



**HOUSING & COMMUNITY DEVELOPMENT ACT COMMITTEE**

Tuesday, June 27, 2017

7:00 pm

Lorraine H. Morton Civic Center, 2100 Ridge Avenue  
Room 2402

**AGENDA**

- I. CALL TO ORDER / DECLARATION OF QUORUM**
  
- II. APPROVAL OF MEETING MINUTES FOR MARCH 21, 2017**
  
- III. ALLOCATION OF ADDITIONAL FY2017 CDBG FUNDS**
  
- IV. PUBLIC COMMENT**
  
- V. STAFF REPORTS**
  - a. CHICAGO-COOK COUNTY ASSESSMENT OF FAIR HOUSING**
  - b. 2018 CDBG APPLICATION PROCESS**
  
- VI. ADJOURNMENT**

The next meeting of the Housing & Community Development Act Committee is scheduled for Tuesday, July 18, 2017 in Room 2402.

***Order of agenda items is subject to change***

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**MEETING MINUTES**

**HOUSING & COMMUNITY DEVELOPMENT ACT COMMITTEE**

Tuesday, March 21, 2017

7:00 P.M.

Lorraine H. Morton Civic Center, 2100 Ridge Avenue, Room 2402

Members Present: Ald. Rainey, Ald. Braithwaite, Ald. Holmes, Ald. Wilson, C. Goddard, G. Mackey, M. Miro, S. Jones, J. Sanke

Members Absent: Ald. Miller

Presiding Member: Ald. Rainey, Committee Chair

Staff: S. Flax

**Call to Order / Declaration of Quorum**

Chair Rainey declared a quorum of the Housing and Community Development Act Committee and called the meeting to order at 7:05 pm.

**Approval of Meeting Minutes for November 15, 2016**

Ald. Wilson moved approval of the minutes as presented, Ald. Holmes seconded the motion and it was approved unanimously.

**Public Input on the Draft 2016 Consolidated Annual Performance and Evaluation Report (CAPER)**

Chair Rainey opened the floor for input on the draft 2016 CAPER and asked if any of the people in attendance wished to comment. None wished to comment on the CAPER, but did want to comment on a development project proposed for the corner of Dempster and Pitner. Ald. Rainey requested that comments unrelated to the CAPER be held until agenda item VI. Other Public Comment and asked staff to summarize any comments received in writing on the CAPER for the committee.

Staff distributed copies of input received from Judy Malik in two emails on March 16 and 17, 2017. Ms. Malik claimed that African-Americans are not receiving assistance to enable them to continue to live in Evanston while immigrants and refugees are being welcomed. It was surmised that this is based on the City's Welcome City Ordinance 156-O-16, which states that the City welcomes diversity and believes all individuals living in or visiting Evanston should be treated fairly and with respect and dignity and the Refugee Task Force, made up of staff from the City, federal resettlement agencies, Evanston's school districts, Northwestern University and other non-profits that was convened by the City to coordinate efforts to assist approximately 70 families that have been placed in Evanston through the federal refugee program. It was noted that the City lacks the resources to address all needs, but continues to strive to address the needs of low and moderate income Black/African-American residents, as can be seen in section CR-10 – Racial and Ethnic composition of families assisted, of the CAPER.

Black/African-American residents comprise 59% of people assisted with CDBG, 60% of people assisted with HOME, and 65% of people assisted with ESG. Ms. Malik's email included a comment that Alderman Wilson did not file a case against Hirsch Management on her behalf. Alderman Wilson responded to this, informing the committee that at the request of a resident of his ward who is a friend of Ms. Malik's, he worked with Open Communities, with whom the City contracts for Landlord-Tenant services, to get her full security deposit refunded by Hirsch Management in addition to interest that had been refunded. He did not offer to file a case on her behalf and there were no grounds for any case. Ald. Rainey commended Ald. Wilson for resolving this issue on behalf of Ms. Malik and noted that no additional action was needed.

Chair Rainey again asked the people present if they wished to provide input on the CAPER and hearing none, closed the public comment period.

**Vote to recommend Approval of CAPER by City Council at March 27, 2017 Meeting**

Ald. Holmes moved that the committee recommend approval of the draft 2016 Consolidated Annual Performance and Evaluation Report to City Council at the March 27 meeting, Ald. Braithwaite seconded the motion and it was approved unanimously.

