

CITY OF MIDLAND
Analysis of Impediments to
Housing Choice
September 2025-2029



Executive Summary

The current Analysis of Impediments to Fair Housing is set for a five-year review period aligned with the City's 2025-2030 Consolidated Plan, which spans from October 1, 2025, to September 30, 2030. Midland Texas remains the epicenter of the global energy economy for the Texas petroleum industry; nestled in the vast Permian Basin Region, which is the site of some of the largest oil and gas resources in the world. Midland economic markets has long been a beacon for those seeking the opportunity and prosperity for a better life. When the energy industry is thriving, there's typically an influx of people moving to the area, which boosts demand for housing. It also has a diverse population, which can influence lending patterns. Understanding the ethnic composition and the economic status of households the (AI) will provide insight into the housing market demand and loan availability Midland County. Midland and Martin County produced (23%) percent of the total oil and (11%) percent of the total natural gas in Texas during the last twelve months according to the Railroad Commission of Texas (rrc.texas.gov).

The official metropolitan area population for Midland County in 2020 was 169,983; the estimate in 2024 is 184,700, representing an average increase of 2,450, or (1.04%) percent, annually since 2020 (Lanier Real Estate, LLC) This estimate does not include the influx of transient workers associated with oil exploration. It is the private sector that has the greatest impact and influence in the homebuyer and rental markets, either expanding or curtailing fair housing choices. Within the public sector, policies and practices can also significantly affect housing choice. As for the composition of bodies of elected or appointed individuals who make or recommend policy for the City of Midland, the publicly elected City Council is made of seven members of which two represent census tracts with a poverty rate 50% or below. The City of Midland Comprehensive Plan (Tall City Tomorrow) provides a guide for future development policy. It is a tool to guide city priorities and directions and provide context for making key land use and public investment decisions.

The Midland 2025 Master Plan is the tool used to guide all rezoning requests and subdivision plats (including those within 3.5 miles of city limits). Land use control is most commonly achieved by zoning ordinances such as those enacted in Midland. How land is zoned can support or hinder implementation of public policy that seeks to provide a mixture of housing, including affordable housing. A zoning ordinance can restrict the type of housing; determine the density of housing and the lot sizing. The effects can be exclusionary and/or the cost of housing unnecessarily increased. The City of Midland will continue to work towards an equitable distribution of stock (workforce housing, subsidized housing, market rate housing and supportive services housing. The city's use of planned district zoning allows residential development in a manner that conform to all requirements of the zoning districts. The Residential Zoning Districts Map displays residential districts by the housing density allowed in individual districts. The City's public policies have resulted in the favorable allocation of land for development of multi-family sites located outside of minority-concentrated areas.

While neighborhoods need to have a strong role in decisions regarding development proposals, NIMBYism can be a significant barrier to affordable housing. NIMBY is short for "not in my backyard." Unfortunately, NIMBYism is usually associated with the misconception and preconceived notions of residents, the policies and practices of government entities can influence the role that NIMBYism plays in land use and zoning decisions promoting positive outcomes. The city's subdivision code can also affect the cost of housing due to its public improvement requirements. Excessive design standards and infrastructure requirements (size of streets, curb and gutter, sidewalks, etc.) are passed on to the price of housing. Excessive public right-of-way requirements are a cost burden to developments. The city will waive these requirements for development under certain circumstances (public good). Where excessive right-of-way exists; the City may where appropriate issue right-of-way use permits thereby reducing the cost of installing off-street parking. The use of CDBG funds for public infrastructure (street paving, curb and gutter, sidewalks, etc.) also aids in keeping the cost of housing affordable.

Development standards such as building codes, housing standards and site requirements (parking, landscaping, etc.) add to the cost of housing especially if such standards are overly restrictive and excessive. The balance is

the safety and quality assurances that are provided to citizens, especially those with limited options. The city updated its building codes 2018 to adhere to the following: International Building Code, International Plumbing Code, International Mechanical Code, International Fuel Gas Code, International Residential Code and the International Energy Efficiency Code, all with local amendments (City of Midland). The construction of affordable housing in Midland is significantly affected by these various governmental standards. All housing construction development requires compliance with the Texas Minimum Construction Standards and the Texas Accessibility Standards and the City's housing rehabilitation program. The city also collects building permits and other charges. Under certain circumstances, some of these charges could be viewed as duplicative, or onerous. Generally, Midland's building related fees are not excessive. City does not recover full cost of administering those permits. When the City (as opposed to a private property owner) initiates a process, fee payment from affected property owners can be waived. The city will waive or reduce appropriate fees and charges (e.g., building permit fees, water and sewer taps) on non-profit sponsored housing development.

Other Factors

In 2024, the average sales price has climbed to an impressive \$426,623, reflecting an 8.2% increase from 2023's \$394,382. The recent decline in the Midland housing market availability highlights the strategic benefits of investing in a home in the area sooner rather than later. The total number of home sales have decreased in 2023 from 2024 by 138 units which still represent a very resilient market relative to 2015 number of units sold. Although Midland County has negative sales growth there is an imbalance between the number of sellers and buyers in the market which is manifested in a declining number of units sold (Lanier Real Estate, LLC). Investing in a home in Midland remains a wise decision, and homeowners can feel assured that their investment is secure in this strong and promising market.

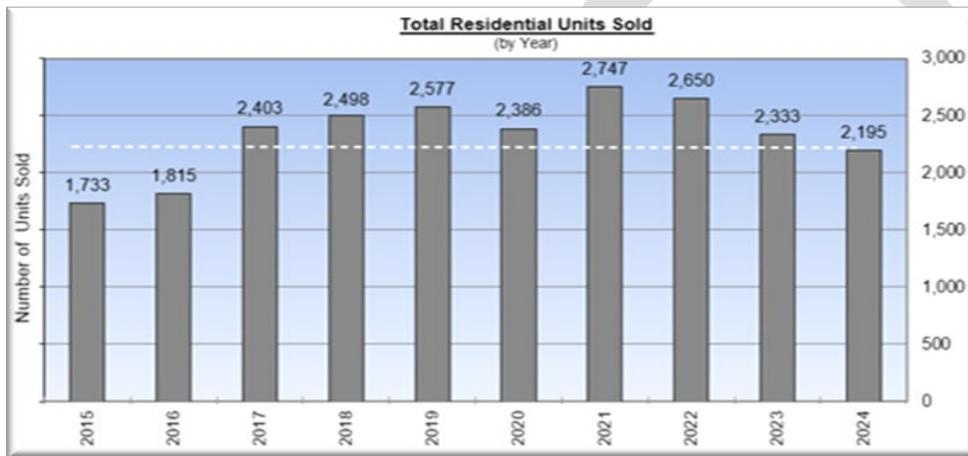
2024 Housing Review

(Midland County)

	Year End Comparison		
	2024	2023	%
Available Homes for Sale (Avg/mo)	489	461	6.1%
Pending Homes Sales (Avg/mo)	230	267	-13.9%
Sold Data:			
Total Homes Sold (in MLS)	2,195	2,333	-5.9%
Average Sales Price	\$426,623	\$394,382	8.2%
Median Sales Price	\$350,000	\$355,000	-1.4%
Average \$/SqFt	\$187	\$177	5.6%
List to Sold Price Ratio	97.37%	97.48%	-0.1%
Average Days On Market	46	41	12.2%
Gross Sales Volume	\$936,437,602	\$920,093,522	1.8%

**The statistical data herein contained has been compiled from the Permian Basin Board of Realtor's MLS and is deemed accurate, but not guaranteed.*

(Lanier Real Estate, LLC)



(Lanier Real Estate, LLC)

FAIR HOUSING OVERVIEW CITY OF MIDLAND

Defining Fair Housing in Midland

The purpose of this Analysis of Impediments (AI) is to provide essential, specific, and detailed information and data to municipal officials and staff, policy makers, housing developers, lenders, and fair housing advocates. The Analysis of Impediments (AI) helps build public support for fair housing efforts. This report represents Midland's efforts in making an objective assessment of the nature and extent of fair housing concerns in the city, and the potential impediments to making fair housing choice available to its residents. The Federal Fair Housing

Act of 1968 and its amendments, including those made in 1988, prohibit discrimination in all housing-related activities, including sales, rentals, and negotiations. The Act safeguards against discrimination based on race, religion, national origin, familial status, and disability. The 1988 amendments expanded protections to families with children and individuals with disabilities, including provisions for "reasonable accommodations" for those with disabilities.

Discrimination Against Families with Children Familial status refers to individuals with legal custody of one or more persons under eighteen, including pregnant individuals or those seeking custody of a minor (Housing and Urban Development (HUD) Office of Policy Development and Research (HUD PD&R)).

Families with children enjoy the same protections against housing discrimination as other protected groups. Exceptions that allow discrimination against families with children are limited to housing designated exclusively for older adults.

Provisions for People with Disabilities the Fair Housing Act defines disability as a physical or mental impairment that substantially limits one or more major life activities. It also includes individuals with a history of such impairments or those perceived as having such impairments. The Act prohibits landlords from asking questions about a person's disability that are not applicable to other applicants.

Reasonable Accommodations and Modifications It is unlawful to deny reasonable accommodations that allow individuals with disabilities equal access to housing. This includes exceptions to "no pets" policies for service animals and designated parking for individuals with mobility impairments.

Additionally, individuals with disabilities may make reasonable modifications to their living spaces at their own expense, such as installing grab bars or widening doorways. **Accessibility Requirements for New Multi-family Housing** Multi-family buildings constructed for first occupancy after March 13, 1991, must be fully accessible to individuals with disabilities. Accessibility standards include accessible entrances, common areas, and sufficient space within units to accommodate wheelchair use.

Changes to the Fair Housing Act have been made to enhance protections and enforcement under the Fair Housing Act, including provisions for older adults and measures to improve law enforcement mechanisms and promote self-testing for discrimination. The State of Texas affirms its commitment to fair housing through the Texas Fair Housing Act, which prohibits discrimination based on race, religion, color, sex, national origin, disability, and familial status. This state law mirrors federal legislation and allows for local agencies to receive and investigate complaints. The U.S. Department of Housing and Urban

Development (HUD) monitors fair housing practices as a requirement for entitlement cities through the Community Block Development Grant (CDBG) program, which may allocate funds to fair housing advocacy organizations. The primary goal of fair housing initiatives is to ensure that all individuals have real housing choices. Grantees receiving CDBG funding under the Housing and Community Development Act are mandated to promote fair housing and conduct analyses to identify barriers to fair housing choice within their communities.

