease deficiencies.
- ▶ Seek third party mediation services prior to filing an eviction.
- ▶ Include a right to organize — [BASTA](#) is an example of successful organizing for tenant protections in Austin.

Model: The City of Austin requires similar protections in all apartment developments it funds as well as private activity bond projects it approves.¹⁴

d. Action: Locally implement two state-enabled tenant protections.

Leads: City Council, Mayor's Office

Supporting Entities: City Manager's Office, Bexar County Court of Commissioners, Office of Equity, Neighborhood and Housing Services Department, Texas RioGrande Legal Aid, American GI Forum, Good Samaritan Veterans Outreach Center

Two legal protections that are already allowed by the state, but have not been passed locally, would enhance stability and agency for some tenants. Landlords in our focus group had varying reactions to the array of tenant protection options we discussed together, but notably, city-required provision of a rent ledger received unanimous approval.

- ▶ Require that landlords provide renters with a detailed accounting report of rents and fees paid (a rent ledger) upon request. Tenant advocates assert that some landlords fail to provide transparent accounting to back up accusations of nonpayment of rent or nonpayment of late fees. While the courts can request this information, they do not always do so. This law would enable tenants themselves to see where their payments have gone and if anything is missing from the ledger. It would also help renters find a new home by allowing prospective landlords access to their rent payment history. The rent ledger should be provided both in hard copy and electronic format to tenant.
- ▶ Ban source of income discrimination for veterans, as allowed under state law. Currently, San Antonio landlords may turn down veterans who are otherwise qualified applicants because they have a non-traditional source of income such as a HUD-VASH voucher. The City, as Military City USA, should adopt source of income discrimination protections to ensure fair housing opportunities for veterans. This is the only type of local source of income anti-discrimination law currently allowed by the state.

¹⁴ <https://sites.utexas.edu/gentrificationproject/files/2019/09/Part-6.-The-Toolbox.pdf>

e. **Action:** Expand collaboration with Justice of the Peace (JP) courts to reduce evictions and repercussions of eviction.

Leads: Neighborhood and Housing Services Department (NHSD), Bexar County-Economic & Community Development, Justice of the Peace Courts

Supporting Entities: Texas RioGrande Legal Aid (TRLA), San Antonio Legal Services Agency (SALSA)

In Texas, Justice of the Peace courts process and preside over eviction filings. Precinct judges are elected officials who rule according to state code but also have broad discretion to set court policies and processes. NHSD staff and the Right to Counsel team have begun building relationships with judges in implementing the Emergency Housing Assistance Program. NHSD should proactively build relationships with judges and advocate for high-impact procedural changes. Changes, such as those below, should be consistently applied, to the extent possible, across all precincts for fairness and transparency to renters and landlords.

- ▶ Seal Tenant Records. Tenants who have had an eviction filed against them, even if they win the case, can be denied by future landlords who search court records. One bad landlord or financial hit follows people for decades. Local courts could choose to seal court records for judgements in favor of the tenant, and do the same for no-fault eviction cases. Similarly, courts could seal cases where eviction was the result of COVID-19 health or economic impacts facing the tenant.
- ▶ Require Fair Housing Act and procedural trainings for court staff. Court staff are on the front lines with both tenants and landlords, but receive too little training on federal and state protections. Local tenant advocates in particular raise concerns that court staff may misinform tenants about the eviction process and about their rights under the Fair Housing Act. Trainings for court staff are a simple solution that could help thousands of tenants in crisis.
- ▶ Require proof of “good/habitable condition” to grant an order to evict. Landlords in Texas must, by law, provide rental housing that meets basic habitability standards. Tenants understandably withhold rent when their landlord fails to meet this responsibility, but they can then be threatened with eviction for nonpayment. Courts could support habitability across the city and prevent some evictions by “bad actor” landlords simply by requiring proof of good/habitable condition to grant an order to evict.

Model: Cleveland Housing Court

The Cleveland Housing Court has jurisdiction over landlord-tenant actions, code violation prosecutions, nuisance abatement actions and mortgage foreclosure actions. Importantly, the court also supports a wider array of services to prevent evictions. It maintains a staff of housing specialists who provide landlords and tenants information about their housing rights and responsibilities. Housing specialists also offer referrals to court-run mediation services, help residents resolve landlord-tenant disputes, and support clients in accessing financial assistance and home-repair services.

Cleveland Housing Court also refuses to allow landlords to pursue eviction actions if they have unresolved citations for poor housing conditions in any of their properties. This helps bring more properties into compliance, even where the cited properties are different from the properties for which the landlord seeks an eviction.

Finally, the [Cleveland Housing Court sealing rule](#) makes it easier for tenants to request sealing of eviction records. A tenant can request the expungement of an eviction record if they meet the following criteria:

- ▶ The case was dismissed by the court or the tenant prevailed.
- ▶ Sealing the case was part of a settlement agreement.
- ▶ The landlord agrees in writing.
- ▶ Five years have passed since the tenant last had an eviction granted against them and they demonstrate that “extenuating circumstances” led to the eviction.

Records can be “unsealed” if the need is demonstrated.

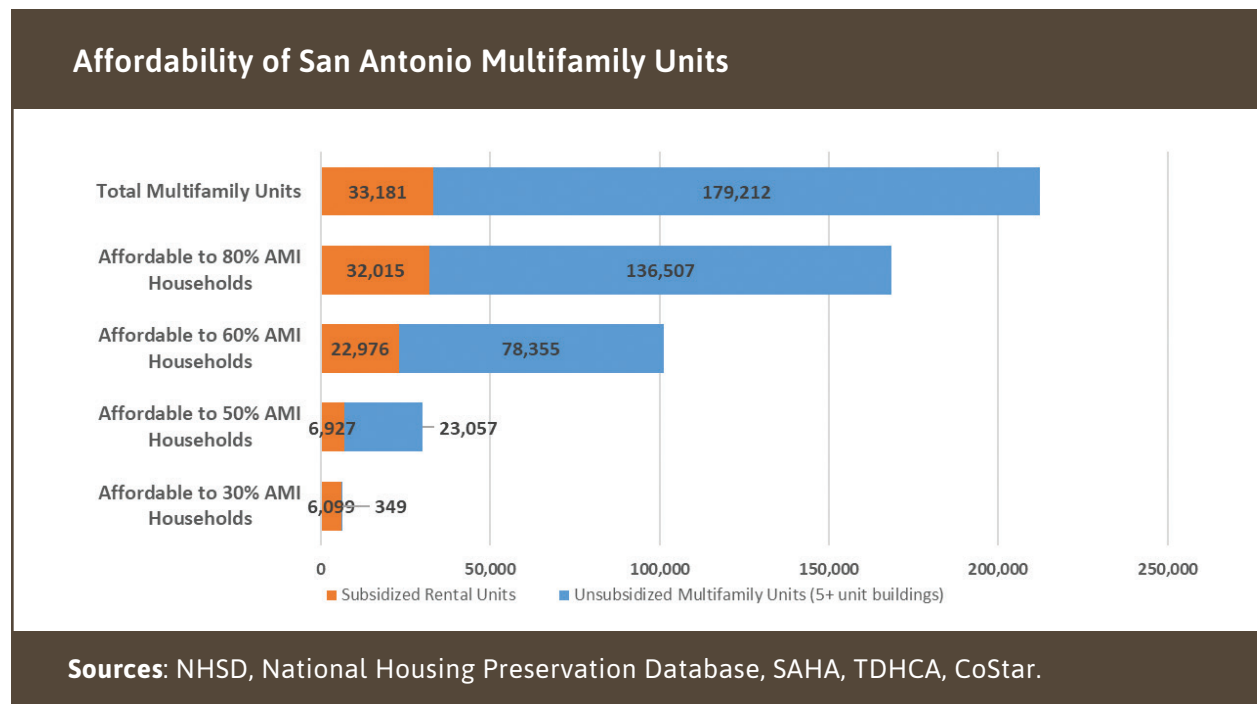
The Challenge: Existing affordable rental housing is at risk of loss.

Affordable rental options in San Antonio are rapidly disappearing — especially for low-income households.

Unregulated low-priced rentals

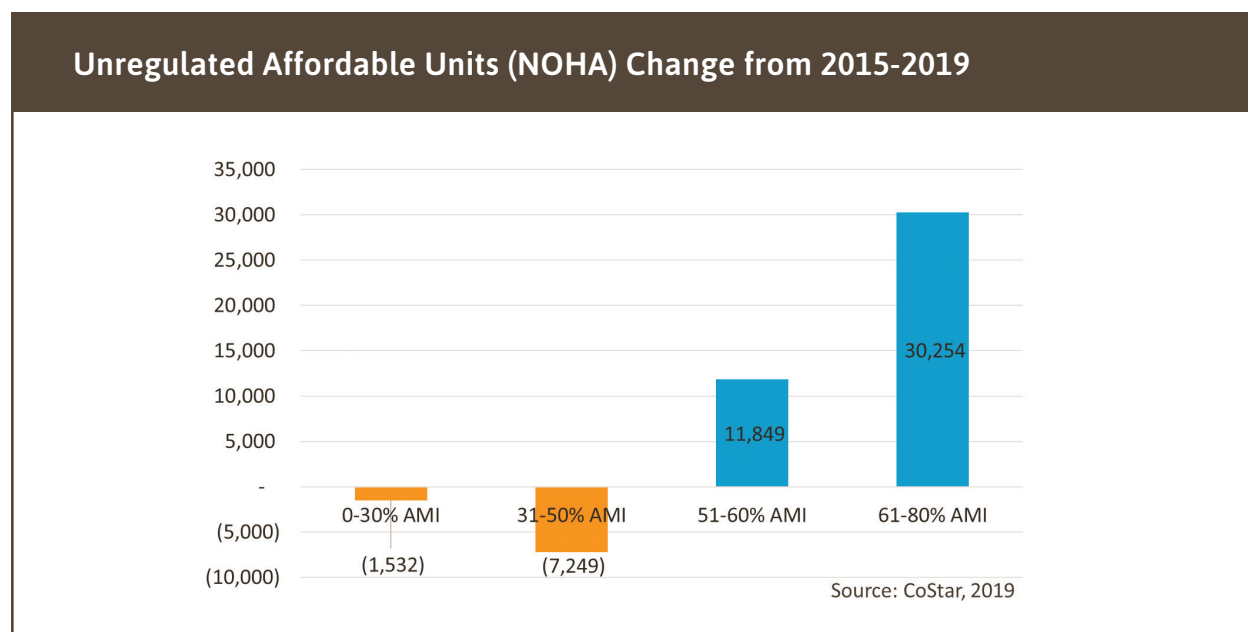
(also called Naturally Occurring Affordable Housing, or “NOAH”)

We often think of affordable housing as large regulated, government-supported developments like public housing developments. However, the vast majority of low-income individuals and families live in housing that is not government supported or regulated. There are approximately 60,000 unregulated single family rental homes and multifamily apartments in San Antonio priced affordably¹⁵ for households earning 50% AMI¹⁶, but only 6,927¹⁷ subsidized rentals at that price point. Housing Choice Voucher holders, as well as other lower-income families, rely on these low-cost, unregulated rental houses and apartments.



¹⁵ Affordable in this context means rent is less than 30% of the household’s gross income.
¹⁶ Data based on Grounded Solutions Network calculations using ACS 2012-2016 data on single-family rentals and 2-4 unit rental buildings, as well as 2019 CoStar data for rental buildings 5 or more units in size.
¹⁷ Includes units considered Pipeline Units by NHSD in 2019. Public housing units make up most of the deeply affordable units in San Antonio (5,632). As of 2020, there are only 1,295 affordable housing units that target 50% or 30% of AMI households. Data on subsidized units aggregated by Grounded Solutions Network from multiple sources: NHSD, National Housing Preservation Database, SAHA, TDHCA. In subsidized units, the maximum allowable income level for the unit does not always reflect the actual rent level for a specific tenant. In some cases, the income level of tenants as well as their rent calculations might be lower than the maximum allowable.

This important stock of affordable homes is vanishing. Between 2015 and 2019, almost 9,000 units of unregulated low-cost rentals in large apartment buildings lost affordability due to rising rents and upgrades – see data in the chart below.¹⁸ As of 2019, only 13% (23,057) of units in large apartment buildings were affordable to households earning 50% of AMI (\$36,000 per year for a family of four).¹⁹



While it would be easy to blame profit-seeking landlords, in fact, property owners in San Antonio often raise rent by necessity. In recent years, rising property taxes, high utility costs and aging properties have made it hard for some owners to cover expenses. This challenge is now severe for landlords whose tenants have lost income and the ability to pay rents due to COVID-19.

A mismatch in supply and demand at the low end of the market is also driving up housing prices. San Antonio’s population is growing quickly, and construction of modestly priced housing is not keeping pace with demand. Meaning, landlords can ask more for their vacant units and find willing renters. Interested readers should refer to San Antonio’s Housing Policy Framework, which contains an accessible and thorough description of the local supply/demand mismatch.

While the short-term market impacts of COVID-19 are still unknown, these long-term trends are unlikely to change. Rents will continue to rise faster than wages since real wages are stagnating or even slightly declining for workers in low-wage jobs.²⁰ Furthermore, a large portion of the city’s employment opportunities are in low-wage jobs, and this trend is expected to continue. As explained in Opportunity at Risk: San Antonio’s Older Affordable Housing Stock²¹ “If the number of jobs in San Antonio grows at the national rate for the job categories currently in the city, there will be nearly 81,000 more workers ... 32,340 of those jobs — 40% of the total — will be in jobs that today pay less the \$30,000 per year.”