**Request for Housing Opportunity Development Corporation for Housing Rehab Assistance for 743 Brummel Street, a 13-unit Affordable Rental Project**

Ald. Rainey asked staff for a summary of the project request. Staff described Housing Opportunity Development Corporation's (HODC) need to replace the roof of its 13-unit affordable rental building at the corner of Brummel Street and Elmwood Avenue and recommended a \$50,000 rehab loan from the City's Housing Rehab program. In addition to the roof, HODC wants to install security cameras to enhance the safety and security of residents and the neighborhood. The request is similar to Over the Rainbow's request for help to replace their failed sewer lateral in 2016, as it is an important repair to maintain the structural integrity of the building but does not fit comprehensive rehab requirements for HOME funding. Because all units are rented at affordable rates to households with incomes  $\leq$  80% of the area median (AMI), a deferred loan, payable in full if the property is sold or ceases to be maintained as affordable housing, is recommended because the building's cash flow cannot support additional debt service when all units are affordable  $\leq$  80% of AMI. This property is an important affordable housing project acquired and rehabbed in part with City HOME funds in 1998. HODC has maintained it as affordable housing beyond the requirements of that funding and intends to maintain all units for households  $\leq$  80% of AMI. HODC would be required to follow Davis-Bacon prevailing wages because the building has more than eight units and HODC has the experience to handle this and other federal requirements. Rose Russo, Asset Management Director at HODC, was introduced to answer any questions from the committee.

Questions included the rationale for security cameras; Ms. Russo cited the benefits of the security cameras at their facility at 319 Dempster and explained that two recent cases of fly dumping at 743 Brummel that could have been resolved with security

cameras, which can be monitored remotely by staff. Ald. Rainey and Mr. Mackey asked if HODC had plans for ongoing maintenance including sprucing up the interior hallways and installing new mailboxes and door buzzers. Ms. Russo responded that following roof replacement, they planned to paint apartments, install new front doors, mailboxes and door buzzers. Ald. Rainey thanked her for that information and noted that HODC was very responsible in maintaining the property overall.

Ald. Holmes moved approval of HODC's request for a \$50,000 loan, Ald. Wilson seconded the motion and it was approved unanimously.

### **Other Public Comment**

Ald. Rainey opened the floor for public comment on items not on the meeting agenda, noting the importance of community forums for topics that impact neighborhoods. Jared Davis, 2303 Dempster Street, read a prepared statement about his and other neighbors' support for the City's good intentions to be a social change leader but voiced concerns with a 16-unit affordable housing project located at the corner of Dempster Street and Pitner Avenue proposed by the City. These include the size of the project, growing residential congestion in the area, safety concerns because Dempster Street is a major truck route and there are blind corners, parking issues, and strain that would be placed on trash and recycling services. Neighbors were made aware of this plan at the 2nd Ward meeting on March 9 and wanted opportunity to voice these concerns. The written statement is appended.

Ald. Rainey responded that this is not a City of Evanston project and asked staff to provide background. Staff explained that Housing Opportunities for Women (HOW) a non-profit that provides supportive housing and services primarily to low income women with children, has applied to the Illinois Housing Development Authority for funding for this project to address growing referrals of residents with children in Evanston schools who are homeless or couch surfing because they are unable to afford housing for their families. The project was submitted for zoning review and is compliant with the site's R-4 zoning, so can be built there, pending receipt of funding. Ald. Braithwaite explained that a meeting about the project was held for neighbors at Erie Health Center on February 23 and another meeting is scheduled for April 25 to provide more information and to respond to questions and concerns raised at the first meeting. An announcement was made at the March 9 ward meeting to make more residents aware of the April 25 meeting.

Discussion about the site's zoning and the deteriorated condition of the single family house on the property followed. In response to a question if HOW owns the site, staff responded that the City does not have that information, however, applications for funding to IHDA require the developer have site control in order to be considered. Often developers have a contract or option to purchase contingent upon funding. Ald. Rainey suggested that Mr. Davis contact HOW directly to get information in advance of the April 25 meeting.

**Staff Reports**

Staff informed the committee that there is no information on the status of the 2017 federal budget. The government is operating under a continuing resolution (CR) that expires on April 28. If a budget is not approved by that date, a partial shut-down of the federal government would result. More attention was being given to the President's 2018 budget, which includes dramatic cuts to domestic spending, including elimination of the CDBG and HOME programs. Historically, CDBG especially has had strong bipartisan support and CDBG and HOME were at level funding in both the Senate and House's bills under consideration by the respective appropriations committees or subcommittees. Staff will continue to monitor information on both the 2017 and 2018 budgets and would provide updates to the committee.

Staff provided the 2017 meeting schedule to committee members, noting that additional meetings may be cancelled if no agenda items require action by the committee and pending information about 2017 funding

**Adjournment**

There being no further business, Chair Rainey called for a motion to adjourn. Ald. Braithwaite moved adjournment, J. Sanke seconded the motion and it was approved unanimously. The meeting was adjourned at 7:58 pm.

Respectfully submitted,

Sarah K. Flax  
Housing and Grants Administrator

**NEIGHBORHOOD WATCH**  
**Block P.A.R.T.Y.**

Friday, March 10, 2017

To: The City of Evanston Housing and Community Development Act Committee

From: The residents of the immediate area impacted by the recent "Affordable Housing" planned for 1305 Dempster St., powered in part by CDBG funding.