Each grantee which receives CDBG funding under Title I of the Housing and Community Development Act is required to further fair housing/fair housing planning by conducting an analysis to identify impediments and maintain records documenting their analyses and actions which become available to advocacy groups. HUD reviews the City's actions to ascertain if activities are carried out in a manner to affirmatively further fair housing in the public and private housing sectors. HUD issued a final rule on Affirmatively Furthering Fair Housing (AFFH) in 2015. While efforts to combat ongoing discrimination are important, they are also at the core of HUD's existing fair housing efforts. HUD's final rule is designed to support and facilitate those efforts but goes further and addresses other significant barriers to fair housing choice that have been largely absent from HUD's fair housing policy initiatives. Specifically, HUD's rule is designed to help address the legacy of segregation and factors related to locational choice that have been influenced by race, national origin, disability, and other protected classes, but typically do not rise to the level of discriminatory actions that violate other sections of the Fair Housing Act.

SCOPE OF ANALYSIS

This Analysis of Impediments (AI) resulted in a clear reestablishment and identification of six critical impediments to address in the next five years.

- Economic conditions impacting housing availability
- Limited Supply of Affordable Housing
- Areas of minority and/or low-income concentration
- Fair Housing & Schools Performance Data
- Private Loan market barriers that discourage homeownership
- Policy improvements needed for diverse community representation

The Analysis of Impediments (AI) process involves a thorough examination of a variety of data sets related to housing, particularly for persons who are

protected under fair housing laws. Analysis of Impediments (AI) sources include Census data, employment and income information, home mortgage application data, business lending data, fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain. The Analysis of Impediments (AI) also consisted of reviewing local housing programs including those of the City and examining public policy affecting location and development of housing as well as administrative policies, private lending information was also examined. Because housing choice is so critical, fair housing is a goal that government, public officials, and private citizens must achieve if equality of opportunity is to become a reality. The Community Development (CD) Division of the City of Midland conducted the Analysis of Impediments (AI). The community Development Division staff will have primary responsibility for implementation of City actions to overcome the effects of the impediments identified in the Analysis of Impediments (AI) and monitor progress reflecting the AI and actions in this regard. Relevant information was collected and evaluated using four applicable approaches:

- Primary Research, or the collection and analysis of raw data.
- Secondary Research, or the review of existing data and studies.
- Quantitative Analysis, or the evaluation of objective, measurable, and numerical data.
- Qualitative Analysis, or the evaluation and assessment of subjective data.

This Analysis of Impediments (AI) to Fair Housing Choice provides an overview of laws, regulations, conditions or other possible obstacles that may affect an individual's or a household's access to housing. Policies, practices or procedures that appear neutral on their face, but operate to deny or adversely affect the availability of housing to persons because of race, ethnicity, disability status and families with children may constitute such impediments.

The AI involves:

- A comprehensive review of the laws, regulations, and administrative policies, procedures, and practices.
- An assessment of how those laws, regulations, policies, procedures, and practices affect the location, availability, and accessibility of housing; and
- An assessment of conditions, both public and private, affecting fair housing choice.

- Surveying community organizations and individuals views of housing impediments.
- Geographic Area Covered.
- This report constitutes the AI for the City of Midland.

The City of Midland conducted research on various issues affecting fair housing to include demographics and zoning. Additionally, the CDBG Division interviewed key officials and citizens for a comprehensive review of current available information and data that impacts housing development in Midland.

ECONOMIC CONDITIONS IMPACTING HOUSING AVAILABILITY

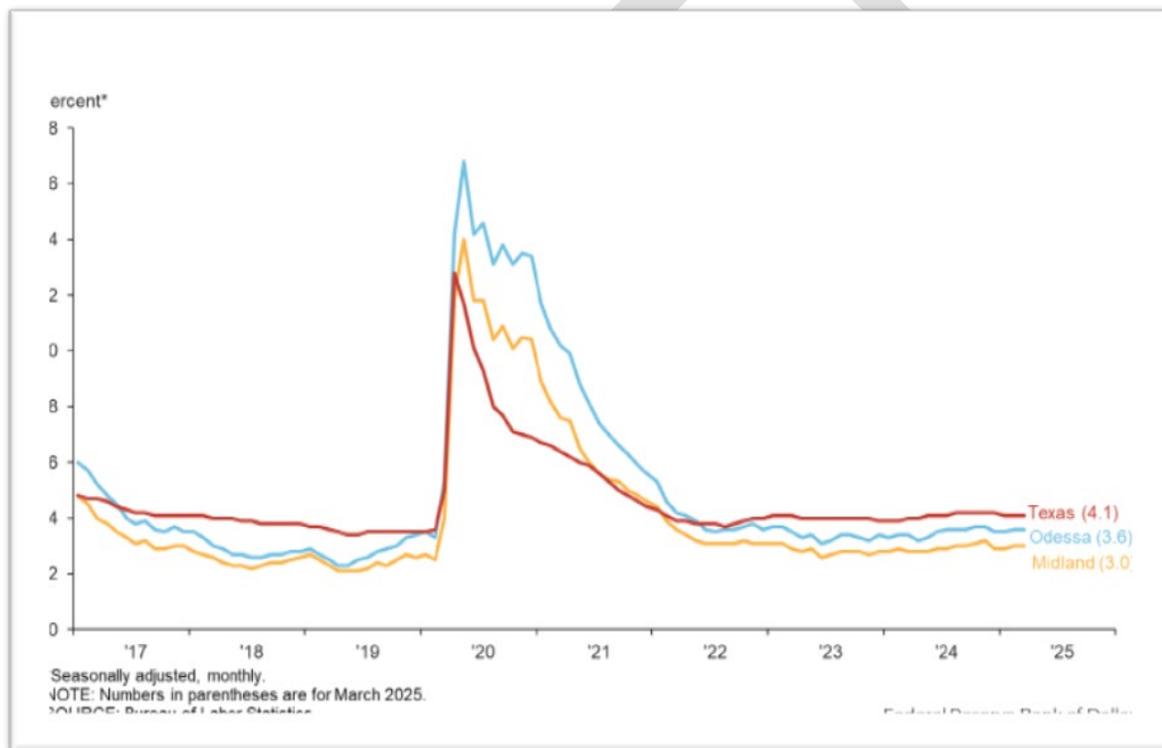
Despite fluctuations in the housing market due to persistently high interest rates, the Midland economic market grew by 2.18% in 2024 and has shown remarkable stability post COVID-19. The growth has remained consistent with the projections of the Priority Midland forecasting by economist Perryman Group in 2019. Despite the strong economic growth Midland is currently facing a severe shortage of affordable housing options. As of 2024, the average single home sale price in Midland County, Texas, reflects the ongoing trends in the housing market influenced by various factors such as demand, supply, and local economic conditions. Here's a breakdown of the key points regarding the average home sale prices in Midland County. Home sales in October 2023, 198 homes sold in Midland County, which was a 22.9% increase from October 2022, in 2023, the median price of a home sold in Midland County, Texas was around \$300,000, and in December 2024, the median home sold price in Midland County, Texas was \$400,300. This was approximately 33.4% increase from the previous year (Realtor.com).

The employment landscape in Midland County, Texas, is significantly shaped by the oil and gas industry, as evidenced by the latest available data on employment distribution by industry. The mining, quarrying, oil, and gas extraction sector stands out as the largest employer, accounting for approximately 30-40% of the workforce. This prominence is largely due to the region's abundant oil and gas reserves. Following this, the construction industry employs about 8-10% of workers, playing a crucial role in meeting the ongoing infrastructure and housing demands in the area (U. S. Census 2023-2024). Manufacturing, while smaller in comparison at roughly 5-7%, still holds importance, particularly in the production of equipment related to the oil and gas sector. The wholesale trade sector constitutes around 5% of employment, with businesses in this category supplying goods to other industries, including

those tied to oil. Retail trade is another key player, employing approximately 10-15% of the workforce and serving the local population and workers in the region (U. S. Census 2023-2024).

Transportation and warehousing, crucial for logistics—especially given the transportation needs of the oil and gas industry—comprises about 5-7% of employment. The information sector remains relatively small, contributing less than 2%, though it is gradually expanding. Financial services, which include finance and insurance, as well as real estate, rental, and leasing, account for approximately 5-7% of the workforce, providing essential support to individuals and businesses alike (U. S. Census 2023-2024).

Unemployment rate remains low and stable:



(Federal Reserve Bank of Dallas)

Professional, scientific, and technical services represent roughly 6-8% of employment, offering a variety of services that bolster both the oil and gas industry and other sectors. Educational services, alongside healthcare and social services, encompass about 10-12% of the workforce, serving the community's educational and health needs. The arts, entertainment, and recreation sector contribute approximately 3-5% to employment, enhancing the

quality of life in Midland through local entertainment options (U. S. Census 2023-2024). Subsequently, this distribution underscores the dominance of the oil and gas sector in Midland's economy, with notable contributions from construction, retail, and public services. It's important to acknowledge that these percentages may vary slightly depending on the source and year of the data.

Average Home Sale Price 2023-2024

For potential buyers or investors, understanding the dynamics of the housing market in Midland County is crucial. Several factors significantly influence housing prices in the area. One primary driver is market demand, heavily influenced by Midland's economy, particularly the oil and gas industry. Job growth in these sectors often leads to increased home-buying activity. Additionally, prevailing interest rates set by the Federal Reserve and local lenders also affect housing loans; lower rates typically result in more loan applications. Specific programs like FHA and VA loans can further influence the number of loans taken out, especially among first-time homebuyers and veterans. Engaging with local housing authorities or financial institutions can provide valuable insights, and monitoring local economic conditions can enhance understanding of the housing loan landscape.

Location is another critical factor, as prices can vary significantly within Midland County. Homes situated in more desirable neighborhoods or those within better school districts generally command higher average prices. The features of a property also play a crucial role; homes that boast modern amenities, larger square footage, and attractive features like pools or updated kitchens typically sell for higher prices. When examining price trends, a comparison of 2024 to previous years suggests a modest increase in home prices due to ongoing demand and limited inventory, a trend that has been consistent since 2022 and 2023. Central Midland is noted for having higher average home prices, largely due to its proximity to various amenities and services. In contrast, areas such as southeast, northeast, and northwest Midland may offer slightly lower average prices, yet they remain popular among families in the region. Understanding these factors is essential for effectively navigating Midland County's housing market (U. S. Census 2023-2024).

Comparative Market Analysis and Factors Influencing Rent Prices

An investigation into local economic conditions reveals that factors such as job growth, employment rates, median household income, population changes, and housing development construction can significantly impact the rental market. These elements can either increase the supply of rental units, potentially stabilizing or lowering rents, or indicate a growing demand, particularly if upscale properties are involved. In 2023, the average rent for a two-bedroom multifamily unit in the Midland Metropolitan Statistical Area (MSA) fluctuates based on location, amenities, and market demand. Generally, these rents range from approximately \$1,359 to \$2,500 per month (Datausa.io).

