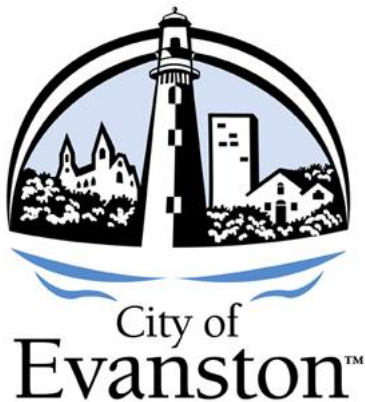


City of Evanston  
2020-2024  
Consolidated Plan  
and  
2020 Action Plan

Approved by City Council  
April 13, 2020



## Executive Summary

### ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The five-year Consolidated Plan is the City of Evanston's primary vehicle for identifying and prioritizing housing, community development and economic needs and strategies to guide the use of its entitlement funding from the U.S. Department of Housing and Urban Development (HUD). The City receives Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) funds annually to address needs in our community. The statutory goals of the HUD Consolidated Plan are to provide decent housing and a suitable living environment, and expand economic opportunities, principally for low- and moderate-income persons. The Consolidated Plan is submitted to HUD for approval following its development according to the regulations in 24 CFR Part 91, which includes consultation with community stakeholders and input from the public.

The City of Evanston is committed to a diverse and inclusive community that engages and encourages residents and institutions to work together to make Evanston the most livable city for all its residents. To this end, the City will continue to pursue strategies to address housing, economic, and social service needs of low- and moderate-income residents, the homeless and special needs populations. Neighborhood revitalization in areas which lag behind the rest of the community is also a priority. Evanston has established numerous tools and partnerships to address the continued effects of rising housing costs and stagnant wages that continue to stifle progress, particularly for low- and moderate income residents in our city.

Evanston's 2020-2024 Consolidated Plan was prepared using actual funding for 2020 and estimated funding for 2021-2024. The City has based its anticipated grant amounts on actual funding levels in the last five years. In addition, the plan uses the new low/moderate income area data recently released by HUD, which is based on American Community Survey data from 2011-2017. These data show significant change to the areas with a high percentage of low- and moderate-income residents and to the part of the City that can be qualified as a Neighborhood Revitalization Strategy Area to focus resources and efforts and bridge the widening gap between struggling neighborhoods and our community as a whole. While the City believes that the strategies employed in the last five years have had a positive effect on these two areas, the dramatic changes seen in the data for some areas is not supported by direct observation of neighborhood conditions. A new Neighborhood Revitalization Strategy Area, comprising portions of the 5th and 2nd ward, is being evaluated based on the new low/mod area data, which follows the boundaries of Evanston's redlined neighborhoods, and in conjunction with the development

of the City's Reparations Plan. In addition, the City may propose using surveys to qualify areas with primarily low and moderate income residents that are not identifiable using ACS data.

The 2020-2024 Consolidated Plan employed an expanded citizen outreach and participation process using an online questionnaire in addition to a paper form that was promoted via email, social media, and through community partnerships. This resulted in a significant increase in the number of people providing input on the priority needs of Evanston's low and moderate income residents. Details can be found in PR-15: Citizen Participation.

## **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment**

### **Overview**

The objectives remain similar to those identified in the prior assessment; affordable housing remains a predominant need and continues to be the City's highest priority.

**Affordable housing:** Housing activities will focus on rental, to maintain and increase the supply of affordable units. Other activities will focus on the rehab of owner-occupied low income residents' homes to address code and life safety issues and prevent displacement. Code enforcement is an important tool to maintain decent safe housing and address blight from vacant and poorly maintained properties.

**Homelessness:** HOME funding will be used to continue the Tenant-Based Rental Assistance program for families with children in Evanston schools. In combination with education, job training and other supports, TBRA will provide stability for parents to raise their children and lift two generations out of poverty. ESG will continue to address the needs of the most vulnerable, individuals who are homeless or at high risk of homelessness, including victims of domestic violence.