My name is Jared Davis, I live at 2303 Dempster St. (corner of Dempster & Pitner).

During last week's 2nd ward meeting, the City revealed its plans to construct a sixteen (16) unit, affordable housing complex at the (northeast) corner of Dempster and Pitner.

We applaud this project by the City and its very good intentions and we fully support and will contribute to the City and its efforts to become that social change leader in our state and our country!

However, we do not fully support the decision the City has made to pursue this particular project in our neighborhood.

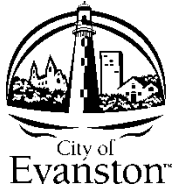
Some of the obvious reasons we oppose this project;

- The overall growing residential congestion of our block and streets.
- Dempster St. being a major truck and tourist (mainly NU) way-finding route, in and out of the city, adds to the residential traffic congestion and the pollution (air pollution / noise pollution) that our block is already burdened with.
- The West End Industrial district (rightfully so) has its "gateway" at the doors to our block.
- The already overcrowded or at capacity on-street parking problems on our block.
- The existing need for better traffic control at the adjacent, accident prone intersections, (Dempster / Pitner & Dempster / Hartrey by the car wash).
- This project will certainly bring more vehicular and foot traffic to a dense & dangerous area where even some of our own aldermen have experienced the 1st hand dangers of the sometimes blind intersection.
- Sixteen more **families**, not just residents, worth of garbage and recycling added to our block with still only one day of trash and recycling pick up.
- traffic congestion from our high school, two elementary schools and 1 middle school.
- two major employers (Districts 65 & 202).
- a major health center.
- ...just to name a few issues this project faces and presents to our block.

We kindly ask that you consider a different location for this seemingly admirable venture.

Best Regards,

Jared Davis  
2303 Dempster St.  
847-814-8512  
[contact.jared.davis@gmail.com](mailto:contact.jared.davis@gmail.com)



# Memorandum

**To:** Chair and Members of the Housing & Community Development Act Committee

**From:** Johanna Leonard, Community Development Director  
 Sarah Flax, Housing & Grants Administrator  
 Nora Holden-Corbett, Grants & Compliance Specialist  
 Jessica Wingader, Grants & Compliance Specialist

**Subject:** 2017 Entitlement Grant Funding from U.S. Department of Housing and Urban Development

**Date:** June 22, 2017

Recommended Action:

Staff recommends increasing CDBG Administration to 20% of the actual grant amount, and increasing allocations for Graffiti Removal, Summer Youth Employment, Certificate of Rehab, and Housing Rehabilitation Administration.

Funding Source:

2017 City of Evanston Entitlement Grants				2017 change from 2016	
Grant	2016	2017 Estimate	2017 Actual	Dollars	Percent
CDBG	\$ 1,603,225	\$ 1,500,000	\$ 1,622,067	\$ 18,842	1.18%
HOME	\$ 276,362	\$ 250,000	\$ 281,174	\$ 4,812	1.17%
ESG	\$ 144,459	\$ 145,000	\$ 144,334	\$ (359)	-0.09%

Livability Benefit:

- Built Environment: Support housing affordability
- Built Environment: Provide compact and complete streets and neighborhoods
- Economy & Jobs: Expand job opportunities
- Equity & Empowerment: Support quality human services programs

Summary:

The U.S. Department of Housing & Urban Development released the 2017 Federal grant allocations for Entitlement Grantees on June 14, 2017. The City of Evanston will



receive \$1,622,067 for the Community Development Block Grant Program (CDBG), \$281,174 for the HOME Investment Partnerships Program (HOME), and \$144,334 for the Emergency Solutions Grant Program (ESG). The City's CDBG allocation is 1% more than its grant amount for 2016, and over \$100,000 more than the estimate used for 2017 allocations for specific activities.

The Housing & Community Development Act Committee must now decide how to allocate the additional CDBG funds. The attached spreadsheet increases CDBG Administration to 20% of the actual grant, as allowed by HUD (\$324,413) and rounds remaining activities up to an even amount.

With the increased funding allowed for Public Services, staff recommends increasing allocations for Graffiti Removal, Summer Youth Employment, and Certificate of Rehab. These three activities received among the lowest percentages of their requests in the September allocations. Increasing CDBG for these activities brings them in line with 2016 funding and reduces expenses to the General Fund.

Staff recommends allocating the remaining dollars to Housing Rehabilitation Administration. Both the rehab loans and program administration are funded by the CDBG Revolving Loan Fund and entitlement dollars allocated annually. No General Fund revenues are budgeted for this program. Housing Rehab Administration was funded significantly below its 2017 request because of the expectation of receiving substantial additional revolving loan fund payments later that year. However, much of the revolving loan payoffs received in 2016 have already been committed to rehabilitation projects in 2017; approximately \$74,000 remains uncommitted. Increasing CDBG entitlement for CDBG Rehab Administration brings its allocation to 72% of the request and preserves Revolving Loan funds for projects.