Location plays a crucial role in rental pricing; units in downtown areas or neighborhoods with convenient access to amenities, workspaces, and schools tend to command higher rents. Conversely, properties situated farther from major points of interest may offer more affordable options. Additionally, amenities significantly influence rental rates, as properties with modern conveniences like fitness centers, pools, in-unit laundry facilities, and security typically have higher rents. Newly renovated or upscale buildings are also priced higher. Market demand in Midland is heavily influenced by the oil industry, leading to fluctuations in rental prices based on the economic climate and employment rates. An influx of workers during an oil boom can drive up demand and, consequently, rental prices. Areas with growing employment opportunities usually see increased demand for rental housing, particularly if household incomes are rising, which can support higher rent prices. The size and condition of rental units also affect pricing; larger units or those recently updated or remodeled may come with a higher price tag, while older buildings or units requiring more upkeep may be less expensive.

In high-demand areas, two-bedroom units can reach the upper rental range of around \$2,800 per month, whereas locations further from the city center may have rents closer to \$1,200 to \$1,500 (Datausa.io). For prospective renters, it is essential to consider these factors and conduct thorough research using rental websites, local listings, or real estate agents to obtain accurate and up-to-date information. Additionally, visiting potential properties and neighborhoods can provide valuable insights into which options best fit personal needs and budget constraints. Historical data indicates that increased demand for rental units, coupled with limited supply, tends to drive prices up. An analysis of rental prices from 2021 to 2024 reveals trends, showing a steady increase in the market prior

to COVID-19, which still reflects the economic impact of the pandemic. Therefore, it may be prudent to apply future growth rates to multifamily prices in 2025. Families in the Midland MSA who qualify for the City of Midland Community Development programs continue to experience a relatively lower cost of living compared to other regional cities of similar size. Households earning between \$35,000 and \$49,999 are classified as “Extremely Low” to “Low Income” cost burdened, spending more than 30%-50% of their income on housing costs (Datausa.io).

The maximum income for a family of four qualifying for the Community Development Block Grant (CDBG) program, classified as 80% of moderate income, is estimated at around \$85,000, highlighting the financial strain many families face in navigating the challenging housing landscape. The economic context of Midland is also shaped by its dependency on the oil and gas industry. Fluctuations in this sector can lead to variations in employment rates and income levels, directly affecting residents' borrowing capacity. A downturn in the oil and gas industry could increase unemployment and reduce income levels, making it harder for residents to secure loans and negatively impacting housing demand. Conversely, rising employment rates enhance individuals' chances of stable incomes, increasing their borrowing capacity and housing demand. Monthly spending comparisons indicate that while housing costs are projected to decrease by 9.89%, costs for groceries, utilities, and healthcare are expected to rise or fall at varying rates (Datausa.io).

Essentially, the dynamics of Midland's economy, particularly its reliance on the oil and gas sector, play a critical role in shaping housing demand, loan availability, and household spending patterns. Stakeholders, including potential homebuyers, renters, and policymakers, should closely monitor these trends to make informed financial decisions. A decrease in housing costs may provide homeowners with more disposable income, allowing for increased spending in other areas. However, renters may face rising costs, straining their budgets. The local economy's dependency on the oil and gas industry leaves it vulnerable to external shocks, which can ripple through housing demand and loan availability.

Economic Factors: Educational Attainment

The educational attainment landscape in Midland County reveals significant challenges and opportunities for improvement. A notable percentage of the population, estimated at approximately 13-17%, has not completed high school,

with 5-7% lacking education beyond the 9th grade and 8-10% having attended some high school without earning a diploma. This situation indicates that a substantial segment of the community may face difficulties with basic literacy and educational challenges, which could hinder their employment prospects and economic mobility. In contrast, 25-30% of the population are high school graduates or have obtained a GED, representing a positive step towards educational completion. However, many still lack higher education credentials, which are increasingly necessary for enhancing job opportunities. Furthermore, about 20-25% of residents have some college experience but have not completed a degree, suggesting that while there is interest in further education, various barriers may be preventing degree completion. This is further highlighted by the low percentages of degree holders in the community, with only 8-10% possessing an associate's degree, 15-20% holding a bachelor's degree, and around 5-7% achieving graduate or professional degrees. These statistics point to a potential skills gap in the workforce, particularly in professional and technical roles (U. S. Census 2023-2024).

The educational attainment statistics also indicate a heavy reliance on the oil and gas sector, which underscores the need for economic diversification. With only a small fraction of the population holding advanced degrees, increasing the number of residents with higher education could foster the development of other industries and lessen economic vulnerability. To address these issues, it is crucial to focus on workforce development opportunities that enhance local skills and attract businesses. Targeted initiatives should aim to close the educational gaps, particularly in higher education, by investing in educational programs and forming partnerships with local colleges. Stakeholder engagement is vital in planning educational programs that align with the specific needs of Midland's population. Collaboration between government entities, educational institutions, and the private sector can lead to more effective strategies. Strategic recommendations include implementing adult education and literacy programs to support those without high school diplomas, enhancing partnerships with community colleges to facilitate pathways for students who have some college experience but lack degrees, and promoting awareness campaigns about the benefits of higher education. Additionally, encouraging economic diversification by creating incentives for businesses in technology, healthcare, and other fields that require a more educated workforce is essential.

By focusing on these areas, Midland County can work towards improving educational outcomes, enhancing workforce skills, and promoting economic resilience for residents. The relationship between the multi-factors previously stated and household dynamics inevitably improves the affordability of housing in Midland County. A multifaceted approach that addresses educational outcomes, workforce skills, and economic resilience is crucial, as higher education levels often correlate with increased earning potential. By investing in local schools and adult education programs, Midland can equip residents with the knowledge and skills necessary to secure better-paying jobs. For example, partnerships with community colleges could offer vocational training that aligns with local industry demands, ensuring that graduates are workforce-ready and can afford housing. Enhancing workforce skills is essential in attracting businesses to the area and retaining talent. By establishing training programs tailored to the needs of local employers, Midland can create a skilled workforce that meets market demands.

This not only helps residents find stable employment but also encourages businesses to invest in the community, which can lead to job creation and higher wages. As residents earn more, their ability to afford housing improves, thereby reducing the financial strain on families. Moreover, promoting economic resilience is vital for maintaining housing affordability. Midland can focus on diversifying its economy by supporting small businesses and encouraging entrepreneurship. Providing grants or low-interest loans to startups can stimulate job growth and increase local production. This economic diversification helps buffer the community against downturns in any single industry, ensuring that residents have access to stable employment regardless of market fluctuations. By improving educational outcomes, enhancing workforce skills, and promoting economic resilience, Midland County can create a more sustainable environment where individuals can afford housing. This holistic approach not only addresses immediate housing concerns but also lays the groundwork for long-term community stability and growth.

Areas of Poverty and/or Low-Income Distribution

An indicator of the city's overall well-being is the number of persons with incomes below the federal poverty income level. The 2024 ACS reports that 10.9% of Midland County population lives in poverty. The median family

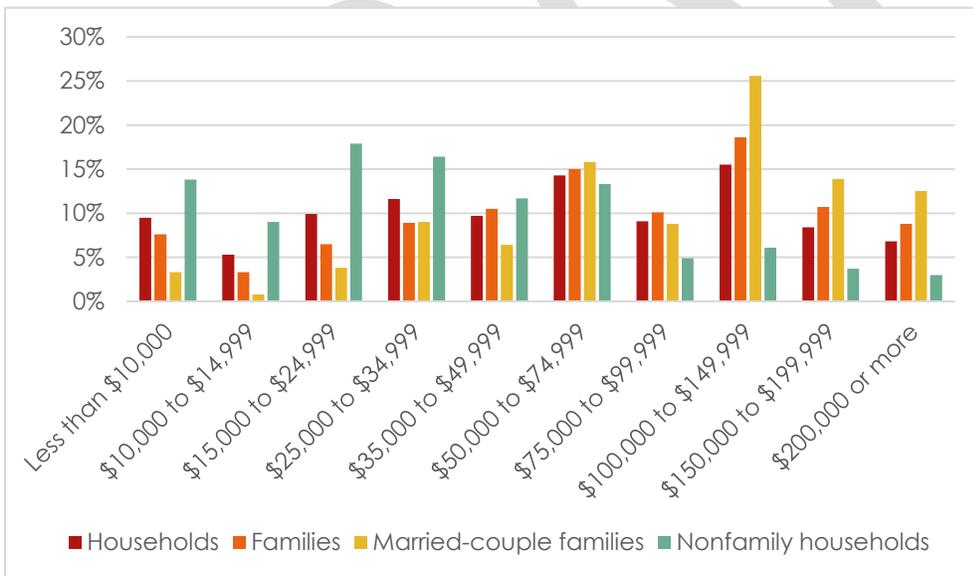
income (MFI) estimate for Midland by \$93,984 which surpasses the Texas median of \$67,321 (U. S. Census 2023-2024). This certainly is reflected in the economic growth of Midland. For HUD programs, eligibility is often limited to low-moderate income persons, meaning that an individual's or a household's income must be below eighty percent of MFI. According to HUD, 17.8 percent of Midland's population remain on the low-moderate income scale and recent ACS Census data reflect the similar percentages. Census Tract Maps also displays the low-income data on the Percent Low Income Population. Census tracts with the greater percentage of low-income persons also have a greater percentage of minorities. The employment attainment and income distribution landscape in Midland County, Texas, reveals a complex economic situation characterized by a wide range of household incomes.

According to the latest data from the U.S. Census Bureau and local surveys, a significant portion of the population (elderly) earns less than \$11,000 annually, indicating that many individuals and families are grappling with economic hardships. The next income bracket, which includes those earning between \$10,001 and \$14,999, typically consists of individuals in low-wage or part-time jobs who struggle to cover basic living expenses. As we move up the income scale, those earning between \$15,000 and \$24,999 may be underemployed or in low-paying jobs, contributing to the county's overall poverty levels. Families in the \$25,000 to \$34,999 range may be beginning to stabilize their financial situations, yet many still face significant financial pressures (HUD PD&R).