¹⁸ CoStar 2019 data includes multifamily rental buildings with at least 5 units.

¹⁹ Based on HUD FY 2020 Income Limits for the San Antonio-New Braunfels Metro FMR Area: <https://www.huduser.gov/portal/datasets/il/il2020/2020summary.odn>

²⁰ Between 1980 and 2015, wages for the bottom earning 10th percentile of full-time wage and salary workers in San Antonio fell by 2.6%.

²¹ PlaceEconomics, 2019. Report prepared for the San Antonio Office of Historic Preservation.

Regulated Affordable Housing

Publicly supported and regulated affordable housing is also at risk. Rental properties built with public funds typically have a required period of affordability ranging from 15 to 45 years. When the affordability period ends, property owners are free to increase rents to market rates. In San Antonio, 13,651 units of regulated affordable housing have an unknown age-out date. For these buildings, the public funder - COSA, TDHCA or HUD, lack documentation of when the building will be legally allowed to convert to market rate. Of the affordable developments with documented expiration dates, 2,917 will age out in the next four years by 2025 (table below).²² Stronger and better coordinated tracking systems are needed.

Not every regulated property that reaches the end of its affordability period is converted to market rate. However, research shows it is more likely when the units are owned by a for-profit owner, and when they are located in a high-rent neighborhood.²³

Properties owned by nonprofit and public sector entities are not free from the risk of conversion to market rate either. Sometimes even these owners must raise the rent (or sell the property to a for-profit entity, which then raises the rent). This typically happens when the “affordable” rents they charge produce less revenue than they need to maintain or finance the rehabilitation of a property. Sometimes the sale of a property to a for-profit entity is needed to fund mission-driven work elsewhere.

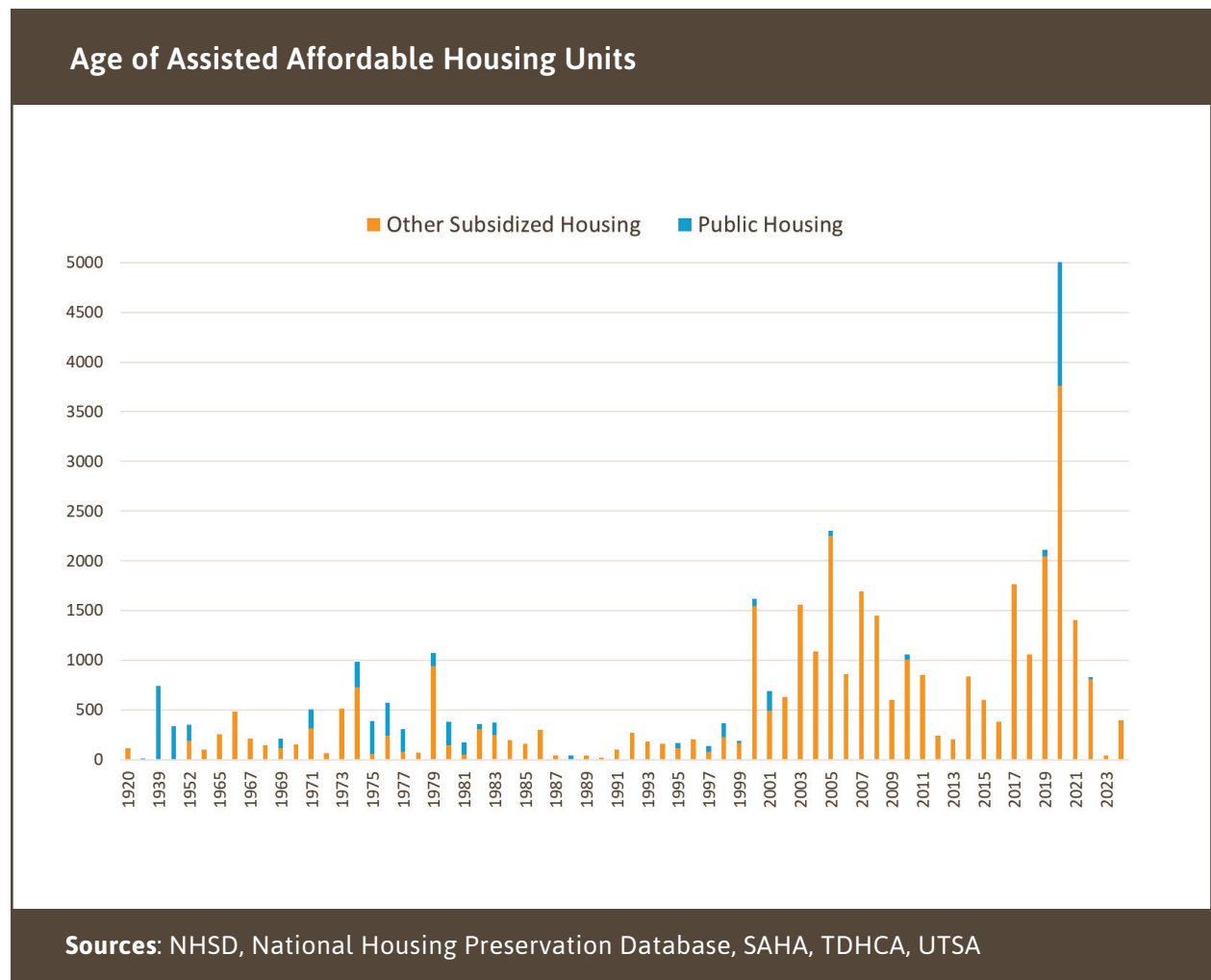
Affordability Expiration Dates for Regulated Affordable Housing*		
	Properties	Units
Age out 2012-2024	55	2,917
Age out 2025-2029	15	1,085
Age out 2030-2034	43	7,223
Affordability secured beyond 2034	86	12,157
Unknown age out date	120	13,651

*All known units serving up to 80% of AMI included in table. Exact required rental pricing varies.

²² Data on subsidized units aggregated by Grounded Solutions Network from multiple sources: NHSD, National Housing Preservation Database, SAHA, TDHCA. In subsidized units, the maximum allowable income level for the unit does not always reflect the actual rent level for a specific tenant. In some cases, most notably in public housing properties, the income level of tenants as well as their rent calculations might be lower than the maximum allowable.

²³ Abt Associates. (2012). What happens to Low Income Housing Tax Credit Properties at Year 15 and Beyond? U.S. Department of Housing and Urban Development. https://www.huduser.gov/portal/publications/hsgfin/lihtc_report2012.html

Rent increases are not the only risk to existing affordable rentals. Aging buildings with energy-inefficient construction and significant maintenance needs will become uninhabitable without rehabilitation. These buildings need re-investment to remain safe. In many cases, properties that charge affordable rents cannot rely on those rents to cover the costs of such re-investment. Subsidy is needed, from other sources, to upgrade plumbing and electrical systems, insulation, roofs, foundations, and address other issues. Public housing is a good example of this kind of challenge, since rents are so low (average rents are less than \$200) and HUD does not provide enough subsidy to fully address capital needs. The table below shows the age of the subsidized affordable housing units in San Antonio. About 2,000 units were built before 1980. Typically buildings need new investments in maintenance and capital improvements at least every 15 years, but few older buildings have been able to keep up with such maintenance needs.



Current Interventions

The term “preservation” when used in this report refers to preserving the affordability and the physical integrity of existing rentals – both multifamily apartments and single-family homes. It is distinct from historic preservation, which seeks to preserve historically and culturally significant neighborhood assets. TDHCA, NHSD, the Office of Urban Redevelopment (OUR SA), SAHA and SAHT all make investments in preserving the quality and affordability of regulated affordable housing. For instance, last year Wurzbach Manor, a 160-unit building originally built in 2002, received a new investment of 4% tax credits from TDHCA to upgrade the property and keep rent levels low. This was supported by a letter from the city and partnership with the SAHT. In the past few years, SAHT has partnered on five large preservation projects, securing 824 affordable housing units.

Public housing preservation is funded on an annual basis by HUD. Over the last five years, HUD has provided on average \$10.8 million per year for capital projects -- about 2% of \$523 million in identified capital needs. SAHA uses a five-year capital plan to manage the timing of specific preservation projects.

Some publicly supported preservation projects have short affordability covenants, such as the extensive rehabilitations led by the OUR SA, which only remain affordable for five years. Since each source of public subsidy has specific rules, a change in funding source may change the range of incomes considered eligible for a project, as well as the rents charged. In some cases -- especially in larger projects -- the reconfiguration of buildings, lots, and streets makes it challenging to replace all units onsite at equivalent or lower income targets. In these cases, a discussion of creating or preserving equivalent units offsite becomes necessary.

In terms of smaller scale apartment buildings and privately owned homes, the City of San Antonio’s Green and Healthy Homes (SAGHH) program provides assistance to owners and landlords to correct hazards like lead-based paint, household asthma triggers and fire hazards. The program provides between \$10,000 and \$45,000 per home in exchange for 15 years of affordability. Owners must have clear title to property and occupants must earn 80% of AMI or below.

The city is also considering a pilot to preserve affordable shotgun-style homes; there are about 500 of these units in San Antonio.



a. Action: Dedicate staff to convene & support a Housing Preservation Network.
Implementation Timing: Medium Term (2-3 years)

Leads: Neighborhood and Housing Services Department (NHSD)

Supporting Entities: San Antonio Housing Authority (SAHA), San Antonio Housing Trust (SAHT), University of Texas at San Antonio (UTSA), Local Initiatives Support Corporation (LISC), Texas Department of Housing and Community Development (TDHCA), Community Housing Development Organizations (CHDO’s), US Department of Housing and Urban Development (HUD) San Antonio Field Office, Tenant Advocates (e.g. Texas Rio Grande Legal Aid).

A Preservation Network unites the expertise and resources of local governments, state organizations, federal agencies and the nonprofit sector to preserve affordable rental housing stock.²⁴ A specific organization or entity receives funding to staff meetings, projects, and data-sharing efforts of the Network. This designated host brings together investors, owners, developers and tenants for building-specific as well as policy-level interventions. In San Antonio, the Housing Preservation Network may make sense as a sub-committee or working group of Housing Commission.

The initial tasks of the Preservation Network would be to create a complete database of subsidized properties in San Antonio with accurate expiration dates. Currently over 13,000 affordable housing units in San Antonio have unknown age-out dates. Second, the Preservation Network would focus on intervening in properties at high risk for exiting affordability or falling into severe disrepair. Typically, this type of targeted problem-solving and to rescue urgently at-risk subsidized buildings is the initial and most central role of a Preservation Network. As the network becomes fully established, it can turn its focus toward other preservation issues, including unregulated affordable housing (NOAH preservation). Over the long run, the Preservation Network would be charged with:

- ▶ Establishing and maintaining a database of subsidized properties, their owners, affordability periods, terms of affordability and other relevant details.²⁵
- ▶ Establishing a similar database for unsubsidized but affordable properties in the city.
- ▶ Determining which properties (whether subsidized or unsubsidized) are most at risk of loss and preserving them.
- ▶ Conducting a collaborative effort to engage tenants, owners, community organizations, government officials and financial institutions in affordable housing preservation efforts. For example, implementing a preservation track at the Mayor’s Housing Summit.
- ▶ Exploring the establishment of a sustainable Preservation Loan Fund with financial products specifically designed to support preservation.
- ▶ Providing training and technical assistance to support affordable housing preservation efforts.

Similar efforts have been established in other cities and states around the country. Some of the most prominent efforts include the Cook County Preservation Compact, Denver’s Affordable Housing Preservation Network, and The Ohio Preservation Compact.

Model: Cook County Preservation Compact

The Preservation Network in the Chicago area has facilitated preservation of 6,200 affordable units; 26,900 units were retrofitted with energy-saving features. Their work was instrumental in lowering assessment levels for multifamily rental properties, resulting in a 15% property tax reduction.

²⁴ Enterprise Community Partners

²⁵ TDHCA, NHSD and researchers at the University of Texas Law Center have made great strides in identifying at-risk regulated affordable housing. Grounded Solutions combined and deduplicated their respective data files, so the foundation exists for a comprehensive and regularly updated list of local affordable housing.



b. **Action:** Pass ordinance requiring 18-months notice for currently subsidized, regulated affordable housing developments that intend to convert to market rate or target a higher-income group.

Implementation timing: Short Term (1-2 years)

Leads: City Council, Mayor's Office

Supporting Entities: Neighborhood and Housing Services Department (NHSD), City Manager's Office, Bexar County, Development Services Department (DSD), Economic Development Department, Center City Development Office (CCDO)

Federal law requires landlords terminating a Project-Based Section 8 contract — and LIHTC properties 14 years of age — to give one-year notice to their funders at HUD or the State Housing Finance agency before they exit affordability. Many states and localities enhance these existing federal laws that require notice when an affordable housing restriction is expiring. Some local laws also include a first right to purchase or a first right of refusal.

Given that the city and state do not have complete data on the expiration dates of existing affordability covenants, a notice requirement is the key to ensuring that no large affordable buildings “slip through the cracks.” Notice should be provided to all tenants, city council members, the mayor's office, and the city's Neighborhood and Housing Services Department. According to legal experts, a San Antonio-specific notice requirement for all existing buildings would be on strong legal ground, whereas a first right of refusal for the local government may be met with legal challenges.

When an owner no longer wants to operate a subsidized affordable building, and they have come to the end of their legally required term of affordability, it is their right to get out of the business. Typically, this occurs by selling to a developer who will renovate the building for higher-income tenants. That said, current owners are often willing to sell to any buyer, as long as they receive a competitive market price. Unfortunately, when buildings go on the market, it is difficult for the city or an affordable housing developer to compete. It often takes over a year to put together partnerships and financing.