These proposed changes will not trigger a substantial amendment to the draft 2017 Action Plan, which the Committee approved at its meeting in November 2016. Following the Committee's allocation of the additional funds, the draft Action Plan will be updated and submitted to City Council on July 10, 2017 for approval. The plan will be submitted to HUD for approval by July 12, 2017. HUD has 45 days to review and approve before grant agreements are executed and funds are released.

Attachments:

2017 CDBG Allocation Spreadsheet

## City of Evanston - Staff Recommended 2017 CDBG Allocations

		2017 Request	Committee Recommendation		Actual Grant Amount	
<b>Total Applications</b>		\$ 2,723,348	\$ 1,618,750		\$ 1,879,574	
<b>Total Estimated Funds Available</b>		\$ 1,618,750	\$ 1,618,750		\$ 1,879,574	
<b>Estimated To Be Cut:</b>		\$ 1,104,598	\$ (0)		\$ (0)	
Program/Project Name	2016 Allocation	2017 Request	Committee Recommendation	% of Request	Committee Recommendation	% of Request
<b>Administration -- 20% Cap</b>						
City/CDBG Administration & Planning	\$ 320,645	\$ 300,000	\$ 300,000	100%	\$ 324,413	100%
<b>Administration Subtotal</b>	<b>\$ 320,645</b>	<b>\$ 300,000</b>	<b>\$ 300,000</b>	<b>100%</b>	<b>\$ 324,413</b>	<b>100%</b>
<b>Spending cap (20% of entitlement)</b>		<b>\$ 300,000</b>	<b>\$ 300,000</b>		<b>\$ 324,413</b>	
<b>Amount over (under) cap</b>		<b>\$ -</b>	<b>\$ -</b>		<b>\$ (0)</b>	
<b>Public Services -- 15% Cap</b>						
Family Focus/The Future Focus-Youth Program	\$ 20,000	\$ 20,000	\$ 15,000	75%	\$ 15,000	75%
Open Studio Project/Art and Action	\$ 5,000	\$ 5,000	\$ 3,928	79%	\$ 4,000	80%
Youth Job Center/Youth Employment Programs	\$ 31,817	\$ 50,000	\$ 21,797	44%	\$ 21,800	44%
Housing Options for the Mentally Ill-WORK	\$ 17,500	\$ 25,000	\$ 15,286	61%	\$ 15,300	61%
LAF/Evanston Legal Services	\$ 7,250	\$ 10,000	\$ 6,964	70%	\$ 7,000	70%
Moran Center/Legal & Social Services	\$ 25,000	\$ 30,000	\$ 21,785	73%	\$ 21,800	73%
North Shore Senior Center/Grandparents Raising	\$ 13,000	\$ 15,000	\$ 10,500	70%	\$ 10,500	70%
Meals At Home/Home-Delivered Meals	\$ 15,000	\$ 19,000	\$ 14,643	77%	\$ 14,700	77%
Interfaith Action/Emergency Overnight Shelter Expansion	\$ 10,000	\$ 20,000	\$ 12,429	62%	\$ 12,500	63%
YWCA Evanston-NS/Domestic Violence Services	\$ 31,817	\$ 35,000	\$ 24,701	71%	\$ 24,800	71%
Connections for the Homeless/Supportive Housing	N/A	\$ 45,000	\$ 15,071	33%	\$ 15,100	34%
Children's Home & Aid/Rice Center Services	N/A	\$ 30,000	\$ 6,929	23%	\$ 7,000	23%
Open Communities/Home Sharing	N/A	\$ 12,000	\$ 7,429	62%	\$ 7,500	63%
Evanston Scholars/College Readiness	N/A	\$ 10,000	\$ 5,179	52%	\$ 5,200	52%
City/Target Area Graffiti Removal	\$ 41,900	\$ 45,000	\$ 20,357	45%	\$ 41,921	93%
City/Summer Youth Employment Program	\$ 22,000	\$ 52,000	\$ 16,714	32%	\$ 22,000	42%
City/Certificate of Rehab & Record Sealing	\$ 30,000	\$ 60,000	\$ 18,285	30%	\$ 30,000	50%
<b>Public Services Subtotal</b>		<b>\$ 483,000</b>	<b>\$ 236,997</b>	<b>49%</b>	<b>\$ 276,121</b>	<b>57%</b>
<b>Spending cap (15% of entitlement +RL+PI)</b>		<b>\$ 236,997</b>	<b>\$ 236,997</b>		<b>\$ 276,121</b>	
<b>Amount over (under) cap</b>		<b>\$ 246,003</b>	<b>\$ (0)</b>		<b>\$ 0</b>	
<b>Housing</b>						
City/Housing Rehab Administration	\$ 185,000	\$ 200,000	\$ 85,000	43%	\$ 143,499	72%
Housing Rehab Loan Repayments	\$ 180,861	\$ 57,937	\$ 57,937	100%	\$ 174,666	100%
<b>Housing Rehabilitation Subtotal</b>		<b>\$ 257,937</b>	<b>\$ 142,937</b>	<b>55%</b>	<b>\$ 318,165</b>	<b>123%</b>
<b>Code Enforcement</b>						
City/CDBG Target Area Code Enforcement	\$ 325,000	\$ 350,000	\$ 300,000	86%	\$ 300,000	86%
<b>Code Enforcement Subtotal</b>		<b>\$ 350,000</b>	<b>\$ 300,000</b>	<b>86%</b>	<b>\$ 300,000</b>	<b>86%</b>
<b>Public Facilities &amp; Improvements</b>						
Children's Home & Aid/Security Improvements	N/A	\$ 77,310	\$ 59,243	77%	\$ 59,250	77%
Infant Welfare Society/Baby Toddler Nursery	N/A	\$ 80,000	\$ 75,242	94%	\$ 75,250	94%
Reba Early Learning Center/Building & Grounds	N/A	\$ 58,000	\$ 56,243	97%	\$ 56,250	97%
Ridgeville Park District/Brummel Park Play Circuit	N/A	\$ 79,000	\$ 76,242	97%	\$ 76,250	97%
CJE/Awning Replacement	\$ 4,000	\$ 1,255	\$ -	0%	\$ -	0%
YOU/Parking Lot Renovation	\$ 64,443	\$ 75,000	\$ -	0%	\$ -	0%
City/Alley Paving Project	\$ 168,436	\$ 450,000	\$ 150,000	33%	\$ 150,000	33%
City/Street Resurfacing Project	\$ 211,479	\$ 500,000	\$ 210,000	42%	\$ 210,000	42%
<b>Public Facilities Subtotal</b>		<b>\$ 1,320,565</b>	<b>\$ 626,970</b>	<b>47%</b>	<b>\$ 627,000</b>	<b>47%</b>
<b>Economic Development</b>						
Economic Development Loan Repayments	\$ 14,492	\$ 11,846	\$ 11,846	100%	\$ 33,875	100%
<b>Economic Development Subtotal</b>		<b>\$ 11,846</b>	<b>\$ 11,846</b>	<b>100%</b>	<b>\$ 33,875</b>	<b>100%</b>
<b>Totals</b>		<b>\$ 2,723,348</b>	<b>\$ 1,618,750</b>		<b>\$ 1,879,574</b>	
<b>Total Estimated Funds Available</b>		<b>\$ 1,618,750</b>	<b>\$ 1,618,750</b>		<b>\$ 1,879,574</b>	
<b>Estimated To Be Cut:</b>		<b>\$ 1,104,598</b>	<b>\$ (0)</b>		<b>\$ (0)</b>	