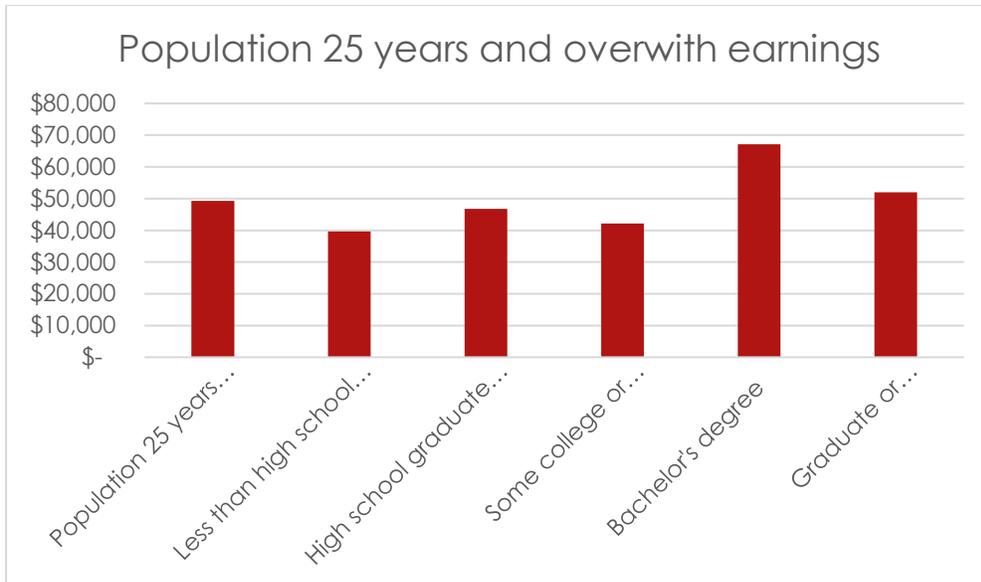
CDBG Target Area Educational Attainment & Income Correlation:



American Community Survey Midland Zip Code 79701 Educational Attainment Estimates in the Past 12



American Community Survey Midland Zip Code 79701 Income in the Past 12 Months (in 2023-2024 Inflation-Adjusted Dollars)



American Community Survey Midland Zip Code 79703 Educational Attainment Estimates in the Past 12



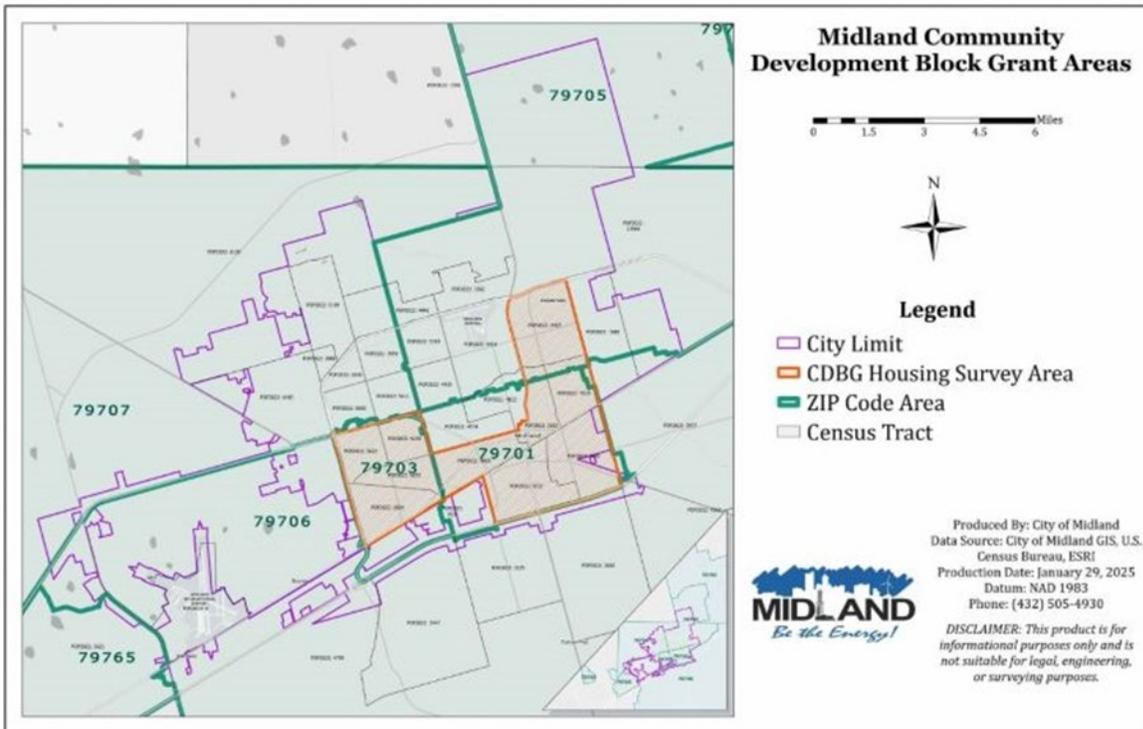
American Community Survey Midland Zip Code 79703 Income in the Past 12 Months (in 2023-2024 Inflation-Adjusted Dollars)

Limited Supply of Affordable Housing

During the 12 months ending January 2024, existing home sales were recorded at 3,400, a decrease of 450 homes or 12 percent, indicating a more rapid slowdown in sales compared to the previous 12-month period, which saw a 9

percent decrease. Meanwhile, existing home sales prices rose by \$11,350, or 3 percent, to \$346,700, which is slightly less than the 4-percent price increase observed in the previous year. New home sales saw a 24 percent drop, with 620 homes sold, down by 200 homes compared to the 3-percent decrease in the prior 12 months. This current level is significantly lower than the peak of 890 homes sold during the 12 months ending August 2022. Based on preliminary data, single-family home permitting grew by 100 homes, or 15 percent, over the 12 months ending February 2024. This increase is attributed to robust energy markets and a limited home supply contributing to the slightly tight sales market conditions. Mockingbird Ridge stands out as the latest single-family development in Midland, featuring homes with two to four bedrooms, ranging from 1,010 to 2,660 square feet, and starting at \$201,950. The development anticipates completing approximately 475 homes by the end of 2024, with a total of around 2,000 homes expected by 2030.

The sales market in the Midland metropolitan area is currently experiencing slightly tight conditions, with an estimated vacancy rate of 1.5 percent, a slight reduction from 1.6 percent in April 2020. As of February 2024, the region had a 2.4-month supply of for-sale inventory, compared to a 2.0-month supply in February 2023, according to the Texas Real Estate Research Center at Texas A&M University. The supply of inventory has remained below 3 months since October 2021. Home sales over the 12 months ending January 2024 totaled 4,025, marking a decline of 640 sales or 14 percent from the previous year, as noted by CoreLogic, Inc., with analyst adjustments. Interestingly, the percentage of home loans in the metropolitan area that were seriously delinquent or transitioned into real estate-owned status fell to 1.2 percent in January 2024 from 1.9 percent in January 2023, although this rate remains above the state and national rates of 1.1 and 1.0 percent, respectively (Real Estate Center at Texas A & M University). Midland is divided into several zip codes and census tracts, each with distinct demographic characteristics. For this analysis, the focus will be on those zip codes and census tracts that meet the HUD criteria for minority or low-moderate income concentrations. The city population is relatively young and racially and ethnically diverse. There are two zip codes 79701, and 79703, along with the prevailing census tracts that have minority concentrations per HUD's definition.



Many of these zones have lower-income levels and the most vacant properties. This may serve to limit housing opportunities for households earning less than HUD median income for a family of four (4). Despite a solid economic base, over 36% of the population is in the low-moderate income categories as defined by HUD. Affordability is a problem for a very large portion of the renter population. There are concerns about the quality of the housing stock and the increased need for maintenance and rehabilitation of both rental and owner units. Though there are relatively fewer elderly persons by census, the city has a high percentage of senior/persons living alone, thus a demand for smaller housing units is projected to increase.

Seniors spend more of their income for housing due to the lack of availability promoting the CDBG Division to work and coordinate construction opportunities with our local Public Housing Authorities (PHA's). A structured approach to resolving housing deficiencies aims to ensure thorough engagement and analysis with community members can providing a clear understanding of the housing conditions in Midland. Midland, like many cities across the United States, faces several challenges that limit the supply of both single-family and multifamily housing. These challenges are particularly acute for low- to moderate-income households, which often belong to various ethnic groups. There key issues contributing to the limited housing supply in Midland County

including a myriad of economic factors that create significant barriers to affordable housing development. Rising construction costs, fueled by inflation and supply chain disruptions, have increased the prices of materials and labor, making it challenging for developers to produce affordable housing. Public transportation plays a role in expanding the supply of affordable housing to groups in need and others protected under fair housing laws. At issue is the ease with which an individual can travel from home to work if he/she lives in a lower income area or an area of minority concentration. If public transportation from a lower cost neighborhood is inefficient in providing access to employment centers, that neighborhood becomes inaccessible to those without dependable means of transportation, particularly very low-income residents, the elderly, and persons with disabilities.

Furthermore, escalating land prices driven by demand from the oil and gas industry add to the financial hurdles for those looking to establish new housing projects. Regulatory challenges also play a crucial role, as restrictive zoning laws often limit the types of housing that can be built, such as preventing the development of multifamily units that could provide more affordable options. Additionally, permitting processes can at times deter developers from pursuing new projects; particularly those aimed at affordability. Infrastructure constraints further complicate the situation. In some parts of Midland, existing utility infrastructure lacks the capacity to support new developments, while limited public transportation access makes certain areas less attractive for housing development, thus exacerbating the supply issue. This is compounded by market dynamics, where a booming job market—largely due to the oil and gas sector—has increased housing demand without a corresponding increase in supply, leading to an affordability crisis. Speculative investment in properties for rental income has also driven prices up, further squeezing low- to moderate-income families out of the housing market.

The impact of these factors varies among different ethnic groups within the community. For instance, the Hispanic/Latino community in Midland faces lower homeownership rates due to economic barriers and limited access to credit, while rising rental prices force many families to allocate a larger portion of their income to housing, resulting in financial instability. The African American community often experiences historical disinvestment in their neighborhoods, resulting in fewer affordable housing options and increased vulnerability in the housing market. In contrast, the White Non-Hispanic community may generally have better access to resources and credit, but they too are affected by rising

prices that hinder first-time homebuying. Apartment market conditions in Midland are currently balanced. The oil and gas extraction industry's boom and bust cycles have significant impacts, causing substantial fluctuations in the apartment vacancy rate. In 2020, oil production declined due to the lowest oil prices since 2000, leading to a softening of apartment market conditions and a record high vacancy rate of 21.7 percent by the third quarter of 2020.

However, since 2021, increased oil production and prices have improved apartment market conditions, as transient workers migrated into the metropolitan area. By the fourth quarter of 2023, the apartment vacancy rate had slightly decreased to 8.0 percent from 8.1 percent in the same quarter of 2022, as reported by CoStar Group. The average rent for an apartment rose by \$107, or 8 percent, to \$1,403 from the previous year, although this figure remains below the peak of \$1,516 recorded in the fourth quarter of 2018. Average asking rents for one-, two-, and three-bedroom apartments were \$1,226, \$1,526, and \$1,960, respectively, indicating increases of 9, 7, and 10 percent compared to the same period a year prior. The vacancy rates for these apartments decreased slightly, with one-bedroom units at 8.0 percent, two-bedroom units at 8.0 percent, and three-bedroom units at 7.5 percent, down from 8.1, 8.1, and 7.6 percent, respectively. Multifamily permitting has recently decreased after a period of sustained elevated construction activity, with no multifamily permits issued during the 12 months ending February 2024, compared to 160 units in the previous 12 months (Council For Community and Economic Research).