**Creating livable communities:** The City will continue to use CDBG funding to make improvements to public facilities and infrastructure, including alley and street paving, street lighting, sidewalks, and parks and other public facilities to revitalize challenged neighborhoods and strengthen community.

**Economic development:** Economic development is a lower priority of this plan in terms of funding levels because the City uses local resources, including Tax Increment Financing, for economic development.

**Public Services:** Expanding the availability of and increasing access to needed services, particularly for historically underserved people including people of color, is a key goal of the City. Services include, but are not limited to, job training and youth programs. As required, the Needs Assessment did poll residents about broadband access. Evanston Public Library cardholders age 16 or older can participate in the Wi-Fi Hotspot lending program. This program provides free internet service for up to 4 weeks at a time. Wi-Fi hotspots were circulated over 1,000 times in 2018 to over 400 residents. The library started the program with 15 hotspots available and has expanded to 50 hotspots available to residents. Access to broadband was identified as a need by 26.6% of people who responded to the Community Needs

Assessment Survey. The City will continue to work in partnership with the library to monitor and expand the program.

### **3. Evaluation of past performance**

The City continued to fund Connections for the Homeless and the YWCA with ESG to address the needs of individuals and families who are homeless or at high risk of homelessness. Beginning in 2019, both subrecipients follow Progressive Engagement strategies for Rapid Re-Housing and Prevention clients. Funding is prioritized for rapid re-housing, following the housing first strategy of the HEARTH Act, while maintaining needed prevention funding, street outreach services and emergency shelter, particularly for domestic violence victims.

### **4. Summary of citizen participation process and consultation process**

The City of Evanston invites public participation at all stages of the Consolidated Planning process. The City is committed to making reasonable and timely access to the needs assessment, strategy development and budget recommendation process for all members of the community, particularly low- and moderate-income persons. Direct public input was solicited through an online community priority needs survey which was available in paper form, online and via 311 from July 15, 2019 to August 30, 2019. The survey provided a forum for Evanston residents to provide input and any comments they wished to make in regards to community priority needs for 2020 -2024. Community Development staff enlisted the assistance of Advocates for Action, a volunteer group of Evanston residents dedicated to building stronger communities by taking action on issues that impact the community. Specifically, this group collected over 200 paper and electronic surveys at community events and informal social gatherings.

The City's Community Development Department solicited input on needs through email invitations, neighborhood meetings, postings to the City's website and social media accounts (Facebook and Twitter), and targeted community outreach. Additionally, Community Development Department staff attended workshops at the low income senior housing complexes including Jacob Blake, Primm Tower, Perlman, and Walchirk to distribute paper copies and assist people in accessing the electronic version of the survey. Outreach to the Latinx community included forming unique partnerships with Evanston Township High School's Latino Liaison and Minority Languages Coordinator, St. Nicholas Church, which has a large Latinx congregation and Spanish language services, and working with Latino Resources, a non-profit organization dedicated to increasing active civic engagement within the Latinx community. Finally, the survey was distributed to nonprofit agencies that provide a broad range of social services to hear about barriers agencies face when serving clients and barriers clients face to receiving services. Staff also worked with Downtown Evanston and Evanston Business Districts to receive feedback from our business community.

## Demo

The public comment period for the City's draft 2020-2024 Consolidated Plan and draft 2020 Action Plan was from November 18 to December 17, 2019. The Consolidated Plan is available for viewing on the City's website and in print form at the Lorraine H. Morton Civic Center. The City of Evanston's Housing and Community Development Act Committee held a public meeting to hear comment on the draft 2020-2024 Consolidated Plan and 2020 Action Plan on Tuesday, December 17, 2019; this meeting marked the close of the public comment period. No public comment was received during the public comment period, including at the public meeting of the Housing & Community Development Act Committee on Tuesday, December 17, 2019.

### **5. Summary of public comments**

No public comment was received.

### **6. Summary of comments or views not accepted and the reasons for not accepting them**

Not applicable as no public comment was received.