### Estimated Funds Available:

	Est 9/23/16	Actual 6/14/17
2017 CDBG Grant (estimated 6.5% under 2016 grant of \$1,603,225)	\$ 1,500,000	\$ 1,622,067
2016 Revolving Loan repayments	\$ 69,783	\$ 208,541
2016 Program Income	\$ 10,197	\$ 10,197
Unspent Prior Years Funds for Reallocation	\$ 38,769	\$ 38,769
<b>Total Available Funds:</b>	<b>\$ 1,618,750</b>	<b>\$ 1,879,574</b>

**Chicago-Cook County Assessment of Fair Housing  
Scope  
February 9, 2017**

In the summer of 2015, the U.S. Department of Housing and Urban Development (HUD) published a new rule on affirmatively furthering fair housing. The new rule requires entitlements and public housing authorities (PHAs) to produce an Assessment of Fair Housing (AFH). Cook County includes 21 different entitlements and housing authorities that will need to produce an AFH.

HUD encourages local entities to collaborate on regional AFH. Collaboration offers numerous potential benefits. Entitlements and PHAs can more efficiently and effectively meet federal fair housing requirements, often at a cost-savings to previous fair housing analyses. An AFH for all of Cook County allows participants to utilize the ongoing work of high-capacity civic organizations to define and assess equity related topics at a regional scale. This scope outlines the partners, roles, process, geography, and timeframe for the development of an AFH for all of Cook County.

**Timeframe**

Under the rule, the participants must choose one lead entity for the submission of the plan. That lead entity must be an entitlement or PHA. The due date for all participants will be that of the lead entity. The due date for the county-wide AFH does not change the due dates for consolidated plans or PHA five year plans. So as to minimize the impact on local consolidated five year planning timelines, this project is anticipated to last 21 months, from July 2017 to April 2019.