The issue of housing affordability can indirectly create conditions for housing discrimination, making it challenging to discuss barriers to fair housing without simultaneously addressing the need for policies and initiatives aimed at increasing the availability of affordable housing. This analysis specifically targets the affordability challenge. In Midland, there is a relatively even distribution of low- to moderate-income households across different ethnic groups, all of which encounter difficulties in purchasing homes. Low-income families face considerable financial strain in the rental market. To effectively create affordable housing, incentives must be structured to be both rigorous enough to ensure the desired outcomes and attractive to developers. Given the current economic climate and the existing housing development constructure in the city, instances of discrimination are likely to be concentrated in the rental market, necessitating immediate efforts to address these issues, particularly for certain groups within the federally protected classes. One key area of focus should be the challenges faced by disabled individuals, who often struggle to

find suitable accommodations due to a limited number of accessible units and the high costs associated with building or modifying homes. There is a notable prevalence of family households, which tend to be slightly larger than the national average, indicating a demand for larger living spaces. Midland County is an amalgamation of complex issue shaped by economic, regulatory, and market dynamics that disproportionately affect low- to moderate-income households across different ethnic groups.

The sales market is currently experiencing tight conditions, characterized by a vacancy rate of just 1.5 percent. This figure underscores a competitive environment for both buyers and sellers, reflecting a slight drop from the 1.6 percent seen in April 2020, which suggests a steady demand for homes. Although the inventory supply increased to 2.4 months in February 2024 from 2.0 months in February 2023, indicating a marginal easing in availability, the market still favors sellers. In terms of home sales trends, there has been a noticeable 14 percent decline, with only 4,025 homes sold by the end of January 2024, pointing to a slowdown. However, the 3 percent increase in home prices indicates that demand is robust enough to sustain price growth. For buyers, this means acting swiftly when a suitable home is found, while sellers might find it an opportune time to list their properties (Council For Community and Economic Research).

New developments like Mockingbird Ridge in Midland are shaping the future housing landscape, with plans for 2,000 homes by 2030. This development promises modern, spacious living options at competitive starting prices, appealing to families looking for new opportunities. The apartment market is also well-balanced, with vacancy rates slightly decreasing to 8.0 percent. Additionally, average rent has risen by 8 percent to \$1,403, reflecting a strong rental market driven by factors such as the recovery of the oil industry. This situation presents a lucrative opportunity for investors to consider rental properties as a viable investment. While the market is tight, some experts believe that rising interest rates could temper demand, leading to a more balanced market in the future. Conversely, others argue that sustained economic growth, especially from the energy sector, will maintain the market's competitiveness. Addressing these challenges requires collaborative efforts among local governments, developers, and community organizations to develop more inclusive and affordable housing solutions. For buyers, monitor inventory levels to time your purchase wisely, sellers consider listing your property while the market remains favorable. Other strategies may include the continual

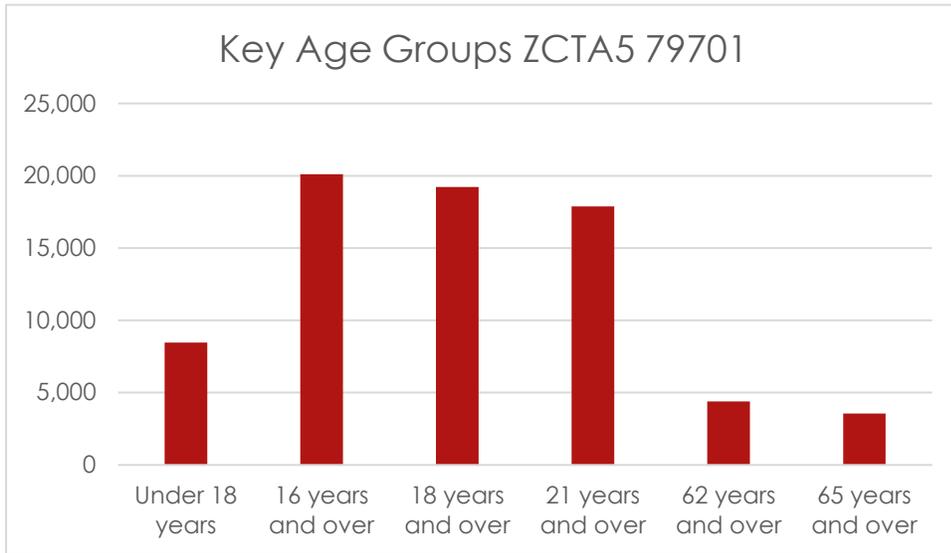
revising of zoning laws, incentivizing affordable housing developments, and enhancing access to financing for low- to moderate-income families.

Households earning between \$35,000 and \$49,999 usually represent working-class families, often working hard to balance their expenses and savings. In the income range of \$50,000 to \$74,999, families generally experience a more stable economic condition, allowing for improved living standards. Those in the \$75,000 to \$99,999 bracket tend to enjoy a comfortable lifestyle, while individuals and families earning between \$100,000 and \$149,999 typically represent middle to upper-middle-class households that contribute positively to the local economy. Furthermore, families with incomes between \$150,000 and \$199,999 are considered affluent, possessing significant disposable income, and high-income earners making \$200,000 or more often include professionals and business owners who play a crucial role in the local economic landscape. The 2024 ACS Survey data reported the following median household incomes for Midland, which closely reflects the State and National median household income figures:

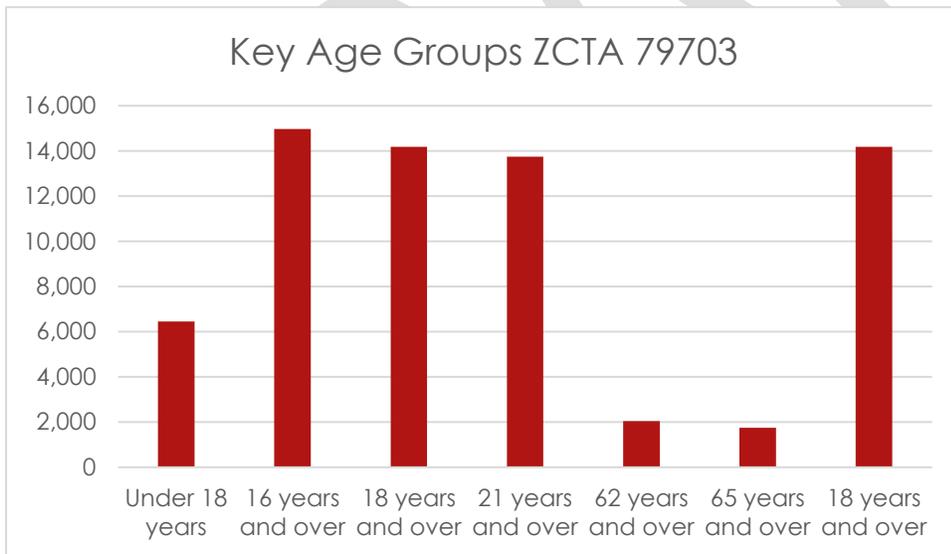
Median Household Income:	\$93,844
Median Social Security Income	\$21,600
Median Social Security (SSI)	\$10,968
Temporary Assistance (TANF)	\$14,400
Supplemental Nutrition (SNAP)	\$5,031

The 2024 American Census Survey estimated the city's housing count was 73,673 and multi-family units comprise approximate 4,208 of the housing stock. In 2025, the housing issue is expected to remain a challenge as oil prices steadily fluctuate between at \$65.22 to \$87.67 based upon the previous fifty-two-week range (2023-2024 American Census Survey). Texas A & M University shows that the inventory of homes for sale remain at an average of 49 days in the first quarter of 2025. Buyers have been at a disadvantage for several years and the trend do not appear to subside soon. The Consolidated Plan reports, "It is still a seller's market in Midland, which hinders purchases by low-income buyers, as the median sales price is hovered at \$311,884, up 5.1% from 2024 (Texas Real Estate Research Center at Texas A&M University). This is more than four times the annual income of a four-person low-income household." Low-income

households also have a difficult time obtaining decent affordable rental housing in Midland.



American Community Survey Midland Zip Code 79701 Housing Estimates in the Past 12 months



American Community Survey Midland Zip Code 79703 Housing Estimates in the Past 12 months

The Median Rent Value by Census Tract Map highlights tracts where rent was greater than the city average. The Median Value of Owner Housing by Census Tract reflect persons in poverty by tracts relative to the city's median value. The housing assistance needs being developed in the City's 2025-2030 Consolidated

Midland TX - Inventory of Affordable Housing Properties, 2025

Development	Address	1Bdrs	2Bdrs	3+bdrs	Total units	Affordable units	Population Served	Disabled units	Occupancy
Scharbauer Flats	1915 E. Scharbauer Dr	84	108	108	300	300	Income Based	21	90%
Village Square	1710 N "A"	18	39	0	57	57	General	0	100%
Chaparral Apartments	4201 N Garfield	48	52	24	124	124	General	0	100%
Hillcrest Manor	700 W. Scharbauer	94	4	0	98	98	Elderly Disabled	14	100%
Ranchland	1212 E Wadley	84	120	0	207	74	General	5	92%
Langtry Village	2200 N Pecos	84	0	0	84	84	Elderly Disabled	5	100%
Parker Place	508 E Parker	40	0	0	40	40	Elderly	4	100%
The Zone	2800 W Illinois	19	20	0	39	39	General	1	100%
Park Glen Apartments	2300 Camp Drive	42	72	46	160	160	General	10	85%

Santa Rita Apartments	1900 E. Golf Course Rd.	112	28	0	136	136	Elderly	0	85%
Sterling Springs Apartments	1701 Fairgrounds Road	28	28	40	96	96	General	9	85%
Constellation Ranch Apartments	1301 Latta	16	72	48	136	130	General	10	100%
Gateway Plaza	1701 Tradewinds Blvd	not verified	not verified	0	96	95	General	0	85%
Playa Del Pueblo	611 E I20	12	48	36	96	96	General	7	100%
Pine Hurst	609 Watson	19	18	9	46	46	General	0	95%
Courtyard	2300 N. A Street	NA	NA	NA	NA	NA	NA	NA	95%
Hyde Park	3329 W. Wadley Ave	30	60	30	120	120	General	NA	95%
Waterford Lakes	516 N. Loop 250 W	NA	NA	NA	NA	NA	NA	NA	95%
Summerhill	3001 N. Midland Dr.	88	42	0	128	128	General	NA	95%

Northridge Court	3417 N. Midland Dr.	280	60	40	384	348	General	NA	95%
Renew Andrews	1902 N. Midland Dr.	106	106	0	212	212	General	NA	95%
Newport	5244 W. Loop 250 N	148	148	0	296	296	General	NA	95%
Renew Andrews-2	4400 Midland Dr.	106	106	0	212	212	General	NA	95%
Westridge	5200 Graceland	56	40	0	96	84	Elderly	5	85%
Alturas Andrews	4201 Andrews Hwy	93	0	0	93	47	General	NA	85%

The Median Rent Value by Census Tract Map highlights tracts where rent was greater than the city average. The Median Value of Owner Housing by Census Tract reflect persons in poverty by tracts relative to the city's median value. The housing assistance needs being developed in the City's 2025-2030 Consolidated Plan anticipates and or reveal that low-income households with structure prior to 1985 are prone to structural problems and dilapidation forcing municipalities to take adverse actions with the homeowner/renter. Some household groups do reflect a disproportionate need for affordable home repairs and new construction yet lack the income to make proper repairs. A disproportionate need is when a percentage of persons in an ethnic category of needs are also a member of a particular racial or ethnic group that is at a minimum of ten percentage points higher than the persons in the category. The following categories meet the criteria and are disproportionate need categories:

- Lacks complete kitchen, bath, and or sleeping facilities.
- Lacks complete plumbing or inoperable facilities.