Other affordable housing owners may seek to refinance with public funds, upgrade their property, and raise rents to higher, but still regulated, levels. Refinancing and increasing rents can be a financially feasible path to preserving the physical integrity of a development when resources are short. In their 2020 asset management plan, SAHA proposes to sell some properties and increase rent levels on others to finance upgrades and new development. Properties owned by SAHA should go through the notice process, and the city should work collaboratively to prioritize affordability preservation or one-for-one replacement of deeply affordable units onsite or elsewhere.

²⁶ This recommendation was strengthened by the best-practices research of Aliaquanda Derrick and Mary Dear in their report *Preserving Austin's Multifamily Rental Housing A Toolkit*.

Model: Maryland requires a one- to two-year notice to tenant association, local jurisdiction and the state. State law sets up a mechanism for appraising the property and grants right of first refusal for the local housing authority, groups representing tenants and nonprofits. Owners are also required to submit a detailed tenant impact statement to the state.²⁷



c. Action: Initiate and fund diverse pilot projects to preserve the affordability and quality of unregulated low-priced rentals (“NOAH”).

Implementation Timing: Short Term (1-2 years)

Leads: San Antonio Housing Trust (SAHT), Neighborhood and Housing Services Department (NHSD), San Antonio Housing Authority (SAHA)

Supporting Entities: Affordable Housing Developers, Local Initiatives Support Corporation (LISC), National Association of Latino Asset Builders (NALCAB), US Department of Housing and Urban Development (HUD) San Antonio Field Office, Economic Development Department

This action could occur under the leadership of the Housing Preservation Network referenced above, or in parallel with its formation. The Preservation Network may take time to become established, but since loss of affordability is imminent in some cases, interventions cannot wait.

San Antonio is home to a diverse array of unregulated affordable rental properties. As of 2014, the most recent data available, there were approximately 10,000 apartments in two-four unit buildings and 27,000 single-family homes offered for rent at prices affordable to households earning 50% of AMI. This represents about one-third of all rentals in small buildings and single family homes. Data on large apartment buildings are more recent. In 2019, there were just over 23,000 (13%) units in larger apartment buildings affordable to households earning 50% of AMI. Landlord priorities and styles are as diverse as building typologies. Thus, there is no one-size-fits-all strategy for acquiring, rehabilitating or stabilizing rents in these properties.

Acquisition/rehabilitation projects are the best way to protect affordability and neighborhood integrity for the long term. In the acquisition/rehabilitation process, an affordable housing developer, supported by public and private investors, purchases and upgrades an existing building.

There are two underlying local conditions that serve as key prerequisites for successful preservation of this type. The first is developer infrastructure. NOAH preservation requires a different skill set and

²⁷ <https://law.utexas.edu/wp-content/uploads/sites/11/2015/11/2007-04-ECDC-Toolkit-Preserving-Multifamily-Housing.pdf>

different systems than construction of new affordable housing, or even the preservation of regulated affordable housing. Most developers in the San Antonio region have focused their work on new construction and/or preservation of regulated affordable housing.

The second key prerequisite is money — for acquisition, rehabilitation and to ensure rents can remain affordable to low-income households for the long term. The jurisdictions around the country that are having the most success preserving NOAH (including Minneapolis and Washington, DC) are successful in large part because the local public entities are committed to, and investing significant resources in, NOAH preservation. There are a variety of mission-driven developers and investors who would support this important work in San Antonio if the City of San Antonio, SAHA and SAHT come together in shared commitment. Supporting experts and investors from around the country might include Preservation of Affordable Housing (POAH), Housing Partnership Equity Trust (HPET), Local Initiative Support Center (LISC) Affordable Central Texas (ACT) and the National Association of Latino Asset Builders (NALCAB). Pilot projects targeting specific buildings will strengthen local developer capacity as well as local experience financing acquisition/rehabilitation projects.

Demonstration pilots should prioritize the following:

- ▶ Preventing displacement
- ▶ Innovation to preserve small apartment buildings and single-family homes
- ▶ Retention of existing tenants and rent levels for occupied units
- ▶ Inclusion of and direction from tenants in pilot development
- ▶ Affordability at or below 50% of AMI for unoccupied units
- ▶ Lasting affordability covenants
- ▶ Prioritization and capacity building resources for interested CCDO's
- ▶ Nonprofit or coop ownership

Model: The Urban Land Conservancy's (ULC) Metro Denver Impact Facility (MDIF) serves as an example of this approach. According to their website, "As the sole borrower of the MDIF, ULC has a proven track record of creating, fully expending and fully paying back two revolving loan funds for the purpose of stewardship and the development of beneficial real estate. ULC's investments in the \$15 million Transit Oriented Development Fund and the \$10 million Calvert Facility Fund resulted in 12 acquisitions that preserved and created hundreds of units of affordable rental housing and hundreds of thousands of square feet of affordable commercial space. The permanent affordability of these real estate developments significantly limited the displacement of local residents and nonprofits in Denver."



d. **Action:** Lengthen affordability terms to ensure lasting affordability for rental units with significant new local investment.

Implementation Timing: Short Term (1-2 years)

Lead: City Council, Mayor's Office

Supporting Entities: Neighborhood and Housing Services Department (NHSD), San Antonio Housing Trust (SAHT), San Antonio Housing Authority (SAHA)

In the next 15 years, at least 11,000 publicly supported affordable housing units in San Antonio will be allowed to raise rents and evict low-income families who cannot pay. The Preservation Network's mission will be to stop this from happening, but to do so will require additional incentives for developers and investments in the buildings to "buy" a longer term of affordability. (See recommendation above: Dedicate staff to convene and support a Housing Preservation Network.)

When buildings are losing affordability as quickly as new investments are made, the city can't see a net increase in affordable units. The solution is to require long affordability terms. Concerns about resource limitations, development feasibility and simple historical norms are leading the city, UDA, SAHT and SAHA to create a future preservation problem by subsidizing new apartments that have limited terms of affordability. Long terms of affordability sometimes require a larger up-front investment, but they save public dollars —and prevent displacement — down the line.

The City of San Antonio invests in affordable housing development with many different types of incentives, including city fee waivers, tax rebates, tax increment reinvestment zones (TIRZs), San Antonio Water System (SAWS) fee waivers, Public Facility Corporation (PFC) bonds, Public Facility Corporation (PFC) tax exemptions, Community Development Block Grant (CDBG) funds, and federal LIHTC allocations. As a condition of providing city approval or any other significant benefit to affordable housing development proposals, the City of San Antonio should require developers to commit to lasting terms of affordability -- periods long enough to ensure that several generations of San Antonians see the affordability benefits of the City's investment. In many cities, affordability terms may be as long as 99 years, or for the life of the building. This simple action will begin to get the city off the "hamster wheel": losing affordable housing units as quickly as they are created. A next step toward implementation of this recommendation will be to define "significant" levels of public investment, as some minimal benefits – such as fee waivers alone- may not warrant extended affordability requirements.



e. Action: Maximize deep affordability and minimize public financing gap for 30% of AMI and below.

Implementation Timing: Medium Term (2-3 years)

Lead: San Antonio Housing Authority (SAHA)

Supporting Entities: City Manager's Office, Neighborhood and Housing Services Department (NHSD), Housing Authority of Bexar County (HABC)

As explained in the Housing Policy Framework, the supply/demand mismatch in San Antonio is most severe for households 0-30% of AMI. Information about applicants to the Emergency Housing Assistance Program (EHAP), which provides back-rent and other emergency funds to those affected by COVID-19, shows that 0-30% AMI families are also most likely to be displaced. 59% of EHAP applicants were under 30% AMI, even though families up to 80% AMI qualify²⁸. As of 2016, there was a gap in supply of 32,000 units for households in this income group. According to Grounded Solutions data analysis, this gap has grown to at least 40,000 units. Except for public housing and housing choice vouchers, there are really no affordable options for these 55,000 very low-income families and individuals. Only 1% of the regulated affordable housing stock targets 30% of AMI or below, and less than .2% of San Antonio's unregulated rental units are affordable at this income level.

Unfortunately, reversing this trend is difficult. Development of new housing to serve extremely low-income households requires more public subsidy up front, and it also often requires an ongoing operating subsidy like Project-Based Section 8. In the current federal policy environment, there is far too little money available to build, at scale, what communities need.

Because newly financing deeply affordable housing is so challenging, all partners in San Antonio must work in a coordinated fashion to retain existing units and federal subsidies that allow for deep affordability. Whether they are administered by SAHA, the Housing Authority of Bexar County, or the regional HUD office, the city must identify all HAP contracts and units that serve 0-30% of AMI. Working with these partners, as well as national entities like the Corporation for Supportive Housing, the city can maximize federal resources for deep affordability. The City can leverage federal and state programs with local ones, such as TIRZ and neighborhood bond projects. Additionally, project-specific assistance can be made available in the form of fee waivers, zoning and other regulatory relief. One-for-one replacement is discussed in the final section of this report. In addition to one-for-one replacement of demolished units at the pre-existing affordability level, the City of San Antonio should set achievable development goals for NOAH preservation of units designated for families below 50% AMI.

²⁸ For current figures, updated in real time, see: <https://dhs.mendixcloud.com/p/dashboard/area-median-income-table>





f. Action: Identify ways to incentivize or reward landlords who don't have a history of evictions or code violations.

Implementation Timing: Long Term (3-5 years)

Lead: Center City Development and Operations (CCDO)

Supporting Entities: Neighborhood and Housing Services Department (NHSD), San Antonio Housing Trust (SAHT), Finance Department, Office of the Tax Assessor-Collector, Bexar County Appraisal District (BCAD), Bexar County Hospital District, School Districts Local Initiatives Support Corporation (LISC)

Multifamily landlords have been disproportionately impacted by property tax increases. Between 2015 and 2019, landlords saw their property taxes increase by about 43%, which is even more than owners of single family homes (table below).

Estimated Taxes on Median Value Property			
	2015	2019	% Change
Single-Family Residential	\$ 3,658	\$ 4,956	35%
Multi-Family Residential	\$ 38,430	\$ 54,805	43%

Sources: Bexar County Appraisal District, Office of the Tax Assessor/Recorder, Grounded Solutions Network²⁹

In the 2019 legislative session, comprehensive property tax reforms were implemented to slow the rate of future tax increases. However, these sweeping changes further stretch local budgets without specifically targeting property owners most in need.

Most improvements to the current property tax system requires changes to state law. In the absence of state legislation, there may be modest, partial solutions that can be implemented locally. A short-term working group should be convened to identify financial relief opportunities for small landlords and owners of regulated affordable housing.

For instance, NHSD can lead research and ideation on how to leverage tax increment reinvestment zones (TIRZs), neighborhood empowerment zones (NEZs), and Homestead Preservation Districts (HPDs) to reduce taxes. HPDs may be more effective than NEZs, but they will require a change to state law. TIRZ districts yield larger benefits with the cooperation from other taxing entities, so collaboration with the county will be important.

²⁹ Tax rates reflect those in the San Antonio Independent School District. Only properties that matched between 2014 and 2019 were used in order to estimate increases in taxes experienced by property owners in place for the full period.



Model: Minneapolis' 4d Affordable Housing Incentive Program provides apartment building owners with property tax reductions if they agree to keep 20% or more of their rental units affordable to households who earn up to 60% of AMI.



g. Action: Advocate for targeted property tax reductions for small landlords and regulated affordable housing (with legally enforceable rental price restrictions) serving 60% of AMI and below households.

Implementation Timing: Medium Term (2-3 years)

Lead: Government and Public Affairs Office

Supporting Entities: Neighborhood and Housing Services Department (NHSD)

Currently under state law, no-cost transitional housing for indigent individuals may be exempted by the taxing units. This should be broadened to apply to all regulated affordable housing and made an entitlement, similar to the exemption for qualified nonprofits. This change would not only improve the financial sustainability of existing regulated affordable housing and small landlords, but it would also create an incentive for NOAH landlords to enter into long-term affordability restrictions.



h. Action: Increase home repair and rehab loan or grant programs to qualified landlords in exchange for rent stabilization.

Implementation Timing: Long Term (3-5 years)

Leads: City Manager's Office, Neighborhood and Housing Services Department (NHSD)

Supporting Entities: Development Services Department (DSD)

Opportunity At Risk: San Antonio's Older Affordable Housing Stock³⁰ showed that every week for the last 10 years, San Antonio has lost more than three units of pre-1960 housing due to demolitions, and that more than 83% of razed housing units were rental properties. These demolitions represent a missed opportunity to retain affordable rental opportunities in the city.

³⁰ PlaceEconomics, 2019. Report prepared for the San Antonio Office of Historic Preservation.

There is evidence that small landlords who own one or two properties as investments rather than a sole means of income are more likely to be local, to know their tenants personally, and to be flexible in working with tenants during hard times. Certainly, this is not uniformly true of small landlords nor uniformly untrue of larger ones. However, targeting small NOAH landlords could be advantageous for the city. Working with small local landlords would support local businesses, local jobs and local wealth-building, while building citywide climate readiness and protecting affordable rental housing.

Affordability terms should correspond with the value of public investment instead of being limited to five years, as they are now. A landlord focus group revealed that large rehab loans with longer-term price restrictions would be possible as long as there is an early repayment option for landlords who want to sell the building unencumbered. Rehab loans that don't require long-term affordable pricing will not substantially build San Antonio's inventory of affordably priced dwellings, but can stabilize housing for tenants in the near term. For instance, landlords who meet qualifications (e.g. own less than five properties, live locally, offer units for rent that are affordable to tenants earning less than 50% of AMI, do not owe any outstanding debts to the city, and are current on their taxes) might be able to access funds under NHSD's Let's Paint and Under 1 Roof programs. These rehab programs will need additional funds to support the new purpose.