**Partners and roles**

- *Lead entity-* All entitlements and PHAs participating in this AFH must designate, through an IGA, a jurisdiction to serve as the lead entity. Beyond setting the due date for the AFH, the lead entity must also oversee the submission (including in the HUD designated system) of the AFH on behalf of all participants along with addressing follow-up inquiries about the effort. \_\_\_\_\_ will serve as the lead entity for this project.
  
- *Entitlements-* Both municipal and county entitlements are partners in this project. Such participation may take many forms depending on interest and capacity. Staff members and elected officials will spend time participating in meetings, reviewing deliverables, and conducting local outreach. Moreover, entitlements will be expected to provide funding to support the project. The collaborative nature of this project is expected to reduce the cost of compliance for most entities. The following entitlements are voluntarily participating in this project:  
  
\_\_\_\_\_.
  
- *PHAs-* Under the rule, a PHA must also produce an AFH. Much like with entitlements, this scope envisions that PHA staff and officials will to participate in meetings, review

deliverables, and conduct local outreach. PHAs will be expected to provide funding to support completion of the project. This is a new cost for PHAs, as they have not conducted such fair housing planning in the past. The following PHAs are voluntarily participating in this project: \_\_\_\_\_.

- *Chicago Metropolitan Agency for Planning*- CMAP is the official regional planning organization for the northeastern Illinois counties of Cook, DuPage, Kane, Kendall, Lake, McHenry, and Will. CMAP developed and now guides implementation of the GO TO 2040 comprehensive regional plan, and also developed the region's Fair Housing and Equity Assessment (FHEA) as part of a Sustainable Communities Regional Planning grant. CMAP will provide of technical assistance to develop the AFH and oversee the participation of other civic organizations. .
- *Civic organizations*- The following civic organizations will assist entitlements and PHAs with the development of an AFH: Chicago Area Fair Housing Alliance and the Metropolitan Planning Council (MPC). These groups will provide specialized assistance on key topic areas ranging from fair housing complaints and compliance to development of new metrics and national best practices around equity issues.

### **Project Team**

The day-to-day operation and oversight of the project will be managed by a project team composed of CMAP, participating civic organizations, one Cook County representative, one City of Chicago representative, one Chicago Housing Authority representative, one Housing Authority of Cook County representative, one municipal PHA, and one municipal entitlement. The Project Team will meet regularly to discuss progress on the project, upcoming steps, and share completed work product between the parties.

### **Steering Committee**

To represent the considerations of the many parties involved in development of the AFH, a steering committee will provide feedback to the Project Team throughout the planning process. This broad group will consist of one representative from each participating entitlement or PHA. The steering committee will review all draft documents in advance of public release and/or legislative review/approval.

# Tasks

## 1. Pre-kickoff work

Before the project formally kicks off, several steps must be completed. These activities will occur prior to the “formal” project initiation in July 2017. These tasks include the following.

- The governing body of each participating entity will need to approve a resolution expressing support for the project and authorizing participation.
- All participants must sign an intergovernmental agreement (IGA) that explains expectations for the relationship between CMAP and the participants, project management, access to resources, contribution of local funding to support the project, etc. The IGA document will need to be signed before the project formally begins.
- CMAP will notify HUD via letter which parties are participating in the AFH and submit a copy of the IGA.

## 2. Outreach

Strong public outreach that goes beyond HUD statutory requirements will be a backbone of this project. To accomplish this, outreach will take place in three distinct parts.

- Initially public outreach will occur through large activities. CMAP will use the online survey site MetroQuest to develop an English and Spanish survey that can be used throughout the County to assess the fair housing issues that are of greatest concern. Concurrent with the MetroQuest site, CMAP will work with partners to facilitate seven workshops, three in the City and four in the County. Some entitlements and PHAs will want to ensure that a workshop is being held in their community. As such, CMAP will prepare “meeting in a box” materials that project partners can use to conduct additional workshops using the same materials and format. Work in this phase will include outreach trainings for entitlements, PHAs, and service organizations to ensure that each can serve as viable partners to ensure participation from a wide array of stakeholders.
- The second phase of outreach will primarily consist of topical focus groups throughout the City and County. At the conclusion of the initial round of outreach activities, the Project Team will review who participated in the various events. Those findings will help guide the focus groups for phase two, ensuring that all are given the opportunity to participate, including the following groups highlighted by HUD. The need for outreach in languages other than English and Spanish will be considered on a case-by-case basis.
  - State or local fair housing agencies and organizations
  - Tenant organizations
  - Community-based organizations that represent protected class populations
  - Faith-based organizations
  - Public and private agencies that provide social services
  - Philanthropic organizations
  - Resident Advisory boards for participating PHAs
  - States and local universities
  - Disability advocacy groups
  - Public, private, and non-profit housing providers
  - Realtors

- Property management companies
- Lenders
- Ex-offenders/criminal justice groups
- Continuum of Care
- Human Rights Commissions
- Private developers

As in phase one, CMAP will prepare “meeting in a box” materials that project partners can use to conduct focus groups using the same materials and format. Users of the “meeting in a box” materials will be responsible for timely reporting of meeting outcomes for integration into the larger effort.