- More than two persons per room.
- Cost Burden greater than 30% of poverty index

Overall, Midland County faces a lower 10.9% poverty rate than the Texas average 14.0%, percentage of the population living below the poverty line. This economic strain is compounded by the alarming percentage of children in Midland who live in families with incomes below or just above the poverty line, which can have long-lasting effects on their education and health outcomes. Midland County showcases a diverse income distribution, with a considerable segment of the population experiencing economic challenges. Understanding these dynamics is essential for local policymakers and community organizations aiming to enhance economic conditions and support vulnerable populations in the region

AREAS OF MINORITY AND /OR LOW-INCOME CONCENTRATION

The examination of demographic data does not definitively indicate housing discrimination within protected classes. However, statistical information can be valuable in highlighting issues such as poverty, the composition of families and households, the needs of disabled individuals and special populations, as well as the circumstances of elderly disabled persons. Understanding the racial composition and changes over time provides insights into the community's dynamics. Examining the population, housing, special needs characteristics and trends in the city that may affect equal housing opportunity. This Community Profile provides insights for identifying potential impediments to fair housing choice. While not definitive indicators of impediments to fair housing choice in and of themselves, the data may point to conditions or situations that could be indicators of impediments to fair housing choice. "In 2023, Texas had a population of 29.6M people with a median age of 35.5 and a median household income of \$76,292.

Between 2022 and 2023 the population of Texas grew from 29.2M to 29.6M, a 1.36% increase and its median household income grew from \$73,035 to \$76,292, a 4.46% increase (U. S. Census 2023-2024)The 5 largest ethnic groups in Texas are White (Non-Hispanic) (39.9%), Two+ (Hispanic) (16.3%), White (Hispanic) (14%), Black or African American (Non-Hispanic) (11.9%), and Other (Hispanic) (8.22%). The racial composition of Midland with that of Texas, demonstrate significant racial diversity in the city. Midland has a higher percentage of White persons than the State. The percentage of African Americans is below that of the State.

The percentage of Hispanic Americans is slightly higher than the state average. Midland's majority population and minority population statistics are presented on the General Population and Housing Data Table (U. S. Census 2023-2024).

While the percent of population was relatively unchanged from 2020 to 2024 several race groups showed unchanged or slight increases greater than the city's overall growth rate from prior years: White Non-Hispanic (55.3%), Hispanic-Latino (of any race) (47.1%) Two+ (Hispanic) (36.5%), White (Hispanic) (6.9%), and Other (Hispanic) (3.7%), Black or African American (Non-Hispanic) (8.2%), Asian and Pacific Islanders (2.4%). The share of homes in the Midland area where a language other than English is spoken is slightly higher than the rest of the state. The area has a percentage of people who speak English less than "very well" for Midland MSA (40.0%) vs. in Texas (37.2%) (datausa.io).

Public (PHA) Housing Programs

Two public housing authorities (PHA) operate in Midland; the City of Midland Housing Authority that was established in 1971 and primarily serve seniors and disabled adults. The Midland City Council appoints the City Housing Authority Board of Commissioners, otherwise the City Housing Authority is independent of the City. The Midland County Housing Authority that was created in 1988 by the Midland County government. The County Commissioners Court appoints the County Housing Authority Board of Commissioners; likewise, the County Housing Authority is also independent of the County government. Two PHA's operates within Midland County serving 1,081 rental vouchers to families with children and 183 Units of Hillcrest Manor apartments, and Langtry Village apartments combined. The Inventory of Affordable Housing Properties identifies the publicly supported rental properties in Midland. The name, the number of units, the population served, and the number of units designed for disabled persons are shown on the Table.

Properties listed include recent Low Income Housing Tax Credits complexes. Information from the new Five Years Consolidated Plan covering the October 2025 to September 2030 submitted by the City to HUD reveal the following number of minorities served by each program. It should be noted that CDBG supported activity that meet federal requirements, may be limited to areas of a higher percentages of low and moderate-income persons. These properties are generally within census tracts that often mirror city's minority concentrated areas. Over the past five years, the city's housing programs have not been the

subject of discrimination complaints. Both PHAs must administer the rental assistance programs consistent with the Fair Housing Act.

Race	City Public Housing	City Public Hispanic	Midland County PHA				
			Voucher	Elderly	Hispanic	FUP	Disabled
White	62	38	521	121	403	8	140
Black/African American	73		550	71	49	16	105
Asian	0	0	1	1	0	0	0
American Indian/Alaska Native	0	0	4	0	0	0	0
Native Hawaiian/ Pacific Islander	0	0	5	0	5	0	1

The Community Development Block Grant (CDBG) supported activities are required to target areas with a significant percentage of low and moderate-income individuals in order to comply with federal regulations. These areas frequently overlap with the city's minority concentrated zones. Over the past five years, the city's housing programs have not faced any discrimination complaints, indicating effective compliance with the Fair Housing Act by both Public Housing Authorities (PHAs) that manage rental assistance programs. In the context of other housing initiatives supported by the U.S. Department of Housing and Urban Development (HUD) in Midland, there is evidence of alignment with fair housing objectives, as minority households have not been systematically excluded from these programs. A worker earning the mean renter wage requires only 1.5 jobs at the prevailing wage rate to afford an apartment, whereas a minimum wage worker would need to hold 2.9 jobs to afford the same housing, highlighting significant disparities in affordability based on

income levels. Regarding the current fair housing status, the City of Midland does not have a fair housing ordinance or resolution. Instead, it directs housing discrimination complaints to the State of Texas or HUD, with the Texas Workforce Commission Civil Rights.

As of November 2024, HUD had not filed any fair housing discrimination charges against the city, and there have been no court orders or sanctions imposed by HUD regarding assisted housing or fair housing remedies in Midland. Furthermore, no lawsuits for housing discrimination have been initiated against the city by the Department of Justice or private entities. In addressing impediments identified in the 2025 Analysis of Impediments (AI), various actions have been taken to achieve the broad objectives set forth in that analysis. The Community Development (CD) staff has engaged in training for fair housing advocacy, made referrals to HUD and local legal aid agencies, and established the Midland Fair Housing Partnership (MFHP), which encompasses members such as the Board of Realtors, the Midland Apartment Association, and the Midland Affordable Housing Alliance. Public awareness initiatives have included low-cost promotions of fair housing regulations, community engagement activities, and celebrations of Fair Housing Month. The CD staff has also worked to prepare households and individuals for housing choices by disseminating information on tenant rights and supporting local financial education programs. Furthermore, efforts to expand housing choices have been realized through the implementation of the City's Consolidated Plan, involving housing programs coordinated by the CD Division and the acquisition or transfer of land to local non-profit affordable housing agencies as appropriate.

Fair Housing & Schools Performance Data

Midland Independent School District (MISD) has recently celebrated notable achievements among both elementary and high school students, reflecting strong academic engagement and support from the community. However, student performance and opportunity are also shaped by broader city dynamics—particularly those related to fair housing and equitable school resources. MISD's high schools have produced outstanding graduates, with 23 top-performing seniors honored in 2025. These students, recognized at the annual Shining Stars Breakfast, were celebrated not just for their exceptional GPAs but also for their involvement in extracurriculars and leadership roles. Each was awarded scholarships between \$2,000 and \$5,000, underscoring the district's commitment to rewarding academic achievement. The event also

highlighted the influential role of dedicated teachers, further reinforcing the supportive educational environment for schools such as Alamo Jr. High which has been recognized as "Campus of the Year." These awards reflect an environment where teacher innovation and student progress are prized. The consistent acknowledgment of both veteran and rookie teachers points to a culture of professional growth and mentorship at the elementary stage.

While these achievements are commendable, student success is closely linked to access to stable, fair housing. In Midland, as in many American cities, neighborhoods with better housing options often correlate with schools that have greater resources, higher test scores, and more extracurricular opportunities. Conversely, areas with housing instability or economic challenges can see lower performance due to fewer resources and higher student turnover. This structural reality means that while individual achievements shine, disparities may persist citywide. Community engagement plays a crucial role in bridging gaps. Corporate and philanthropic sponsors have contributed significantly to supporting educators and schools through events, scholarships, and program funding. These partnerships help mitigate some inequities by providing additional resources to schools and students who might otherwise lack them.

Alternative opinions note that high-achieving students from underprivileged backgrounds prove that effective interventions and dedicated educators can overcome some housing-related barriers. However, rare cases of resource-rich schools in lower-income neighborhoods demonstrate that targeted investment can sometimes flip expected outcomes. In terms of fair housing and educational performance, it is essential that affordable housing options are available near public schools. The Texas Education Agency (TEA) assigns accountability ratings to districts and campuses based on performance metrics, with a "Met Standard" rating representing acceptable performance. New single-family housing constructed or substantially modified with HUD funding or city-supported activities generally complies with state viability standards, ensuring accessibility for individuals with disabilities. Recently, Midland Independent School District (MISD) has been proactive in sharing its internal calculations of accountability ratings for the 2023-24 school year, despite delays in the official ratings release due to a temporary restraining order affecting the TEA. MISD's projections for the 2023-24 school year indicate an overall rating of C (71 out of 100), with notable gains in campus ratings compared to previous years (Texas Education Agency (TEA))

Specifically, the number of campuses rated A and B has increased, while the overall performance has shown improvement, with 66% of campuses maintaining or improving their overall rating score. Notably, 31% of students are now in A/B rated campuses, an increase from 14% the previous year. However, three campuses are projected to receive an "F" rating due to the "forced F" rule, which caps the highest score a campus can achieve under certain conditions (Texas Education Agency (TEA)). MISD Superintendent Dr. Stephanie Howard expressed pride in the improvements across many campuses and emphasized the district's commitment to continuous improvement and academic excellence, regardless of the challenges posed by rating delays. While significant strides have been made in both fair housing compliance and educational performance in Midland, ongoing efforts are necessary to further enhance accessibility, affordability, and academic achievement across the community.