Model: The Small Buildings Program in Washington, DC, provides funds for limited systems replacement and other key repairs to property owners of five- to 20-unit buildings if they agree to keep at least 50% of units affordable to households who earn up to 80% of Median Family Income (MFI). The City of Milwaukee also has a forgivable loan program for qualified landlords.

The Challenge: San Antonio's manufactured home parks (mobile home parks) are closing.

Two reports present data and recommendations on halting mobile home displacement. Marisol Cortez, PhD, documented the story of Mission Trails, the first known large mobile home park to be removed for high-end development, in her 2017 report, "Making Displacement Visible: A Case Study Analysis of the 'Mission Trail of Tears'". This report includes policy recommendations created in partnership with former residents. A 2020 report from the University of Texas School of Law, "Endangered: San Antonio's Vanishing Mobile Home Parks and a Path for Preservation," contains both detailed data on trends and policy recommendations.

The information and recommendations in this ForEveryoneHome report build directly on the work of these scholars, and we do not attempt to duplicate those descriptions and analyses. Readers seeking deeper information on the topic should refer to those reports. We also recommend concerned stakeholders, including NHSD and DSD, reevaluate alongside the original authors and stakeholders for potential implementation of the complete set of recommendations in those prior works. We selected, here, a few promising recommendations to highlight.

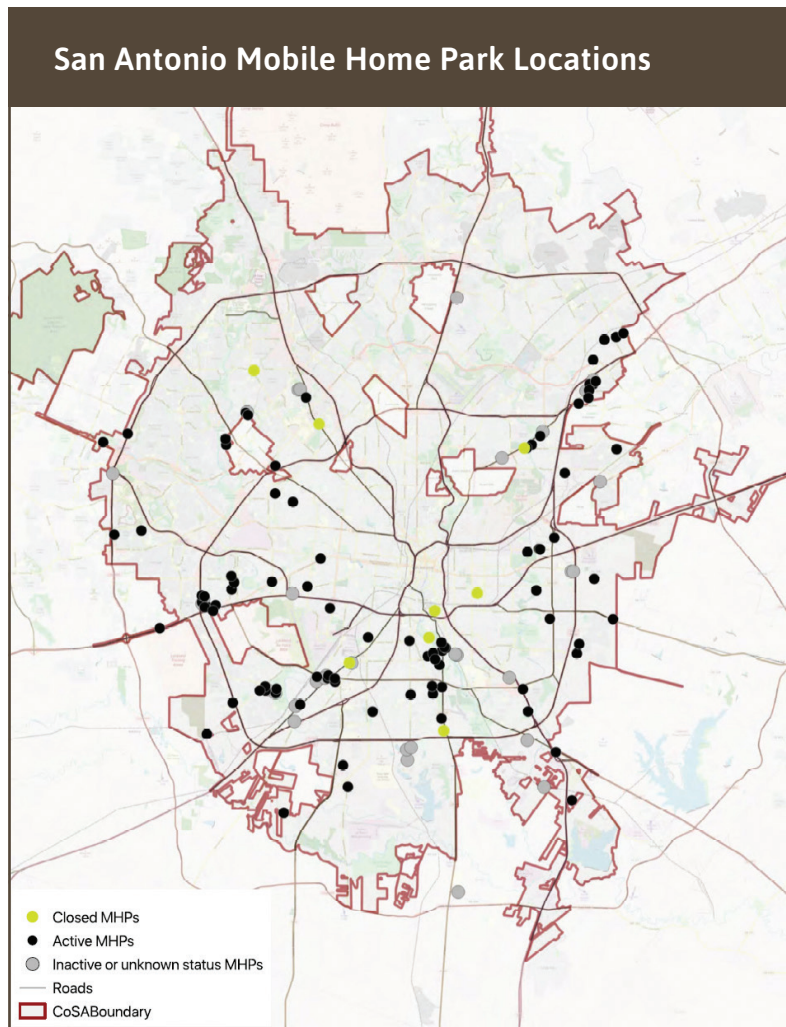
Nine mobile home parks have closed over the past six years, in San Antonio, displacing hundreds of residents. If the experience of other cities applies, San Antonio is on the brink of many more losses. As housing prices and developable land prices rise, selling land for redevelopment will increasingly be a logical choice for mobile home park owners. Closures will displace thousands of families and eradicate one of the few homeownership options for households earning below 50% of AMI.

Most individuals who live in manufactured housing own their unit and rent the land under it, so they lack some of the property rights or financial protections conferred by traditional homeownership. That said, in some respects, mobile home owners are not as vulnerable to rent increases as traditional renters — they own their unit, and mobile home park rents are not rising as quickly as conventional rents. Furthermore, many hold a sense of responsibility, permanence and pride in their home like other homeowners. Buying a manufactured home or mobile home grants entry into homeownership at a much lower price. In San Antonio, the average appraised value of existing mobile homes on rented land in 2019 was just \$17,950.³¹

San Antonio has an opportunity to largely prevent the loss of thousands of these homes by putting incentives and barriers in place now to reduce mobile home park conversions. Per the University of Texas School of Law report, approximately 22,000 people live in 8,000 manufactured homes in San Antonio. There are 89 active mobile home parks, widely varying in size. Many are in and near the city center and in locations that have rapidly rising land values and housing prices. A few interventions can secure these parks for long-term affordability and improve them to bolster neighborhood support.

³¹ BCAD data analyzed by Grounded Solutions Network

Rising land and housing prices are not the sole reason for mobile home park closures. Stability for families and individuals who live in manufactured homes can be jeopardized due to gentrification forces or, conversely, disinvestment. Disinvestment occurs when a mobile home park is aging, poorly maintained or over capacity, resulting in code violations and unsafe conditions. It also occurs when a manufactured home itself is in disrepair. In a perfect world, those who own parks or mobile units would consistently invest their own resources to do repairs. In actuality, both park owners and unit owners sometimes have prohibitive income and resource limitations. Addressing disinvestment and disrepair would be inexpensive when compared to the cost of developing new affordable housing or re-housing displaced residents.



Current Interventions

The Development Services Department (DSD) launched a mobile home registry and proactive inspection program in February 2018. In the first 45 days of that program, five parks were shut down for life and safety hazards. Since that time, DSD has altered their approach to work more persistently, patiently and collaboratively with owners to ensure that there are no avoidable park closures. This strategy has greatly reduced code violations, and no parks have closed since 2018. DSD continues to proactively inspect all mobile home parks, provide required training to mobile home park owners, and build relationships to facilitate compliance.

NHSD plays a role in mobile home park closures by catalyzing outreach to residents alongside its partners. Texas RioGrande Legal Aide is contracted to do outreach, dispute resolution and legal representation for mobile home residents. The Society of St. Vincent De Paul, SAMMinistries, the Fair Housing Council also support residents and connect them to services, referrals and housing placements.



a. **Action:** Explore the creation of narrow zoning designations and work with property owners and City Council to rezone manufactured housing and mobile home parks. Put a moratorium on conversions until the rezoning process is complete.

Implementation Timing: Short Term (1-2 years)

Leads: Planning Commission, Zoning Commission, City Council, Planning Department, Development Services Department (DSD)

Supporting Entities: Removing Barriers Sub-Committee, Neighborhood and Housing Services Department (NHSD)

The city should explore creating a zoning designation exclusive to manufactured housing and mobile homes, and explore the benefits and drawbacks of including “tiny homes” to this designation as well. By rezoning all manufactured housing and mobile home parks to this new designation, City Council could limit the opportunity to convert the properties to other uses. Developers seeking such a conversion would be required to go through a rezoning process that will at least allow for more city scrutiny, community input and resident voice about whether closing the park is in the public interest.

Currently, mobile home parks are allowed to operate in places zoned for other uses. These mobile home parks have a formal exception or “non-conforming use” allowance. According to the Texas Anti-Displacement Toolkit, only 31% of the city’s 89 active mobile home parks (as of 2019) are protected under the city’s manufactured housing district zoning — the city’s zoning classification for mobile home parks. Close to 25% of mobile home parks are zoned as commercial, and another 25% are zoned as single-family or multifamily residential. San Antonio’s manufactured housing district zoning also still allows for single-family residential uses. (Part 3, P.20) The current Mobile Home Park (MHP) zoning designation is also not exclusive to this use, and allows, by right, a conversion to other types of housing. An exclusive zoning designation would bring protections for residents, benefits for current park owners, and possibilities for investors with a positive track record to open new parks.

Upon adopting code amendments, the City of San Antonio should rezone all known mobile home parks.

Although most of this section discussed mobile homes located in parks, many mobile homes rest permanently or temporarily on small, privately owned parcels or streets such as in single-family zoned neighborhoods. The primary threat to these homes is not conversion for redevelopment, but forced removal when they violate city zoning restrictions. Mobile homes, manufactured homes and accessory dwelling units are all affordable by design and provide increased residential density without displacement or dramatic changes to neighborhood character. The city’s Removing Barriers Committee has been refining a proposal to allow construction of accessory dwelling units under certain circumstances. As part of their efforts, this committee — with input from mobile home owners — could develop a fast process to legalize individual mobile homes on private land.

Finally, the City of San Antonio should proactively encourage manufactured housing as an important form of affordable homeownership by making it easier for new land to be rezoned as manufactured housing/mobile home park. Currently, mobile home park owners report that the process of winning neighborhood and DSD approval for a conditional-use permit is a major barrier to expanding parks or opening new ones.



Model: The City of Austin has successfully rezoned its mobile home parks. Examples of other mobile home zoning designations are provided in the Texas Anti-Displacement Toolkit.



b. Action: Fund outreach, education and case management support to mobile home residents.

Implementation Timing: Medium Term (2-3 years)

Leads: Neighborhood and Housing Services Department (NHSD) and Development Services Department (DSD)

Supporting Entities: Community-based organizations, tenant advocacy organizations

Mobile home occupants are some of the city's poorest homeowners, often facing barriers to health care, healthy food, employment and other prerequisites for upward mobility. Improving housing stability will require addressing more than the physical environment.

In addition to grant funding for community-based organizations to do outreach and case management, the city will need to create:

- ▶ A mobile home assistance single point of entry or "hotline" for tenants and owners.
- ▶ A short, simple brochure listing existing services and financial support most relevant to mobile home park tenants.
- ▶ An approval process for sanctioned service providers to legally go onsite, without express landlord permission, at privately owned mobile home parks.

Finally, the city must ensure that all tenant protections enhanced under the Eviction section of this report apply to mobile home park residents.



c. Action: Establish minimum habitability standards for mobile homes/ manufactured homes, and create funds to ensure their safety.

Implementation Timing: Medium Term (2-3 years)

Lead: Development Services Department (DSD), City Council

Supporting Entities: Neighborhood and Housing Services Department (NHSD)

When Code Enforcement Services inspects and cites mobile home park owners for code violations, those violations are sometimes the responsibility of individual mobile/manufactured home owners. Code enforcement officers and community advocates have noticed the need for improved housing health and habitability in mobile units. However, the current building code does not contain requirements specific to mobile or manufactured units, so there are no standards by which to measure “sufficient” habitability.

DSD is interested in establishing such standards, not to penalize those in violation, but to educate and provide financial support to mobile home owners who need it. Bexar County has established some such standards, as well as rehab assistance for mobile units. That program may be used as a starting point or model. Small grants for repairs could be administered through either DSD or NHSD. NHSD, which already manages other home repair programs, could simply amend an existing homeowner repair program. On the other hand, DSD officers, who already interact with homeowners, could use this type of fund to provide collaborative and supportive customer service for mobile home residents and communities. Most likely the funds would be administered directly to small businesses and nonprofit providers who are able to execute owner-occupied manufactured housing repairs.



d. Action: Pilot a forgivable loan program for mobile home park owners to address landscaping and sewer system integration.

Implementation Timing: Long Term (3-5 years)

Leads: City Manager’s Office, Development Services Department (DSD), City Council

Supporting Entities: Neighborhood and Housing Services Department (NHSD), San Antonio Water Services (SAWS)

Interviews and national trends indicate many mobile home parks are only modestly profitable. Most park owners cannot prioritize aesthetic “frills” like landscaping. One park owner suggested that the city could improve the quality of life for residents, improve neighborhood relations, destigmatize mobile home parks, and increase long-term climate resilience with small grants (e.g., \$5,000) to support landscaping. The loan program could be funded directly by the DSD Mobile Home Park Inspection program, which currently brings in more revenue (in the form of mandatory registration fees) than it expends in operations. Fees are \$35 per lot and have not increased in years.

This recommendation garnered support amongst the ForEveryoneHome team as a low-cost, high-impact intervention. To ensure park upgrades don't result in rent hikes, park owners would need to agree to some form of rent stabilization (e.g., no more than 2% increase per year) for their current tenants or for a limited period of time, such as five years.

Large investments, like loans to support connection to the city's water and sewer system, should also be explored. Owners do not always earn enough to afford major upgrades, such as transitioning from septic to sewer. In fact, the current proactive inspection program was created after a sewer system failure at Oak Hollow Park. At that time, the city bore significant costs in terms of relocation services and support due to this infrastructure failure.