### **7. Summary**

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

**1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	EVANSTON	Community Development
HOME Administrator	EVANSTON	Community Development
ESG Administrator	EVANSTON	Community Development

**Table 1 – Responsible Agencies**

### Narrative

The City of Evanston's Community Development Department is the administrator for the Community Development Block Grant, HOME, and Emergency Solutions Grant programs.

### Consolidated Plan Public Contact Information

Sarah Flax

Housing and Grants Manager

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847-448-8684

## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

In order to develop the Consolidated Plan, the City of Evanston's Community Development Department consulted with numerous City departments, Public Works, Health, Parks and Recreation, Utilities, Economic Development, and the Housing Authority of Cook County, Alliance to End Homelessness in Suburban Cook County Continuum of Care, local and regional nonprofit service providers, housing providers, and community residents. Data were retrieved from consulted organizations, the United States Census Bureau and HUD.

### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).**

The City of Evanston's Community Development Department regularly coordinates with public and assisted housing providers along with private and governmental health, mental health, and social services agencies. Notifications of recent updates and developments are sent to an interested parties email list, including nonprofit service providers, governmental agencies, community residents, and representatives from various City departments.

The Community Development Department regularly attends meetings and other events involving the community and various stakeholders. Staff is aware of any major occurrence that which would impact housing or health of vulnerable community residents. Engaging with nonprofit service providers on a regular basis will continue to foster an environment where the City works in tandem with the community towards better development. Continuing to work with local and regional stakeholders will only serve the best interests of the Evanston community.

The City of Evanston's Health Department hosts an annual Health Summit attended by community and government organizations. The purpose of the Evanston Health Summit is to assess existing community health priorities, determine which areas of need are most urgent, and identify how to mobilize community resources in order to improve these areas. Coordination established at the Evanston Health Summit between public and assisted housing providers and private and governmental health, mental health and service agencies will only help to better serve the Evanston Community.

The City combined the allocation processes for CDBG Public Services and the City's Mental Health Board funding. This will better allocate funds towards the highest priority needs of the community and ensure collaboration amongst community partners.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness**

The City of Evanston continuously works with the Alliance to End Homelessness in Suburban Cook County Continuum of Care (CoC) to address the needs of homeless persons and persons at risk of homelessness. The increased coordination and collaboration with the CoC has allowed the City to better integrate programs and services with Coordinated Entry. Coordinated Entry is a CoC-wide system that standardizes and expedites the process by which people experiencing homelessness or who are at imminent risk of homelessness access shelter, housing, and homeless resources. Coordinated Entry helps Evanston and the greater Suburban Cook County area prioritize assistance based on vulnerability and severity of services needed.

The City of Evanston's strategy for developing a system to address homelessness and the priority needs of homeless persons and their families, including homeless subpopulations, is in alignment with that of the Alliance to End Homelessness in Suburban Cook County. Evanston closely works with the nonprofit service providers including the YWCA Evanston -North Shore, Interfaith Action, McGaw YMCA, Family Promise North Shore, and Connections for the Homeless in addressing the needs of chronically homeless individuals and families, families with children, veterans, and unaccompanied youth. These organizations work with the City and the CoC to ensure that the needs at each stage of homelessness are addressed, gaps in facilities in terms of bed capacities and services are filled, and programs addressing housing and supportive needs appropriately serve Evanston's homeless persons and their families.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS**

The City of Evanston continues to work with the Alliance to End Homelessness in Suburban Cook County Continuum of Care, local agencies that serve the homeless and people at risk of homelessness and other advocacy organizations to develop and maintain policies and procedures to coordinate provision of emergency shelter, street outreach, homeless prevention and rapid re-housing assistance, mainstream and other services and housing providers. Connections for the Homeless, the primary recipient of City of Evanston ESG funds participates very closely with the Alliance on many levels. The City's Housing and Grants Manager is currently on the Finance Committee and the Grants and Compliance Specialist is a member of the Coordinated Entry Committee. Participation in the Alliance governance structure helps to ensure clear communication of goals and priorities and decrease redundancies as they relate to ESG funding.