Texas Academic Performance Report (TAPR) for Midland Independent School District

The Texas Academic Performance Reports (TAPR) compile comprehensive data on student performance in each school and district in Texas annually, detailing information by student groups like ethnicity and socioeconomic status. These reports also offer insights into school staff, programs, and student demographics but don't draw explicit conclusions or recommendations. Instead, they present detailed statistics and comparisons with district and state averages concerning academic performance, attendance, graduation rates, staff, and student demographics for Midland ISD. In essence, TAPR serves as a treasure trove of educational data, painting a picture of how schools and districts across Texas are performing. Every year, it breaks down the performance of students into various groups, which helps highlight disparities and achievements among different demographics. Analyze trends over multiple years help identify consistent patterns or anomalies that allow for educators to focus on specific student groups to target interventions effectively. For instance, by examining data through the lenses of ethnicity and socioeconomic status, schools can identify specific areas needing improvement or celebrate successes. TAPR doesn't make direct conclusions, it's pivotal for administrators and policymakers who use this data to inform decisions and strategies. This makes it a critical tool for fostering educational equity and excellence across the state.

The 2023-24 Texas Academic Performance Report (TAPR) for Midland Independent School District offers a comprehensive analysis of the district's academic performance, highlighting the results of the State of Texas Assessments of Academic Readiness (STAAR) and special education status. This report provides insights into performance rates across subjects, grades, and demographic groups, offering a nuanced look at educational outcomes and areas for improvement. The STAAR Performance Overview: The report details Midland ISD's STAAR performance across grades and subjects, categorizing achievements into "Approaches," "Meets," and "Masters" grade levels. For example, Grade 3 reading showed a slight decline from 76% at the "Approaches" level in 2023 to 74% in 2024, while Grade 3 mathematics indicated a small improvement in students meeting grade level expectations.

Conversely, Grade 4 reading saw an increase in performance, while Grade 4 mathematics reflected a slight decrease. These trends highlight the fluctuations in academic achievement, underscoring the need for targeted interventions in certain areas. School Progress in Annual Growth: The report also highlights annual growth rates across subjects and grades. Notable improvements include Grade 4 and 5 ELA/Reading, while declines are observed in Grade 6 and 7 Mathematics. These data points suggest that while some areas are showing encouraging progress, others require focused support to improve student outcomes (The State of Texas Assessments of Academic Readiness (STAAR)).

Accelerated Learning Trends indicates generally lower performance rates in 2024 compared to 2023. While Grade 4 ELA/Reading showed improvement, other areas, such as Grade 7 Mathematics, saw declines. This calls for an evaluation of accelerated learning programs to enhance their effectiveness. Bilingual Education and ESL programs showed mixed results, with a slight decline in overall bilingual education participation but notable increases in monitored and former English Language Learners (EB/EL). Graduation Rates and Demographics boasts a graduation rate of 90.3% for the class of 2023, with Hispanic students performing well. However, African American and economically disadvantaged students face challenges, emphasizing the importance of tailored support to improve outcomes for these groups. Career Readiness and CTE programs and technical education (CTE) programs see solid participation, with 23.5% of graduates completing CTE courses. The district reportedly aims to increase this percentage to better prepare students for the workforce (The State of Texas Assessments of Academic Readiness (STAAR)).

Alternative assessments and perspectives are often at the foundation for positive achievement, as well as socio-emotional support as integral components of student success. Programs that address these areas could complement traditional academic interventions. Additionally, college, career, and military readiness have showed significant improvements and are noted in college, career, and military outcome metrics, particularly among different demographic groups. The overall readiness rate increased to 77.0% in 2022-2023, demonstrating successful efforts in preparing students for post-secondary pursuits. Midland ISD's teaching workforce is composed of experienced professionals, with an average of 11.5 years of teaching experience. However, the teacher turnover rate of 22.9% is higher than the state average, suggesting a need for strategies to retain quality educators.

There are likely actionable steps for improvement which focus on targeted interventions in subjects with declining performances. The annual growth data reveals both bright spots and areas needing attention. For instance, improvements in Grade 4 and 5 ELA/Reading show promise, suggesting effective teaching strategies or curriculum adjustments. However, the declines in Grade 6 and 7 Mathematics indicate potential challenges that might require a detailed review of instructional methods or resource allocation. Mixed results in bilingual and ESL programs also suggest a need for nuanced strategies. While there's an increase in monitored and former EB/EL students, the slight decline in overall bilingual education participation points to potential gaps in program engagement or access (State of Texas Assessments of Academic Readiness (STAAR)).

PRIVATE LOAN MARKET BARRIERS THAT DISCOURAGE HOMEOWNERSHIP

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and was implemented by the Federal Reserve Board's Regulation C. On July 21, 2011, the rule-writing authority of Regulation C was transferred to the Consumer Financial Protection Bureau (CFPB). This regulation provides the public loan data that can be used to assist: This regulation applies to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions. Using the loan data submitted by these financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate tables for each metropolitan statistical area (MSA) or metropolitan division (MD) (where appropriate), and individual institution disclosure reports (Home

Mortgage Disclosure Act). Since July 21, 2011, the Consumer Financial Protection Bureau (CFPB) has held the rule-writing authority for Regulation C. This regulation mandates certain financial institutions, including banks, savings associations, credit unions, and other mortgage lenders, to submit detailed loan data. The Federal Financial Institutions Examination Council (FFIEC) then uses this data to create aggregate tables for each metropolitan statistical area (MSA) or metropolitan division (MD), along with individual institution disclosure reports.

HMDA data provides some insight into the lending patterns that exist in a community. However, HMDA data is only an indicator of potential problems; the data cannot be used to conclude definite redlining or discrimination practices. Two types of purchase financing—conventional and government-backed—are examined, as well as refinancing and home improvement loans. Conventional financing refers to market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. Several federal government agencies offer loan products that have below-market interest rates and are insured by the agencies. Sources of government-backed financing include the Federal Housing Administration, the Department of Veterans Affairs, and the Rural Housing Services/Farm Service Agency (RHA/FSA). Loans backed by local jurisdictions (such as silent second loans by cities and counties) are not covered under HMDA (consumerfinance.gov).

Government-backed financing refers to loans offered at below-market interest rates that are typically issued by private lenders and are guaranteed by federal agencies. These loans are offered to lower and moderate-income households who may have difficulty in obtaining home mortgage financing in the private market due to income and equity issues. Several federal government agencies offer loan products that have below-market interest rates and are insured by the agencies. Sources of government-backed financing include the Federal Housing Administration, the Department of Veterans Affairs, and the Rural Housing Services/Farm Service Agency (RHA/FSA). Government-Backed Loans: Supported by federal agencies and offered at below-market rates, often to help lower-income households. One can use the data to identify patterns in lending practices. Loans backed by local jurisdictions (such as silent second loans by cities and counties) are not covered under HMDA.

HMDA data provide some insight into the lending patterns that exist in a community. However, HMDA data is only an indicator of potential problems; the data cannot be used to conclude definite redlining or discrimination practices. In the format provided on the Website, HMDA data lack the detailed information on loan terms or specific reasons for denial to make conclusive statements.

Conventional financing involves market-rate loans from private lenders, while government-backed loans provide below-market interest rates and are often backed by federal agencies, aimed at assisting lower and moderate-income households. To support fair housing choices, the Community Reinvestment Act (CRA) was enacted in 1977, encouraging financial institutions to meet the credit needs of their communities, including low and moderate-income areas. HMDA requires financial institutions with assets over ten million dollars to report detailed home loan data, which is evaluated to assess lending patterns. Several organizations play roles in monitoring real estate industry practices and ensuring compliance with fair housing laws. The FFIEC, for example, prescribes uniform principles and standards for examining financial institutions and prepares Community Reinvestment Act rating reports. Meanwhile, the National Association of Realtors (NAR) and the Texas Association of Realtors (TAR) emphasize ethical practices and offer diversity training to their members. The Texas Real Estate Commission is responsible for licensing real estate professionals, enforcing education requirements, and maintaining industry standards.

POLICY IMPROVEMENT NEEDED FOR DIVERSE COMMUNITY REPRESENTATION

To enhance housing choices in Midland, Texas, it is essential to promote the construction of affordable and rental housing options specifically tailored for disabled individuals and families with children. A critical step in this process involves engaging stakeholders by organizing focus groups that include advocacy organizations, community groups, real estate professionals, lenders, property owners, and government officials. These discussions aim to evaluate fair housing issues, identify discriminatory practices, and develop strategies to address them, ultimately fostering a collaborative approach to meeting the housing needs of vulnerable populations. Current observations indicate that Midland's housing market has experienced fluctuations in demand due to economic factors, leading to a scarcity of affordable options.

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Moreover, there is a significant lack of accessible housing for individuals with disabilities, which restricts their choices. Families with children and disabled individuals often require specific amenities, such as wheelchair accessibility, proximity to schools, and access to public services; however, many existing housing developments fall short of meeting these needs due to outdated designs or insufficient planning for accessibility.

There is a noteworthy absence of coordinated efforts among stakeholders, including advocacy organizations, real estate professionals, and government officials—to effectively tackle fair housing issues. This lack of collaboration hinders the identification and resolution of housing needs. Funding and resources also present a challenge, as limited funding opportunities for affordable housing projects make it difficult to develop and maintain quality housing options. Existing programs often do not adequately address the specific needs of disabled individuals and families with children. To address these challenges, several recommendations can be implemented. First, establishing regular focus groups involving stakeholder organizations will facilitate ongoing discussions about fair housing issues and the needs of vulnerable populations. Second, conducting comprehensive needs assessments in collaboration with stakeholders will help gather data to inform policy changes and development strategies. Promoting inclusive housing development is also crucial; this can be achieved by incentivizing developers to incorporate universal design principles in new construction projects and advocating for zoning reforms that allow for the development of mixed-use housing that includes affordable units designed for families and individuals with disabilities.

Third, increasing funding opportunities is vital; local governments should work to access state and federal funding programs aimed at affordable housing, such as Low-Income Housing Tax Credits (LIHTC) and Community Development Block Grants (CDBG). Furthermore, fostering public-private partnerships can also help share costs and resources for building affordable and accessible housing. Integrating wraparound support services, such as childcare, transportation, and healthcare within housing developments, can greatly enhance the quality of life for families and disabled individuals. Creating dedicated housing trust funds and land banks focused on affordable housing development for disabled individuals and families with children is another significant strategy. These funds can provide grants or low-interest loans to developers committed to building accessible units.