Such public investments in preservation would improve the quality and environmental sustainability of mobile home parks. Furthermore, substantial financial support for capital improvements can come with longer affordability requirements (e.g., 40 years) as well as tenant protections, thereby building the long-term housing supply for a more equitable city.



e. **Action:** Launch a pilot program to convert one or more manufactured housing parks to tenant ownership.

Implementation Timing: Long Term (3-5 years)

Leads: City Council, San Antonio Housing Trust (SAHT), Neighborhood and Housing Services Department (NHSD)

Supporting Entities: ROC USA, community-based organizations

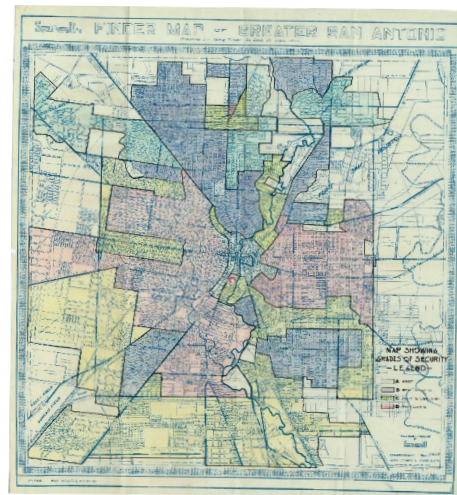
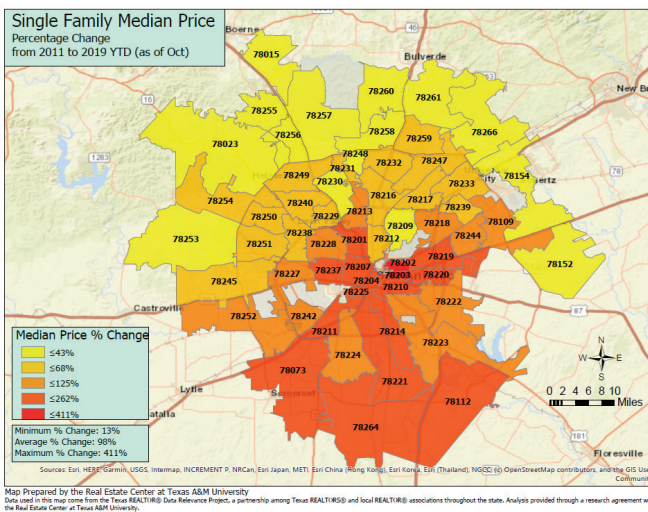
Resident Owned Communities (ROC) with permanent affordability is the gold standard for mobile home park preservation. ROC USA is a national organization that facilitates tenant purchase and protection of mobile home parks. Converting a park to tenant ownership is not simple; it requires expertise in tenant organizing, financial support for both acquisition and infrastructure investments in the park, and legal expertise for structuring ownership rights and responsibilities. Through our public outreach, we heard strong interest from community members in converting more of San Antonio's parks to tenant ownership. We recommend deepening a partnership with ROC USA for guidance in identifying likely nonprofit partners and parks to explore for a pilot. A pilot can build local capacity and knowledge about financing and creating sustainable ROCs, while protecting at least one of the most at-risk mobile home parks in the city.

Model: On June 1, 2020, the Asociación de Residentes North Lamar/ North Lamar Tenants Union purchased a 69-lot mobile home park with support from Community Housing Expansion of Austin, the City of Austin (which provided a \$2.5 million loan), BASTA Austin and ROC USA. The majority of residents are low income, making less than \$60,000 per year for a family of four.

The Challenge: Homeowners can't afford rising expenses.

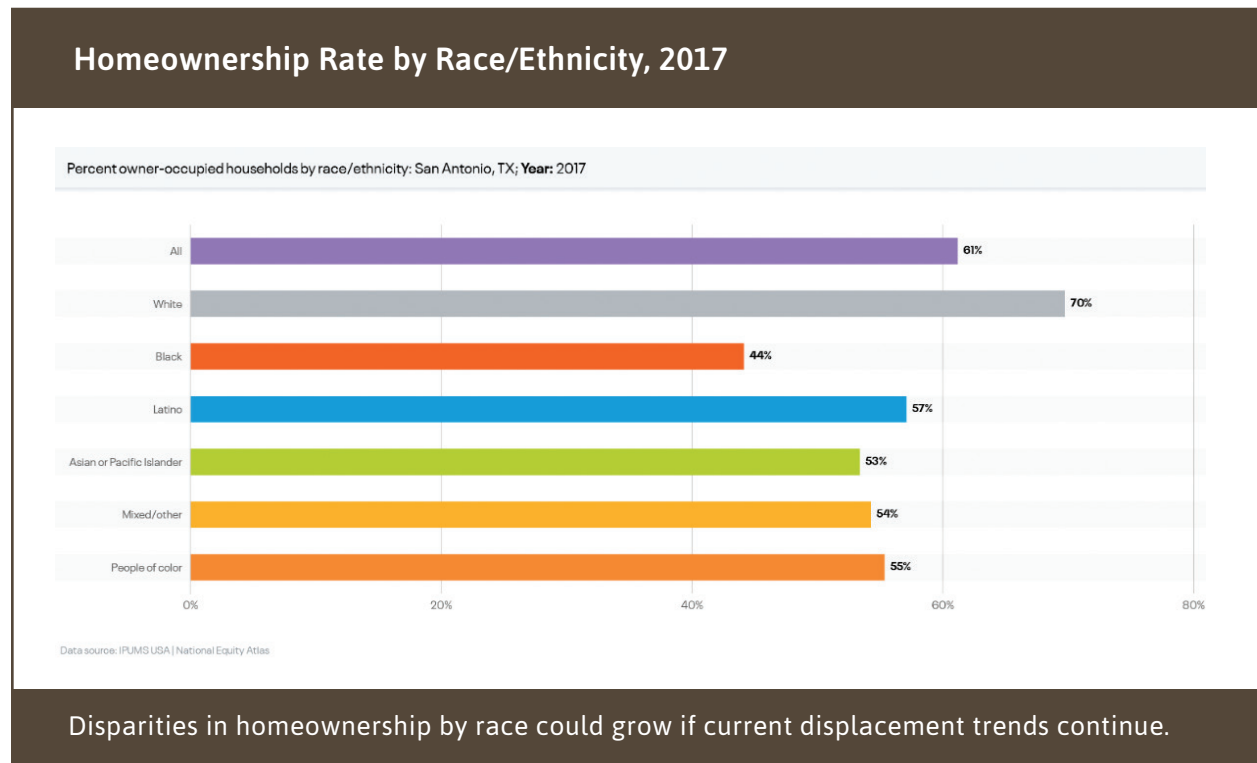
Areas of San Antonio where homes have been devalued by federal policies, disinvestment and systemic racism are now seeing the fastest rising prices. Home values and sale prices have skyrocketed in the past decade, particularly in neighborhoods surrounding and south of downtown — the historically redlined areas of the city. In fact, in the zip codes 78202 and 78203, home sale prices more than quadrupled between 2011 and 2019. As we will examine in this section, the geographic distribution of home flipping, code enforcement activity and foreclosure all track with price escalation. As a consequence, without intervention, San Antonio could see racial disparities in homeownership grow as homeowners of color are displaced by untenable ownership expenses and predatory homebuyers.

Rise in Median Home Price by Census Tract Beside Historic Redlining Map



Historically redlined neighborhoods (yellow and red colors in map on right) have seen some of the largest increases in home values (red and dark orange colors in map on left)

Homeownership is already enjoyed by a higher percentage of white households than households of color. White households enjoy a homeownership rate of about 70% in San Antonio, while Latinx households have a homeownership rate of about 57%, and Black households have a homeownership rate of only 44%.



Rising Property Taxes

For some owners, rising assessed values result in unaffordable tax bills. According to interviews and focus group conversations, property taxes are the single largest cost pressure facing low-income homeowners. Between 2015 and 2019, the average homeowner within the San Antonio Independent School District saw their property taxes rise by 35%, or about \$1,300. Furthermore, property taxes often fall disproportionately on lower-valued properties. Texas tax code’s “equal and uniform” clause (Texas Property Tax Code Section 42.26) prevents properties from being appraised very far above the median for comparable properties in the neighborhood. This means that in neighborhoods with diverse property values- such as San Antonio’s Eastside – high-value properties may be assessed below their market value to maintain “equal and uniform” assessments across the neighborhood. When this happens, lower valued homes effectively pay taxes at a higher rate than the most expensive ones.

Property taxes are based on home value assessments calculated by the Bexar County Appraisal District. Based on their estimated home value, residents pay property taxes for seven different taxing units, each of which sets its own tax rate and follows state law in setting exemptions. The most common exemptions

are for owner occupants, seniors 65 and older, and persons with disabilities. New exemptions generally require state enabling legislation. Senior homeowners have sizable tax exemptions but often heirs, not qualified for the senior exemption, are unable to pay the taxes on the family home.

Property taxes are critically important for local infrastructure like schools, roads and hospitals. Therefore, blanket tax rate reductions, which can legally be implemented by each taxing unit, would result in underfunding core services and infrastructure needed for the health of all San Antonians.

Because targeted tax abatements for low-income homeowners would violate state law, recommendations focus on state-level advocacy and equitable access to existing tax abatement programs.

2019 Official Tax Rates and Exemptions for Properties within San Antonio Independent School District Boundaries						
Name	Code	Tax Rate / \$100	Homestead	65 and Older	Disabled	Freeze Year
Road and Flood Control Fund	8	\$0.02	3,000	n/a	2,000	2005
Alamo Community College	9	\$0.15	n/a	30,000	5,000	2005
Hospital District	10	\$0.28	n/a	10,000	n/a	n/a
Bexar County	11	\$0.28	n/a	50,000	5,000	2005
San Antonio River Authority	19	\$0.02	5,000 or .5%	5,000	5,000	n/a
City of San Antonio	21	\$0.56	5,000 or .01%	65,000	12,500	2005
San Antonio ISD	57	\$1.53	25,000 and .01%	10,000	10,000	1997

Source: Website of the Tax Assessor-Collector³²

³² <https://www.bexar.org/3079/2019-Official-Tax-Rates-Exemptions>

Property Maintenance

Even while property values are rising, some of San Antonio's older homes are falling into disrepair. As documented in *Opportunity At Risk: San Antonio's Older Affordable Housing Stock*³³, 22% of all housing units in the city were constructed prior to 1960. About 30,000 of these properties are in poor condition and "lack maintenance and/or minor repairs".

Issues in aging homes can often be resolved with modest repairs. However, data show that these older homes are typically occupied by long-term residents who identify as Hispanic/Latinx and earn less than 60% of AMI³⁴. When unable to pay both property taxes and home repairs, households are forced to forgo maintenance.

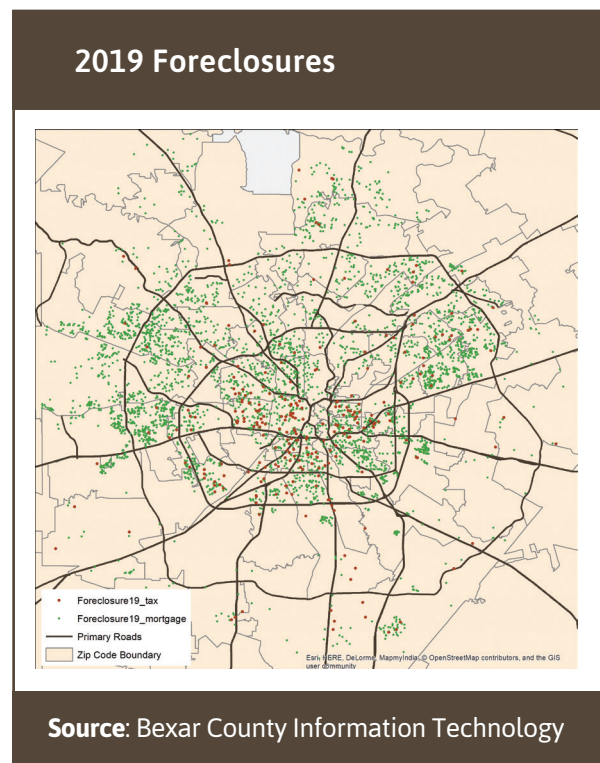
Mortgage Foreclosure

The map above shows the spatial pattern of mortgage foreclosure (green) and tax foreclosure (red) in Bexar County. The pattern shows concentrations of foreclosure in San Antonio's older core neighborhoods as well as in the far Northeast and far Northwest.

For new owners, rising purchase prices can lead to unaffordable monthly mortgage payments. However, new buyers are not the only ones who find themselves falling delinquent on payments, especially in this time of high unemployment. According to an experienced housing counselor, one common "profile" of a person entering foreclosure is a low-income, older, Latinx person who has owned their home for some time but just recently lost income.

From 2014 to 2019, mortgage foreclosure displaced over 5,000 families per year. With the exception of eviction, foreclosure is the largest displacement driver in San Antonio. Foreclosure was only slightly less common in 2019 than it was in 2009, near the peak of the foreclosure crisis.

Federal foreclosure moratoriums, significant short-term financial assistance, and flexibility on the part of conventional mortgage brokers have to date successfully forestalled a rise in foreclosure from households impacted by COVID-19. However, as moratoriums come to an end, foreclosure rates will likely creep up for families and individuals who remain unemployed or underemployed.



³³ PlaceEconomics, 2019. Report prepared for the San Antonio Office of Historic Preservation.

³⁴ Opportunity at Risk: San Antonio's Older Affordable Housing Stock, PlaceEconomics, 2019. Report prepared for the San Antonio Office of Historic Preservation.