- The final phase of public outreach would occur as the plan is finalized and approved. Seven open houses would be held, three in the City and four in the County, for parties to review and comment on the draft plan. All of these open houses would occur during a 30 day public comment period. After comments received during the open houses and the 30 day public comment period are integrated into the document, each entitlement and PHA would need to proceed with local approval, which would need to include a formal public hearing.

Beyond the specific outreach tasks identified above, CMAP and other civic partners on this project are always conducting outreach in the region for various projects and it is assumed that outreach from those activities would also be brought to bear on this project. In particular, CMAP is in the process of creating ON TO 2050, the region’s next comprehensive plan. Topics being researched as part of ON TO 2050 include housing choice, inclusive growth, resilience, and disinvested areas. Findings from ON TO 2050 will be utilized in AFH development.

CMAP will create and host a dedicated project webpage containing information on the planning process and key deliverables. Each PHA and entitlement will need to include a link from their own website to the CMAP project webpage. Materials posted on the webpage may include project announcements, upcoming meeting dates, meeting materials, draft documents for review, online surveys, etc. CMAP will be responsible for posting the material and keeping the page up-to-date.

All public outreach collected during the process will be summarized in an outreach document that will be an appendix to the plan. This will include a description of outreach activities; approach to reaching various populations, including underrepresented populations; a list of people/organizations who participated during the planning process; a summary of the feedback received throughout the process; and a log of all comments received during the open houses and public comment period, including a summary of any comments, views, and recommendations not accepted by the program participant and the reasons for non-acceptance.

### **3. Existing conditions analysis**

An important interim product is the “existing conditions report.” This document will discuss the existing conditions of fair housing, including patterns of integration and segregation; racially or ethnically concentrated areas of poverty; disparities in access to transit, jobs, and economic opportunity; and disproportionate housing needs.

Collaborating program participants are accountable for their individual analysis along with that of a joint regional analysis. Participating in a county-wide AFH does not relieve each collaborating program participant of its obligation to analyze and address local and regional fair housing issues and contributing factors that affect fair housing choice.

Given this, the existing conditions report will include one regional analysis of fair housing conditions in the region and local assessments for individual participants. See the [Kansas City Metropolitan Area AFH](#) as a potential model. The analysis will include the following:

- A demographic summary that includes an analysis on patterns of segregation and integration locally and regionally and factors that that significantly impact segregation/integration.
- Identification of Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), disparities in access to opportunity, and disproportionate housing needs, and factors that significantly impact the presence of these issues.
- An analysis of publicly supported housing in terms of location, demographics, occupancy, and access to opportunity, along with the identification of factors that significantly impact the existing conditions.
- An analysis of the presence, location, and access to opportunity of persons with disability, along with the identification of factors that significantly impact the existing conditions.
- An assessment of the current fair housing ecosystem, including the capacity of individual jurisdictions to conduct fair housing outreach or enforcement, whether themselves or through a local partner, along with the identification of factors that significantly impact the existing conditions.

Local data will be used to supplement HUD provided data. The Lead Entity will be responsible for helping CMAP and other consultants access the HUD provided data. Supplemental data will be identified in many ways, including through Task 2. The Project Team also anticipates using data developed in ongoing planning activities to inform the existing conditions analysis, including ON TO 2050, MPC’s Cost of Segregation project, and the FHEA.

### **4. Plan development**

#### *Task 4a: Key recommendations memo*

Before the plan is drafted, the Project Team will prepare a memo describing the key recommendations that are expected to be contained in the plan. The memo will include both fair housing goals and priorities applicable to all participants and local fair housing goals and priorities applicable to each individual participant. The purpose of the memo is to provide each



participant with a summary of key recommendations before much time is spent writing them in detail; if there are significant problems with any elements of the report, they should surface at this point. Individual memos will be prepared for each participant. At least one Steering Committee meeting is envisioned to discuss the county-wide recommendations. Each participant will be responsible for determining the preferred local process to vet the memo.

*Task 4b: Draft plan*

The findings from community outreach and the existing conditions report along with the recommendations memos will be synthesized into a draft AFH. The AFH must be submitted via the online HUD assessment tool. CMAP and the Lead Entity will work closely with the rest of the Project Team create a draft AFH that follows the proscribed HUD framework. The Steering Committee will be responsible for reviewing and providing feedback on the drafts of the AFH during this phase of the project.

*Task 4c: Graphic Design*

To supplement the official HUD version of the plan that will be submitted online, CMAP will take contents of the draft plan to create one easy-to-read and graphically rich summary. The graphic document will cover public involvement, key findings, and local and county-wide recommendations.