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Utilizing available federal and state resources effectively will address critical housing needs, including rehabilitation and preservation of existing units. Collaborating with community organizations and advocacy groups can further increase the availability of accessible housing and encourage the development of a diverse range of housing types at various price points.

Ultimately, it is essential to monitor and evaluate progress toward increasing the availability of affordable and accessible housing. Setting clear, measurable goals and instituting a reporting system will allow for regular assessment of progress and necessary adjustments based on community feedback and changing needs. By engaging stakeholders, promoting inclusive housing development, increasing funding opportunities, enhancing support services, creating dedicated funds, and monitoring progress; Midland can significantly improve housing choices for disabled individuals and families with children. This comprehensive strategy aims to foster a more equitable and diverse housing landscape that meets the needs of all community members.

OVERSIGHT & GOVERNANCE POLICIES

The city is committed to fostering public-private partnerships aimed at developing land and housing that are accessible to a diverse population. This initiative will involve collaboration with contractors, non-profit housing organizations, and community development corporations. The Community Development Division will work to ensure that municipal zoning and construction codes are in line with the Americans with Disabilities Act (ADA) to enhance accessibility for individuals with disabilities. Additionally, this division will strive to simplify the review and approval processes for new construction and home modifications within areas targeted by the Community Development Block Grant (CDBG) program. The city will also promote the principles of universal design in new housing projects and ensure that local zoning laws and building codes meet the needs of higher-density housing, individuals with disabilities, and group homes or congregate living facilities.

As previously mentioned, residents of the city are protected from housing discrimination by various laws at the federal, state, and local levels (Texas Property Code 2023). These laws are enforced by agencies across these levels, and individuals have multiple avenues for seeking help if they believe they have experienced discrimination. At the federal level, the Department of Housing and Urban Development (HUD) and the Department of Justice (DOJ) hold enforcement responsibilities.

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Complaints can be filed with these agencies, and in certain cases, the DOJ may pursue legal action. Typically, fair housing service providers work in collaboration with HUD and state agencies to address issues. However, if litigation is needed, cases may be resolved through administrative filings with HUD or the state, referred to the DOJ's Civil Rights Division for consideration, or directed to a private attorney for potential legal action. In Texas, the Texas Fair Housing Law offers protections for individuals with disabilities in the sale or rental of housing. This law outlines discriminatory practices and specifies exemptions within the Texas Property Code, Title 15, Chapter 301. According to the Texas Department of Housing and Community Affairs, the Fair Housing Act does not prevent housing denial based on creditworthiness, rental history, or criminal records.

It also does not protect individuals who pose a direct threat to others or their property. Certain exemptions apply, including owner-occupied buildings with a maximum of four units, single-family homes rented or sold without a broker, and housing run by organizations or private clubs that limit occupancy to members. Additionally, housing developments designated for individuals aged 55 or older may be exempt from provisions that prohibit discrimination based on familial status. The Texas law does require housing providers to take necessary steps to enhance accessibility for individuals with disabilities (Texas Property Code 2023). The relationship between landlords and tenants in Texas is governed by various statutes, particularly Chapter 92 of the Texas Property Code, alongside numerous court rulings. This chapter outlines the definitions of rental agreements, as well as the obligations of landlords and tenants, and the enforcement measures and remedies available to them.

Other relevant sections include additional chapters of the Texas Property Code, the Texas Local Government Code, the Texas Health and Safety Code, the Texas Human Resources Code, and the Texas Civil Practices and Remedies Code. Midland currently lacks an active fair housing program, and focus group discussions, along with survey results, highlight a significant gap in knowledge regarding fair housing laws, policies, and practices. This gap underscores an ongoing need for education, awareness, and outreach, particularly among lower-income households and minority communities. To address these issues, several recommendations have been proposed. City agencies, housing advocacy groups, and service organizations should continue and expand their efforts to inform renters and homebuyers about their rights and the recourse available to them in cases of discrimination. Additionally, the City should conduct training sessions and information campaigns aimed at rental property

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owners, managers, apartment owner associations, and management companies to enhance their understanding of fair housing laws.

Moreover, it is essential to convene focus groups comprising advocacy organizations, community-based groups, real estate professionals, lenders, property owners, and government officials to review and assess fair housing issues. These discussions should aim to identify discriminatory practices and trends, as well as develop strategies to address them. Regular updates to fair housing information and strategies are also crucial; therefore, groups that advocate for affordable housing construction and management should meet annually, or possibly biannually. Awareness efforts should be expanded to include school (MISD) programs, like poster and essay contests, coordinated with Fair Housing activities. A dedicated session on fair housing law and practices during a "Housing Summit" would also be beneficial. Collaborating with housing advocacy and non-profit organizations to create homeownership and home maintenance educational programs (Midland Collage BEDC) for first-time homebuyers is vital for preparing them for the responsibilities associated with ownership.

Lastly, it is important to continue and, if possible, expand existing educational programs for households and housing-related organizations. This can be achieved through distributing Fair Housing law literature, conducting seminars and training, and focusing public awareness campaigns on fair housing laws in ethnic and minority neighborhoods, as well as among civic, social, religious, and special interest groups. Providing Fair Housing materials and educational programs in Spanish is particularly important in neighborhoods with a high percentage of Spanish-speaking residents, ensuring that everyone has access to this critical information.

CITIZEN PARTICAPATION PLAN/COMMUNITY GROUP/FOCUS GROUP MEETINGS

Community participation focuses on the characteristics and trends related to population, housing, and special needs within the city that may influence equal housing opportunities. The Community Profile aims to identify potential barriers to fair housing choices. While the data presented are not definitive indicators of such impediments on their own, they may highlight conditions that could suggest barriers to fair housing. The development of the Analysis of Impediments to Fair Housing Choice (AI) follows a collaborative process involving consultation and citizen participation, building upon existing channels for community

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engagement. Citizens, non-profit organizations, and other interested parties were provided various opportunities to engage, including:

- Contributing during meetings, hearings, and planning sessions.
- Reviewing and providing feedback on the participation plan and the AI, along with any related comments.
- Participating in public hearings.
- Commenting on the plan and its amendments.
- Registering complaints regarding the AI and its amendments.

To comply with citizen participation requirements, the city undertook several actions:

- It prepared, adopted, and implemented a Citizen Participation Plan.
- Informational notices about the AI were published.
- Public hearings were conducted in accessible locations at convenient times, with reasonable advance notice.
- The Analysis was made available for public review and comment for 30 days prior to submission to HUD.
- Reasonable access to records of assistance for affordable and supportive housing received by the city over the past five years was provided to citizens, public agencies, and other interested parties.
- The views and comments from citizens were considered and summarized for inclusion with the submission.

As part of the public participation process for the development of the City's 2025-2030 Consolidated Plan and the preparation of an updated Analysis of Impediments, the city convened three focus groups and held a Public Hearing to obtain information on housing discrimination and the needs of low- and moderate-income residents of Midland. The focus/community group meetings were held on March 10, 2025-March 13, 2025. The meetings were held at the MLK Community Center at 2300 Butternut Ln. Casa De Amigos 1100 Garden Ln, Midland Southeast Center 1803 E. Indiana and Midland Senior Center 3303 W. Illinois as part of the outreach process. The schedule was publicized in the

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Midland Reporter Telegram newspaper, on the City's website and through volunteers distributing information prior to the event. Four focus group meetings were held, inviting representatives from lending and financial services, community service organizations, housing developers, housing advocacy groups, and government officials. A brief presentation about the Consolidated Plan and the Analysis of Impediments to Fair Housing Choice was made to each focus group, and an invite was made to attend and participate in the two (2) Public Hearing; there open discussions of needs and priorities were heard.

The Community Development Division organized two public hearings on June 10, 2025, and June 24, 2025, to discuss the fundamental elements of the AI, allowing attendees to ask questions and provide comments. The City's survey was conducted to determine the extent to which impediments to housing may be measured from a community perspective; whether intentional or unintentional. This survey helped to identify the impediments to fair housing choices that exist in Midland as evidenced by residents and what the nature of those impediments. The survey was available at senior centers, neighborhood centers, and city webpages. was available at the focus group meetings. Focus group attendees and staff were encouraged to advise other (individuals, families, organizations, etc.) to take the survey. Respondents were asked to identify which priorities and issues were of most to least significant. The city received 27 responses of 90 survey responses described below may not always reach this total, as some respondents skipped questions. On August 12, 2025, the City Council approved the Analysis of Impediments to Fair Housing Choice and adopted a Resolution of Authorization, subsequently forwarding the document to the HUD Regional Office.

SUMMARY

The citizens of Midland are protected from discrimination through states and local legislation and policies influencing the housing market. The federal Fair Housing Act serves as the foundation for fair housing policy in the United States, prohibiting discrimination on the bases of race, color, sex, religion, national origin, disability, and familial status. State law extends protections to Texans based on these same attributes; yet we must remain vigilant in rooting out housing discrimination. Illegal housing discrimination continues and may be manifested though covert actions. The City of Midland and the Community Development Office will continue to promote and advocate for fair housing and fair lending practices.

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METHODOLOGY KEY DATA SOURCES USED TO COMPLETE THIS (AI):

- U.S. Census and the American Community Survey
- The City's Consolidated Plan, 2025-2030 and the 2023 CAPER
- Comprehensive Housing Affordability Strategy (CHAS) Data from HUD
- Housing and Urban Development (HUD) Office of Policy Development and Research (HUD PD&R)
- Home Mortgage Disclosure Act (HMDA) Data
- Housing and Urban Development (HUD), Fair Housing and Equal Opportunity Complaint Data
- CoreLogic, Inc.
- Consumerfinance.gov
- City of Midland 2020 Analysis of Impediments to Fair Housing Choice
- Lanier Real Estate, LLC
- Texas Railroad Commission
- Realtor.com
- Council For Community and Economic Research
- Real Estate Center at Texas A & M University
- Datausa.io
- Texas Property Code
- Texas Real Estate Commission
- Texas Association of Realtors (TAR)
- Texas Real Estate Research Center at Texas A&M University
- National Association of Realtors (NAR)
- Home Mortgage Disclosure Act (HMDA)
- Federal Financial Institutions Examination Council (FFIEC)
- Consumer Financial Protection Bureau (CFPB)
- Center for Housing Policy
- Midland County Foreclosure Archives
- Community Reinvestment Act (CRA)
- Community Reinvestment Act (CRA)
- City of Midland/Midland County Housing Authority
- City of Midland Comprehensive Plan (Tall City Tomorrow)
- Midland Odessa Urban Transit Board
- Texas Education Agency
- CoStar Group