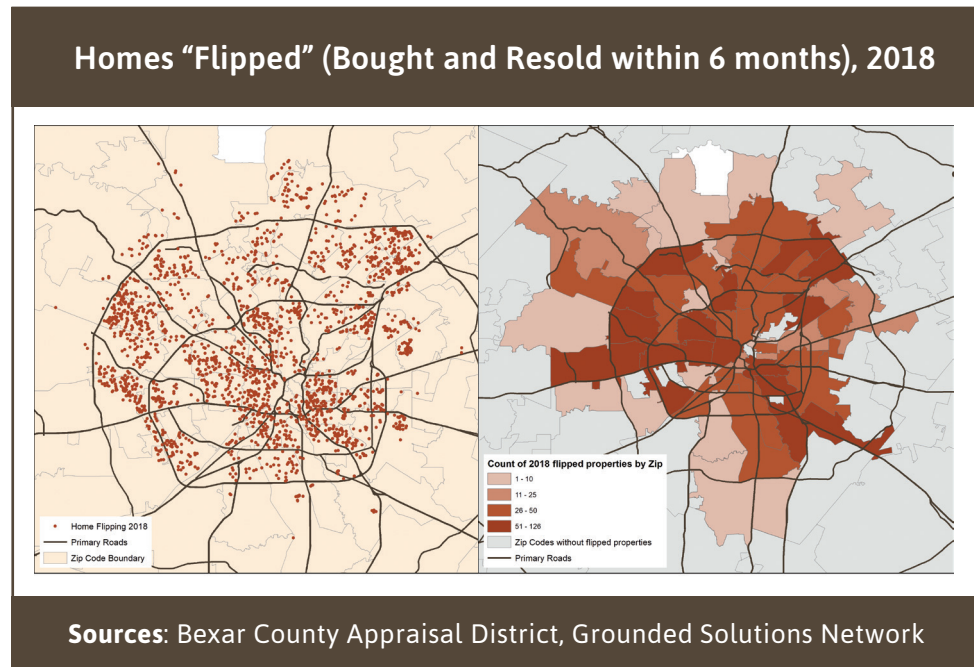
Predatory Home Buying

Unaffordable mortgages, property maintenance and rising taxes are all factors that can pressure a homeowner to reluctantly sell their home. Predatory home buying occurs when investors purchase properties below fair market value by targeting owners in a financial crisis. Buyers use strategies like persistent phone calls, texts and letters to persuade owners to accept offers far below a fair market price. Low-income owners with homes in disrepair, clouded title issues, no savings with which to renovate or stage the property, and urgent financial pressures are more likely to fall victim to predatory home buyers.

No data are available on the number of predatory purchases in San Antonio, so as a proxy, we examined home flipping, defined as buying and subsequently re-selling a home within a six-month period. Although not all home-flipping is nefarious, many cities broadly oppose it because it can be associated with predatory home-buying tactics, poorly executed repairs and price inflation.

In 2018, 2,143 homes in San Antonio changed hands twice within a six-month period. The maps below show the location of these homes. Home flipping is happening all over the city, but is most prevalent to the west, east and south of downtown, as well as near large military bases. In older Latinx communities that are newly gentrifying, predatory home-buying has at least two equity consequences: it strips wealth from legacy families who sell, and it accelerates property tax increases for remaining families.

In San Antonio, investigative reporting has revealed that predatory buyers are using public data on utility payments to identify and pressure families with financial hardships.³⁵ Grounded Solutions also analyzed data from BCAD and DSD and found that 13.5% of flipped homes in 2018 had at least one code violation within one year prior to the initial purchase. This lends credibility to community reports about the weaponization of code enforcement by unscrupulous developers, an issue that will be discussed later in this section.



³⁵ <https://sanantonioreport.org/real-estate-investors-target-sa-property-owners-who-have-had-water-shut-off/>

Total Homes Flipped 2015-2018			
2015	2016	2017	2018
2,057	2,091	1,995	2,143

Sources: Bexar County Appraisal District, Grounded Solutions Network

Current Policies/Programs

Maintenance and Repairs

Currently, the city manages three programs to help low-income homeowners (80% of AMI and below) maintain or upgrade their property:

- ▶ Under 1 Roof provides a grant of up to \$14,000 that is forgiven after five years of owner occupancy and property tax payments. In 2020, 300 households were served.
- ▶ The Owner-Occupied Rehab and Reconstruction Program (OOR) provides loans of at least \$5,000 and requires affordability from 10 to 20 years, depending upon the loan amount. In 2020, 65 households were served.
- ▶ The Minor Rehab Grant program provides up to \$25,000 and requires up to five years of owner occupancy. In 2020, 30 households were served.

The State’s Housing Trust Fund provides funding to the organization Terra-Genesis to administer home repairs for disabled and low-income individuals. The program is called Amy Young Barrier Removal program and funds home repairs valued up to \$20,250.

Merced Housing also makes health- and safety-related repairs for extremely low-income homeowners who make 30% or less of AMI. Merced has repaired more than 630 homes. Merced also runs a program to acquire and completely rehabilitate dilapidated houses or construct new infill homes in San Antonio for resale to individuals or families whose income is less than 80% of AMI. Merced has repaired and sold 22 homes.

Code Enforcement

The goal of Code Enforcement Services (CES), a division of the Development Services Department, is to address conditions that impact the health, safety and welfare of San Antonio residents. CES prioritizes the use of inspection and property data to drive the allocation of CES resources, including the assignment of nearly 150 CES inspectors and managers to specific geographic regions of San Antonio. CES is also working to shift resources to support more proactive enforcement aimed at addressing code violations before they become more dangerous to the community and more costly and difficult to address, as to opposed to simply responding to 311 calls and complaints. CES investigates between 75,000 and 90,000 code violations every year, and in most cases, reports meeting their own internal performance goals of achieving 90% compliance within 45 days of observing a violation.

Foreclosure Prevention

The Local Initiative Support Corporation (LISC) is helping staff at various local nonprofits become HUD-certified housing counselors who can help people avoid foreclosure once they fall delinquent on mortgage payments. NHSD's Fair Housing Division also has mortgage counselors on staff who, coupled with emergency assistance for mortgages, have helped many families avoid foreclosure. Some nonprofit service providers, including SAMMinistries, are also able to support homeowners in need with mortgage assistance.



a. Action: Strengthen outreach, information and counseling services for homeowners.

Implementation Timing: Short Term (1-2 years)

Lead: Neighborhood and Housing Services Department (NHSD)

Supporting Entities: Local Initiative Support Corporation (LISC), Development Services Department (DSD), Bexar County Appraisal District (BCAD), Office of the Assessor-Recorder, neighborhood and residents associations

Homeowners should know who to call when they might not be able to make their next mortgage payment or if they want information about tax abatements. One possibility would be a single point of entry that could direct all homeowners to other specialists. Homeowners in at-risk neighborhoods should be targeted with door-to-door outreach and mailings to keep them informed. Recommended tactics to strengthen outreach, information and counseling services include:

- ▶ Regular outreach to homeowners in at-risk neighborhoods about predatory homebuying, tax abatements, repair programs, title clearance, and financial education, and foreclosure counseling services.
- ▶ Short one- to two-page primers on each of the above topics, building off existing resources such as the Mi Barrio No Se Vende pamphlet.
- ▶ A single point of entry (phone number or organization) for homeownership questions and counseling.
- ▶ Homeowner advocates who are trained to provide answers to basic questions on a variety of topics, as well as connect homeowners to specialized services and support.
- ▶ A phone number for property owners to contact and report any attempts by private speculators to pressure owners to sell; include this number on all notices of violation.



b. Action: Advocate for state tax reform.

Implementation Timing: Long Term (3-5 years)

Lead: Government and Public Affairs Office

Supporting Entities: Neighborhood and Housing Services Department (NHSD), Finance Department, Local Initiative Support Corporation (LISC), Texas Housers

In 2019, the Texas Legislature passed several bills to limit property tax increases, but none were selective in providing relief specifically for low- and moderate-income homeowners. Recommendations from the San Antonio Finance Department to enhance equity within the existing property tax structure include:

- ▶ Allow taxing units (counties, cities, etc.) to cap their allowable homestead exemption. Current state law sets the maximum exemption to be 20% of the property value. Thus, higher value homes always receive a larger public benefit under the current homestead exemption structure.
- ▶ Require sales price disclosures. Because appraisal districts do not have access to actual market values, they must rely on neighborhood trends, which tend to undervalue high-worth properties and overvalue low-worth properties. This disproportionately benefits the owners of high-priced homes and commercial properties, while penalizing those in modest, aging homes.
- ▶ Support reintroduction of the Anchor Neighbor Bill to freeze property taxes for homeowners who have been in place for at least 10 years.



c. Action: Scale up estate planning and title clearance.

Implementation Timing: Short Term (1-2 years)

Leads: City Council, City Manager's Office, Mayor's Office

Supporting Entities: Neighborhood and Housing Services Department (NHSD), University of Texas at San Antonio (UTSA), Mexican American Unity Council (MAUC)

Currently, not all homeowners can access the tax exemptions for which they qualify. For instance, many homeowners in San Antonio cannot reap the benefits of the homestead exemption because they inherited a family home and are not listed on the title as the owner. Education, outreach, estate planning and clouded title clearance services would resolve this problem.

A University of Texas San Antonio (USTA) report states that “many homeowners in urban neighborhoods in Texas are reporting the discovery of title problems due to issues like multiple owners, tax liens, judgment liens and municipal liens...The vast majority of title clearance issues involve fractionalized ownership due to the death of a homeowner.”

A clouded or fractured title makes it difficult to access home repair loans and makes owners more vulnerable to predatory investors who promise to take care of paperwork and transaction fees for

the sale. Estate planning services prevent clouded title by helping elderly homeowners articulate the desired plan of succession for real estate on their passing in a will or trust document. The City contracted with UTSA to pilot a program that helped 93 families obtain legal ownership for themselves or their heirs by filing legal documents like an affidavit of heirship, a deed or a will. This program should be replicated and expanded to more neighborhoods. Staff of the program should collaborate with others doing outreach and education to homeowners on topics like predatory homebuyers, rehab/renovation options and tax abatement programs – which are discussed in the recommendation to Strengthen outreach, information and counseling services for homeowners and Empower homeowners with the knowledge and time they need to remedy code violations. Additionally, the pilot must cover filing fees or work with the county to waive recording fees for low-income residents. UTSA reports that some residents had difficulty paying filing fees to get the document recorded.



d. Action: Increase funding for pre-purchase and post-purchase homeowner counseling services.

Implementation Timing: Short Term (1-2 years)

Lead: City Manager's Office, City Council

Supporting Entities: Neighborhood and Housing Services Department (NHSD),
Local Initiatives Support Corporation (LISC)

Foreclosure can be reduced by both pre-purchase and post-purchase counseling. Pre-purchase counseling helps ensure fair and sustainable mortgage payments, teaches budgeting skills and warns against owner-financed purchases.

Post-purchase counseling deepens fiscal resilience, including financial recovery after a life-changing event or loss of income. Post-purchase counselors also guide communication with lenders for mortgage modifications, and they educate homeowners about the drawbacks of selling to all-cash buyers without a representative.

San Antonio currently has only one HUD-certified organization providing homeowner counseling (Neighborhood Housing Services, Inc.). LISC and several community-based organizations have identified this gap and are actively hiring more staff. Trained counselors will be indispensable if COVID-19 has continued impacts on local jobs.

Agencies that provide counseling services must also work together to track foreclosure trends. Besides NHSD, organizations including LISC, Bexar County, SAMMinistries, Neighborhood Housing Services, and St. Vincent De Paul provide short-term rental assistance and housing counseling services. They are likely partners for the city in preventing a new mortgage crisis. Closely tracking and discussing trends among clients seeking services will facilitate timely intervention if and when mortgage default rates increase due to COVID-19 economic impacts.



e. Action: Empower homeowners with the knowledge and time they need to remedy code violations.

Implementation Timing: Short and Medium Term (1-3 years)

Lead: Development Services Department (DSD)

Supporting Entities: Neighborhood and Housing Services Department (NHSD), neighborhood and residents associations

Property maintenance that is neglected, insufficient or contradictory to local zoning code triggers code enforcement action. The primary goal of code enforcement is to address conditions that impact the health and safety of San Antonio residents. However, the challenges facing San Antonio's lower-income communities of color where code enforcement is most prevalent are the result of decades of public and private disinvestment and the previous histories associated with racially discriminatory laws and land use policies, which disparately impacted communities of color. These challenges are exacerbated by the COVID-19 public health crisis and rapidly increasing housing market pressures in San Antonio. Code enforcement must prioritize equitable outcomes in these communities — like the preservation of housing for low-income homeowners or the availability of quality rentals in communities of color. If enforcement leads to displacement, it is not effectively protecting the health and safety of residents who live there today.

The resident leaders we interviewed raised concerns about the culture of code enforcement, the need for more education about property maintenance, and the lack of information about resources for struggling homeowners. Strengthening the relationship between code enforcement officers and the public is particularly difficult during the current health crisis. However, is it also likely that this health crisis will exacerbate financial pressures in lower-income communities of color, making action all the more urgent. Aggressive code enforcement fines, fees or criminal penalties in areas where owners are less able to afford repairs or basic maintenance could incentivize owners to sell to a speculative purchaser, or to simply walk away and eventually lose the property to foreclosure. We recommend the following changes to shift the perception of code enforcement and reduce unintended consequences for low-income homeowners:

1. Minimize punitive measures against homeowners.

- ▶ With the exception of violations that immediately threaten the health and safety of tenants or neighbors, the code enforcement's Neighborhood Enhancement Team should offer property owners up to 30 days to learn about and attempt to address violations before issuing a citation. The city's field enforcement units have already adopted this approach as an interim response during the pandemic.
- ▶ Eliminate the use of criminal penalties against low-income homeowners, noting that the threat of jail time and a possible criminal record may actually exacerbate the problem and possibly encourage displacement. Use of criminal penalties is already rare, but could be eliminated.