## **5. Plan approval**

*Task 5a: Open houses and comment period*

As noted under Task 2, the Project Team will hold seven open houses, three in the City and four in the County, for parties to review and comment on the draft plan. All of these open houses would occur during a 30 day public comment period. The Project Team will finalize the plan after the close of the comment period.

*Task 5b: Public hearings*

Public hearings will be held on the finalized plan as needed in each entitlement and PHA. Each PHA and entitlement is responsible for all noticing related to the public hearing. The Project Team will provide support as necessary.

*Task 5c: Approval*

Each participating PHA and entitlement will formally approve the AFH. Each PHA and entitlement is responsible for all noticing related to the approval meeting. The Project Team will provide support as necessary.

*Task 5d: HUD submission and approval*

After the plan has been approved by all parties, the AFH must be submitted to HUD. The Lead Entity will be responsible for submission to HUD, including the uploading of all materials in the HUD submission system.



HUD will either approve the AFH or provide a response letter noting required changes within 60 days of submission. HUD may accept a regional AFH for some participants, but not accept the regional AFH for others. The Project Team will work with any participants for whom the regional AFH was not accepted by HUD to address any changes and resubmit within the designated response period.

### Geographies anticipated to participate

Entitlements	PHAs
City of Chicago	CHA
Cook County	Cicero HA
Arlington Heights	Housing Authority of Cook County
Berwyn	Maywood HA
Chicago Heights	Oak Park HA
Cicero	Park Forest HA
Des Plaines	
Hoffman Estates	
Mount Prospect	
Oak Lawn	
Oak Park	
Palatine	
Schaumburg	
Evanston	
Skokie	

### **Assessment of Fair Housing Timeline**

Category	Q4 2016	Q1 2017	Q2 2017	Q3 2017	Q4 2017	Q1 2018	Q2 2018	Q3 2018	Q4 2018	Q1 2019
Pre-kickoff work										
Outreach										
Existing conditions analysis										
Plan development										
Plan adoption										



# Chicago Metropolitan Agency for Planning

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\_\_\_\_\_, 2017

Bryan Greene, Acting Assistant Secretary for Fair Housing  
U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street, SW  
Washington, DC 20410

Dear Acting Assistant Secretary Greene,

This letter is notice to you that we the undersigned HUD entitlement jurisdictions and public housing authorities in the Chicago-Naperville-Elgin core based statically area intend to collaborate on a regional Assessment of Fair Housing (AFH). All of the participating entitlements and public housing authorities are located within the operating boundaries of the Chicago Metropolitan Agency for Planning, the regional planning agency for northeastern Illinois. The boundaries of the Chicago Metropolitan Agency for Planning will function as the regional geography area of assessment for the AFH.

We are currently developing a more formal agreement to this effect among our jurisdictions and agencies, as called for in 24 CFR § 5.156(a)(3), and we will forward it to you when it is complete, as stipulated in § 5.156(a)(4). This agreement will specify \_\_\_\_\_ as our lead entity to oversee the submission of the AFH on behalf of all collaborating program participants. § 5.156(b)(1) states that "to the extent practicable all collaborating program participants must be on the same program year and fiscal year before submission of a joint AFH." The current four large entitlements and PHAs participating in this regional AFH each have different program years and consolidated planning or five year planning timeframes. Moreover, we anticipate adding more PHAs and entitlements to this regional effort in the coming months and those entities too would have different program years and consolidated planning or five year planning timeframes. Therefore, it is not practicable to attempt to achieve aligned program and fiscal year coordination while also pursuing an ambitious regional AFH.

Because \_\_\_\_\_'s next consolidated plan cycle will be \_\_\_\_\_, 2020 – \_\_\_\_\_, 2025, our joint AFH will be due to HUD on \_\_\_\_\_, 2019. This Regional AFH will serve as the AFH for all of our agencies, including (*space for inclusion about note for any PHAs with dates due before this time and how they will continue to address fair housing issues*).

In the time before our regional AFH is due in 2019, we hope to work with you and your staff to determine if the new final assessment tool is sufficient for a regional AFH with so many participants or if there are needed adjustments to make it more functional. HUD's responses to comments on the draft tool indicate that this type of dialogue and adjustment could be possible over the course of developing a regional AFH. Please let us know how we can pursue this kind of dialogue with key HUD staff in the coming months.

Finally, due to the uncertainty at this time both around both the future of AFH ~~regulations and the funds that some participants would use to support their~~ participation, the undersigned entitlement jurisdictions and public housing authorities reserve the right to choose at a later date to withdraw from this planned regional AFH in accordance with § 5.156(c).

Please contact our Jonathan Burch at the Chicago Metropolitan Agency for planning [jburch@cmap.illinois.gov](mailto:jburch@cmap.illinois.gov) with any follow-up questions or comments.

We look forward to working with you, and we will be in touch shortly with our formal regional AFH agreement.

Sincerely,

(Signatories for Chicago, CHA, Cook County, and HACC to be included).