2. Empower homeowners with the knowledge they need to correct violations.

- ▶ Permanently adopt the use of the “Code Enforcement 101 Education Form” for occupied properties, and continually improve the form with input from residents.
- ▶ Create a one- to two-page flyer of all available public and private home repair grants, loans or other resources available to low-income homeowners or landlords. Provide with all code enforcement notices.
- ▶ Create a one- to two-page flyer of all available resources for renters who might be impacted by code enforcement. Post or hand-deliver resources for renters, as code enforcement notices go to the owner.

3. Improve communication between code enforcement officers, homeowners and the community.

- ▶ Train code enforcement inspectors and managers on customer service/interaction, implicit bias and racial equity.
- ▶ Bring back the [Neighborhood Sweep Program](#) or require each field unit to work with NHSD to host and sponsor a rotating cleanup or beautification day in their district at least twice a year.
- ▶ Increase transparency by creating a neighborhood “tracker” for code enforcement activity that lists the number of customers served and/or complaints responded to, including timelines. This is a way to display the city’s investment in health and safety and to increase accountability to equitable enforcement.



f. Action: Increase the availability and reach of programs to support simple maintenance, repairs and rehab for low-income homeowners.

Implementation Timing: Medium Term (2-3 years)

Lead: Development Services Department (DSD)

Supporting Entities: City Manager’s Office, Neighborhood and Housing Services Department (NHSD)

Programs to support low-income homeowners are too limited in scale. NHSD’s Owner-Occupied Rehabilitation and Reconstruction Program offers forgivable repair loans of up to \$100,000 per home. It is targeted to homeowners facing major repairs. The Minor Repair Program funds up to \$25,000 per home. Unfortunately, these programs will only reach about 90 homeowners in 2020 (~25 minor awards and ~65 major awards).

Given the challenges and costs of administering the funding program for major repairs, one option may be to increase the reach of the Minor Repair Program at the expense of a few homes in the major repair program to serve more homeowners in need. Another option may be to revise the Owner-Occupied Rehabilitation and Reconstruction Program for major repairs so that homeowners who have one code enforcement lien or outstanding judgements against the property qualify still for the program. Currently any code lien or outstanding judgment may disqualify the applicant. Code enforcement officers could become a referral source and would be better able to help homeowners with supports and incentives rather than the traditional punitive measures that code enforcement officers must now rely upon for compliance.

The city should also provide funding for the Compliance Assistance Fund. This fund is available for certain owners who cannot comply with the requirements of their citation from Code Enforcement Services. Unfortunately, the amount currently in the fund is just over \$15,000, which is enough to help three or so households. DSD should consider setting aside a percentage (e.g., 5%) of all liens, fines and fees collected by or on behalf of code enforcement to support the fund. If resources remain limited, households in historically redlined neighborhoods should be prioritized. The NHSD Equity Action Team is beginning to take a similar racial justice approach with other programs.

Finally, Code Enforcement Services already offers residents free access to a variety of tools through its Community Tool Shed program; these types of resource should be improved and expanded within DSD or in partnership with community-based organizations. In Battle Creek, Michigan, for instance, the city offers qualified residents free paint kits to paint their homes. Another example, the Porch Project in Flint, Michigan, is a nonprofit-led program that helps residents repair and beautify their porches.



g. Action: Establish a community land trust to create and preserve affordable homeownership.

Implementation Timing: Long Term (3-5 years)

Lead: Neighborhood and Housing Services Department (NHSD)

Supporting Entities: City Manager's Office, Mayor's Office, Office of Historic Preservation (OHP), San Antonio Housing Trust (SAHT)

Community land trusts (CLTs) are nonprofit organizations that provide lasting community assets and shared equity homeownership opportunities for families and communities. There are over 225 CLTs in the United States.

CLTs develop rural and urban agriculture projects, commercial spaces to serve local communities, affordable rental and cooperative housing projects, and conservation land or urban green spaces. However, the heart of a CLT's work is providing homeownership opportunities for generations of lower-income families. A CLT's shared equity homeownership model takes a one-time public investment to make a home affordable for a lower-income family, then restricts the home's sale price each time it is sold to keep it affordable for subsequent low-income families who purchase the home. The model balances wealth building for families who would otherwise be unable to afford owning a home with preserving the community's investment.

CLTs often enforce resale restrictions and lasting affordability terms by retaining ownership of the land. By separating ownership of the physical property and ownership of the land, a CLT can reduce property taxes for low-income owners.

One example is the City of Lakes Community Land Trust, which innovated a model called Project Sustained Legacy for keeping distressed homeowners in place. The organization takes over the deed to the land belonging to an existing homeowner, and in return addresses outstanding tax liens, mortgage payments and deferred maintenance. Once established, a CLT in San Antonio might play a similar foreclosure prevention role.

The Challenge: City investments and new development can increase displacement pressure.

The City has invested significantly in public improvements in recent years. One unfortunate side effect of making the city a better place is that it can indirectly contribute to higher housing costs. Researchers repeatedly find a link between public investment and increased home values. Infill development, public transportation, parks improvements, tax increment financing (TIF) districts and Community Development Block Grant investments all raise home values because surrounding areas become more attractive places to live.³⁶

The parts of San Antonio that have seen significant public investment in beautification, walkability and economic vitality are also some of the neighborhoods that have the fastest rising rents and home values. For instance:

- ▶ Areas near the Museum Reach Urban Segment of the San Antonio River saw land values go up by over 270% since 2009, when the San Antonio River Authority (SARA) began its \$72 million investment.
- ▶ \$1.5 billion of fee waivers and tax incentives flowed to downtown developers through Center City Development and Operations (CCDO) incentives between 2012 and 2018. Home prices adjacent to downtown rose over 400% between 2011 and 2019.
- ▶ \$271 million public investment in Mission Reach catalyzed 20 new developments and \$658 million in economic development investments, according to SARA.
- ▶ Per data analysis from the Office of Historic Preservation, older single-family properties near infill construction have seen a higher-than-average increase in their value.³⁷

Public investment, including CCDO incentives, bond-funded projects, San Antonio River Authority investments, and CDBG has been concentrated in downtown. NALCAB's 2018 Analysis of Housing Vulnerability examined the link between these investments, demographic changes and housing prices. They identified low-income census tracts near downtown with rapidly rising housing prices as well as demographic shifts that indicate displacement could be occurring- like increases in White residents, higher income residents, and college educated residents. Everyone should benefit

³⁶ ① Galster, Walker, Hayes, Boxall, and Johnson, Measuring the Impact of CDBG Spending on Urban Neighborhoods, March 2004, The Urban Institute
② Smith, B, The impact of tax increment finance districts on localized real estate: Evidence from Chicago's multifamily markets, July 2004, Journal of Housing Economics

③ Wardrip, K, Public Transit's Impact on Housing Costs: A Review of the Literature, August 2011, Center for Housing Policy

④ Payton, S, Ottensmann, J, The Implicit Price of Urban Public Parks and Greenways: A Spatial-Contextual Approach, School of Public and Environmental Affairs Indiana University-Purdue University Indianapolis

⑤ Sousa, Changsan, Westphal, Measuring the Impact of Assisted Brownfield Redevelopment on Surrounding Property Values, May 2009, Economic Development Quarterly

³⁷ Opportunity At-Risk: San Antonio's Older Affordable Housing Stock

from improved cities, but in reality, the costs and benefits of improvement are not shared equally. As described in earlier sections, rising housing prices result in displacement for some, although neighborhood improvements benefit those able to stay, profit or move in.

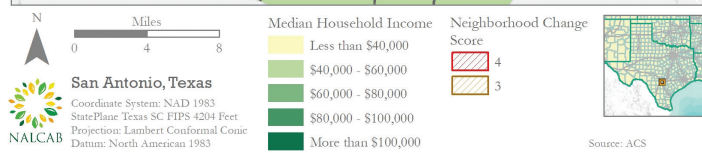
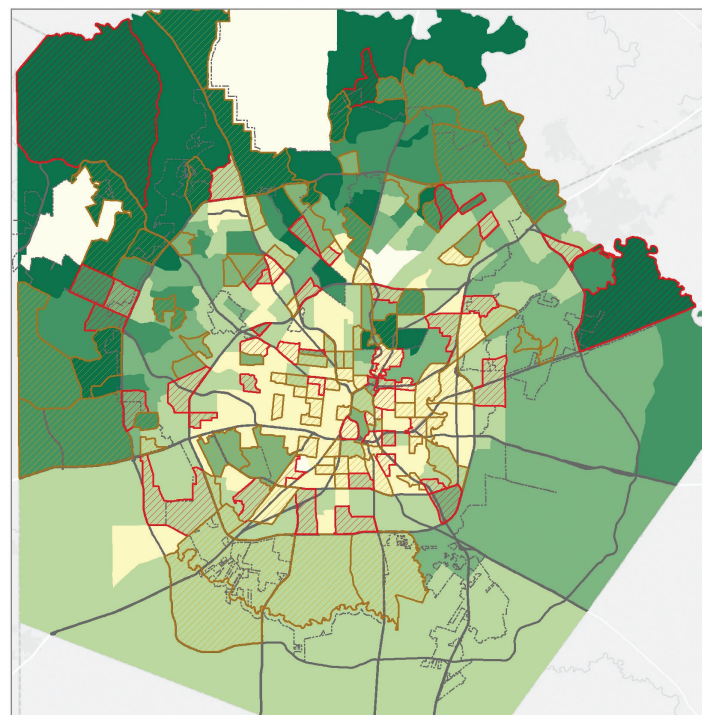
In the map below, neighborhood change and neighborhood income level are displayed together to help identify the low-income parts of the city where residents are most likely to be priced out.

The City of San Antonio can mitigate the impact of future public investments on displacement so that neighborhood improvements benefit residents of all income levels. This section includes two types of recommendations in service of equitable, inclusive growth: 1) those that are protective in nature and prevent direct or indirect displacement that would otherwise occur, and 2) those that are proactive in nature and leverage public resources more efficiently for affordable housing preservation and development.

In today's fiscal climate, creatively leveraging scarce public resources is particularly important. COVID-19 related expenses and tax revenue reductions are taking a toll on city and county budgets. While we cannot entirely eliminate the need for additional funding, the proactive recommendations included below strive to help San Antonio work smarter with the land, buildings and money already available.

Neighborhood Change Score and Median Household Income by Census Tract

Neighborhood Trend Analysis 2013 - 2018



Current Policies/Programs:

City support through fee waivers, the Tax Increment Reinvestment Zone (TIRZ), the Center City Housing Incentive Policy (CCHIP), or resolutions of support or no objection for LIHTC all require a statement saying that there will be no direct displacement, or a mitigation plan, as a result of the project. However, the city does not have prescriptive requirements as to what constitutes a sufficient mitigation plan.

Protective Measures



a. Action: Cease public support to market-rate development that displaces residents.

Implementation Timing: Short Term (1-2 years)

Lead: City Council, Mayor's Office

Supporting Entities: Neighborhood and Housing Services Department (NHSD), Center City Development Office (CCDO), San Antonio Housing Trust (SAHT)

The mayor and city council members have made it clear that the city should no longer support new market-rate development that displaces residents (including market-rate development that includes 20% lower-income units onsite). However, this intent needs to be codified. City council should bar any city support — including land sales, tax abatements, tax reimbursements, fee waivers or zoning changes — to development projects that will displace low-income residents or discriminate against veterans or individuals with housing vouchers.

NOAH preservation projects, affordable housing preservation projects and redevelopment projects that require residents to move are distinguished from development of higher-end housing and are addressed in the next recommendation.



b. Action: Require one-for-one replacement of demolished or upgraded affordable housing.

Implementation Timing: Short Term (1-2 years)

Leads: City Council, San Antonio Housing Authority (SAHA) Board

Supporting Entities: Neighborhood and Housing Services Department (NHSD), San Antonio Housing Trust (SAHT), San Antonio Housing Authority (SAHA), Affordable Housing Developers

Renovating and redeveloping aging affordable housing will continue to be necessary in the coming years. The Preservation Network ([see page 30](#)) should guide the city's commitment to reinvesting

in the affordable housing stock before buildings are too dilapidated for recovery. However, there are, and will continue to be, some cases where tenants must be temporarily relocated during a major renovation or a demolition of their building. In these cases, the developer must be required to replace every unit of restricted affordable housing at the same income level and price point as the pre-existing unit. For public housing units, this means new units would be priced to be affordable to households who earn 30% of AMI or less. It may be desirable at times for replacement units to be built off-site or in a different, more amenity-rich area, but the city cannot afford net losses of deeply affordable housing.

For large redevelopment projects, one-for-one replacement at deep affordability levels will significantly change underwriting requirements and may require the city to be a major partner in financing the development. Thus, a resolution or policy statement that codifies one-for-one replacement requirements will also necessitate a financial commitment from the city to partner with SAHA and other owners of distressed affordable housing.

Affordable housing developers who relocate tenants must provide strong relocation plans and assistance, and guarantee a right to return for relocated tenants. When federal funds are involved, the Uniform Relocation Act (URA) specifies processes and resources that must be made available to tenants through redevelopment-related relocation. URA standards should serve as a minimum for any redevelopment project. However, additional resources should be made available on a project-by-project basis to address unique needs, including customized community and resident input processes, resident counseling, and expanded knowledge sharing.

Models: The Nashville Public Housing Board has committed to one-for-one replacement of all public housing units that are demolished through their large-scale modernization effort using the federal Rental Assistance Demonstration (RAD) program.



c. Action: Require disclosure of direct displacement prior to planning approval.

Implementation Timing: Short Term (1-2 years)

Lead: Development Services Department (DSD), City Council

Supporting Entities: Neighborhood and Housing Services Department (NHSD)

The Development Services Department (DSD) approves requests for new development, including land use changes and exceptions. The DSD should add a simple form for developers to disclose any direct displacement that will result from their development project or rezoning request. With disclosed displacement, developers should also be required to submit a displacement mitigation plan. The elements and requirements of this plan should be defined more specifically by NHSD and community members. It could include elements like nine months notice to tenants, resources for relocation assistance, etc. Tenants should also be allowed to review and comment on plans. In support of the developer's displacement mitigation plan, NHSD should coordinate supplemental case management, emergency rental assistance and housing counseling, as they have in the past.

Proactive Measures



d. **Action:** Designate to a displacement mitigation fund a percentage of total investment in large public works projects.

Implementation Timing: Short Term (1-2 years)

Lead: Development Services Department (DSD), Department of Arts and Culture, City Council

Supporting Entities: Neighborhood and Housing Services Department (NHSD)

This recommendation builds on two strategies in the Housing Policy Framework. That report recommends that public agencies be required to conduct a displacement impact assessment for any public project that receives \$15 million or more in public investment, and to budget for mitigation. It also recommends creating a fund to mitigate the impacts of displacement.

Both national research and local data show that public investment can trigger displacement. With this in mind, the city should require by ordinance that city agencies, as well as the county and San Antonio River Authority, assess the direct and indirect displacement effects that may result from rising land and housing values within a defined area (e.g., one-half mile) of any major investment over a certain size (e.g., \$15 million per the Housing Policy Framework). They should also be required to designate a minimum percentage of that total investment (e.g., 1% of public funds) for a fund that supports displacement prevention and mitigation measures such as relocation assistance, homeowner outreach and individual case management.

There is already a local precedent and process for requiring a set-aside. The city currently requires a percentage of public works projects be invested in public art. Like public art, displacement prevention has both individual and public benefits. Keeping individuals in their homes and out of homelessness ultimately saves money on services and publicly funded housing. Housing displacement prevention also helps to retain San Antonio's unique culture and history, which is a draw for tourism and benefits tourism-related businesses.

As they do for public art, the Department of Arts and Culture could oversee calculating and creating the set-aside, while NHSD would disseminate the funds. NHSD must be required to work with neighborhood-based organizations and community members to ensure that funds are spent on neighborhood-specific needs and priorities.



e. Action: Expand housing options for people with nontraditional income.

Implementation Timing: Short Term (1-2 years)

Lead: Neighborhood and Housing Services Department (NHSD)

Supporting Entities: San Antonio Housing Authority (SAHA), San Antonio Housing Trust (SAHT), Office of the City Attorney,

Current housing choice voucher holders, amongst many others with non-wage income, have difficulty finding landlords who will accept them. Rejection of otherwise qualified tenants is sometimes due to stereotypes and other unfounded notions about voucher holders, particularly when those applicants are also people of color.

The City can begin by prohibiting source of income discrimination of all developers and owners who receive city benefits, including fee waivers, tax benefits and city-owned land. Sources of non-wage income that should be valid and acceptable include Housing Choice Vouchers, Veterans Affairs Supportive Housing (VASH) vouchers, Social Security benefits, child support, and alimony.

The City can also require all new developments receiving property exemptions or other local public benefit to dedicate up to 10% of the units at the complex for tenants with vouchers.

Finally, the City can advocate for changes at the State level to allow for broadly applicable local source of income anti-discrimination ordinances. Currently, unless developers receive City benefits, they cannot be required to accept qualified tenants with non-traditional income. NHSD suggests advocating for removal of the statewide preemption against local source of income anti-discrimination laws.



f. Action: Expand the Office of Historic Preservation (OHP) Vacant Building Program to 300 square miles, with a goal of creating housing opportunities for families earning 50% of AMI or below.

Implementation Timing: Long Term (3-5 years)

Lead: Office of Historic Preservation (OHP)

Supporting Entities: City Manager's Office, Neighborhood and Housing Services Department (NHSD), San Antonio Housing Trust (SAHT)

The Vacant Building Program works with existing property owners to secure and register vacant buildings and to find ways to use the buildings productively. By ordinance, it can be enforced in roughly 112 of the city's 500 square miles. Program staff help owners, including lower-income Latinx and Black owners, put together a workable plan for the property. When staff are unable to locate the owner, connect them to appropriate resources, or come to a resolution with the owner, they have a variety of paths they can explore to resolve the issue. This includes referring tax delinquent properties to foreclosure.



This program, with some evaluation and tweaks — which should include more outreach to neighbors about property reuse possibilities — could be used to identify potential properties for affordable housing development. Approximately 60% of properties in the current inventory are single-family residences. However, COVID-19 may result in more vacant buildings of other types. The economic downturn and rise of a work-from-home culture may leave more vacant office and commercial buildings available for reuse as affordable multifamily housing. Funding for more staffing of the Vacant Building Program could come, in part, from increased registration fees, fines and fees if court proceedings are necessary.

g. Action: Review existing data to establish complete inventories of vacant land and buildings in San Antonio.

Lead: Office of Historic Preservation (OHP)

Supporting Entities: Planning Department, Development Services Department (DSD), Neighborhood and Housing Services Department (NHSD), Public Works Department, Finance Department

It can be difficult to redevelop vacant land and buildings in San Antonio because developable parcels are both expensive and in demand. Moreover, there is a need to better collect, analyze, and display data to understand the type and characteristics of vacant land and buildings throughout San Antonio to identify potential opportunities for acquisition and development. In cities with effective land banks, for example, one tool that can be used to help to address the negative impacts of vacant property and acquire and transfer such properties to a more responsible end user in line with local priorities for land--including affordable housing. The primary acquisition pipeline for land banks is the tax foreclosure process, though market conditions generally impact the availability of this type of inventory . A land bank or other type of entity focused on acquiring vacant land for the purposes of supporting neighborhood priorities for land would benefit a great deal from a more robust databased of vacant property. This database would identify liens and debts on the properties, a prerequisite to knowing whether the city can use public liens to compel proper transfers, and thereby create a pipeline of affordable housing opportunity sites. For vacant buildings, the inventory should also help identify which vacant properties are most at risk of converting to market rate or undergoing redevelopment, and which properties make the best candidate for preservation. Key data points to collect include:

- ▶ Total outstanding tax debt
- ▶ Total years tax delinquent
- ▶ Total outstanding code lien debt
- ▶ Nature of code lien debt (e.g., weed lien, board up lien, demo lien)
- ▶ Total years code lien(s) outstanding
- ▶ Assessed value
- ▶ Square footage
- ▶ Year built (buildings)
- ▶ Years vacant (buildings)

While compiling existing data is an important first step, we also recommend creating a complete housing database/inventory focused on housing conditions. This next step would require new data collection. Street-level surveyors would assess the physical condition (excellent, good, fair, poor, etc.) of both properties and housing structures. This would be recorded in the database to help guide proactive outreach efforts for rehab/preservation programs. A neighborhood pilot program that targets one of the historically disinvested core neighborhoods could be a good place to start for capturing this kind of data.



h. Action: Prioritize property sales and transfers of publicly owned land for development at price points affordable to households earning 50% of AMI or below. Create a land banking program to proactively acquire parcels in neighborhoods with high-displacement risk.

Implementation Timing: Long Term (3-5 years)

Leads: City Manager's Office, City Council, Neighborhood and Housing Services Department (NHSD), Office of Urban Redevelopment (OUR SA)

Supporting Entities: Bexar County, VIA Metropolitan Transit, Planning Department, Center City Development & Operations Department

Beginning immediately, developers who are seeking to build affordable housing for households earning 0-50% of AMI should have the first opportunity to make a competitive offer on public land sales before any other buyers (e.g., the first 30 days on the market).

Longer term, the City of San Antonio should explore creating a land bank or land banking program. Land banks are governmental entities or nonprofit corporations imbued with special authority—usually through state enabling legislation—to convert vacant, abandoned, and tax delinquent properties into productive uses aligned with a range of community goals and priorities. These goals and priorities, which should be established in partnership with residents and neighborhood leaders, often include the creation of affordable housing, but also the need for open space or parks, equitable economic development, or other land uses. A land banking program can have similar goals and can be established within a local government without enabling legislation, though its authority to acquire and dispose of land is limited to whatever authority and procedural requirements apply to the local government that created the program.

In Texas, state legislation allows certain cities to create a land bank or land banking program for the narrow purposes of acquiring multi-year tax delinquent properties to support the creation of affordable housing. While there may be a need to explore new and more expansive land banking powers or authority in the future, for now and given the immediate need for more affordable housing the City of San Antonio should consider exploring the creation of a land bank or land banking program under existing law to support the creation of affordable housing. as a first step, the city should analyze potential inventory to support a land bank by creating an comprehensive list of vacant land, starting with vacant, publicly owned land.

For a land banking program to be effective in San Antonio, there will need to be many local process changes. Typically, land banks receive land through the tax foreclosure process. However, the number of tax foreclosed properties is limited by current market conditions and demand for land in San Antonio. Owners are redeeming their taxes before foreclosure, and properties that are made available through tax foreclosure auction are being bid up by private market investors. According to current Bexar County estimates, at any given time there are fewer than 100 publicly owned parcels acquired through tax foreclosure, many of which are non-conforming lots that likely cannot be developed. COVID-19, however, and its impact on the economy may result in more tax foreclosures and an increased pipeline.

The Urban Development Authority or a land-banking entity must also have sufficient dedicated funding to acquire land and compete with private developers, home flippers and others in order to ensure that land is preserved, developed or reused. Land reuse goals should not only prioritize lasting affordability for households earning under 50% of AMI, but also be determined by residents, particularly in neighborhoods with a history of neglect and disinvestment. Some strategic tasks that can help establish a strong land bank are:

- ▶ Explore what could be done to improve the Vacant Lot Initiative.
- ▶ Work with Bexar County and the law firm tasked with collecting delinquent property taxes to ensure that, as a matter of course, all outstanding code fines, fees and liens are added to the amount foreclosed in delinquent property tax foreclosure cases.
- ▶ Adopt an interlocal agreement to transfer multi-year tax delinquent land to the city or nonprofit partners.
- ▶ Work with Bexar County and the law firm tasked with collecting delinquent property taxes through tax foreclosure to enforce delinquent taxes (if needed) or to pilot a “Code 25” list, which would allow the city to identify 25 valuable tax delinquent properties to move through tax foreclosure proceedings.



i. Action: In the Strategic Housing Implementation Plan (SHIP) team, identify new sources of revenue for investments in displacement prevention and affordable housing preservation.

Implementation Timing: Short Term (1-2 years)

Lead: Strategic Housing Implementation Plan (SHIP) team

This recommendation mirrors the MHPTF Report recommendations to increase investment in housing and create dedicated revenue sources for affordable housing.

Throughout this report we have identified funds that the city can grow and leverage for displacement prevention. Examples include establishing a set-aside of public funding in large infrastructure and public works projects, using Mobile Home Park inspection program revenue, leveraging SAHA resources to maximize units targeting households who earn 0-50% of AMI, and lengthening the affordability requirements for all newly funded housing.

Nevertheless, a significant commitment to inclusive growth and racial equity in housing will require more than small, incremental changes in annual funding; it will require a major financial commitment. We are in difficult times to raise new revenue, but it is more important than ever that government and philanthropic entities rise to the occasion. The group assembled to guide the Strategic Housing Implementation Plan is well positioned to take on this challenge; identifying new revenue sources is central to the success of the Housing Policy Framework broadly, as well as the displacement challenges and recommendations contained in this supplementary report. Already, creative ideas are percolating, such as using Neighborhood Empowerment Zones, partnering with the hospital system, issuing county bonds, or using interest or fees collected from tax delinquent properties. These, and other ideas, should be analyzed for their revenue potential.



Center for Community Progress: <https://www.communityprogress.net/>

Endangered: San Antonio's Disappearing Mobile Home Parks: <https://law.utexas.edu/wp-content/uploads/sites/11/2020/01/2020-01-ECDC-mobile-homes.pdf>

Local Housing Solutions: <https://www.localhousingsolutions.org/>

National Equity Atlas: <https://nationalequityatlas.org/>

Opportunity At Risk: San Antonio's Older Affordable Housing Stock: <https://www.sanantonio.gov/Portals/0/Files/HistoricPreservation/CurrentProjects/AffordableHousing/OpportunityAtRisk-Report.pdf>

Preserving Austin's MultiFamily Rental Housing, a Toolkit: <https://law.utexas.edu/wp-content/uploads/sites/11/2015/11/2007-04-ECDC-Toolkit-Preserving-Multifamily-Housing.pdf>

San Antonio Equity Atlas: <https://www.sanantonio.gov/Equity/Initiatives/Atlas>

SA Tomorrow: <https://www.sacomplan.com/>

Status of Women In San Antonio: <https://www.sanantonio.gov/Portals/0/Files/health/News/Reports/StatusOfWomen/StatusOfWomen-Full.pdf>

Texas Anti-Displacement Toolkit: <https://sites.utexas.edu/gentrificationproject/texas-anti-displacement-toolkit/>