## Demo

Coordination among ESG recipients is facilitated through participation in the Coordinated Entry process known as Entry Point which was developed by the Alliance; Entry Point policies and procedures were finalized in February 2019.

The City of Evanston recognizes that the demand is greater than available resources to provide essential services, emergency shelter, prevention and re-housing that meet all needs. The City and Alliance also recognize that individuals and households must be prioritized to ensure that these limited resources available are allocated in the most efficient and appropriate manner. Connections for the Homeless utilizes progressive engagement; by providing small amounts of assistance to clients on an “as needed” basis, case managers work to connect more people to housing.

The City of Evanston continues to work closely with the Health Department which is responsible for administering General Assistance and Emergency Assistance funds. There is a large overlap of populations served by both General Assistance and ESG, and staff continues to collaborate with partners to ensure funds are spent in the most efficient manner.

## **2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Housing Authority of Cook County (HACC)
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and provided data for relevant Consolidated Plan sections.
2	<b>Agency/Group/Organization</b>	MCGAW YMCA
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.
3	<b>Agency/Group/Organization</b>	YWCA Evanston/North Shore
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.
4	<b>Agency/Group/Organization</b>	Youth & Opportunity United
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education

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	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.
5	<b>Agency/Group/Organization</b>	MEALS ON WHEELS
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.
6	<b>Agency/Group/Organization</b>	James B. Moran Center for Youth Advocacy
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.
7	<b>Agency/Group/Organization</b>	METROPOLITAN TENANTS ORGANIZATION
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.
8	<b>Agency/Group/Organization</b>	FAMILY FOCUS
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education

Demo

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.
9	<b>Agency/Group/Organization</b>	Infant Welfare Society of Evanston
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Health Child Welfare Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.
10	<b>Agency/Group/Organization</b>	CONNECTIONS FOR THE HOMELESS
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.

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11	<b>Agency/Group/Organization</b>	COMMUNITY PARTNERS FOR AFFORDABLE HOUSING
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.
12	<b>Agency/Group/Organization</b>	ALLIANCE TO END HOMELESSNESS IN SUBURBANK COOK COUNTY
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.
13	<b>Agency/Group/Organization</b>	SHORE COMMUNITY SERVICES, INC..
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.

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14	<b>Agency/Group/Organization</b>	Evanston Community Foundation
	<b>Agency/Group/Organization Type</b>	Services - Housing Business and Civic Leaders Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and other related Consolidated Plan sections.
15	<b>Agency/Group/Organization</b>	EVANSTON
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Various city departments attended planning meetings to develop needs assessment and provided data for relevant Consolidated Plan sections. Departments included Community Development, Public Works, Parks, Utilities, Health, and Economic Development.
16	<b>Agency/Group/Organization</b>	Evanston Township Highschool
	<b>Agency/Group/Organization Type</b>	Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted with to provide data/input for relevant Consolidated Plan sections.
17	<b>Agency/Group/Organization</b>	Chicago Metropolitan Agency for Planning (CMAP)
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted with to provide data/input for relevant Consolidated Plan sections.
18	<b>Agency/Group/Organization</b>	Evanston/Skokie School District 65
	<b>Agency/Group/Organization Type</b>	Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted with to provide data/input for relevant Consolidated Plan sections.

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19	<b>Agency/Group/Organization</b>	Evanston Chamber of Commerce
	<b>Agency/Group/Organization Type</b>	Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Attended planning meetings to develop needs assessment and invited to provide input for relevant Consolidated Plan sections.
20	<b>Agency/Group/Organization</b>	ILLINOIS HOUSING DEVELOPMENT AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted with to provide data/input for relevant Consolidated Plan sections.
21	<b>Agency/Group/Organization</b>	Evanston Cradle to Career
	<b>Agency/Group/Organization Type</b>	Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Network of 40+ agencies using collective impact model to achieve equitable educational outcomes
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted with to provide data/input for relevant Consolidated Plan sections.

**Identify any Agency Types not consulted and provide rationale for not consulting**

All major agencies providing a full range of services in and around the City of Evanston were consulted or contacted to request comments/input.



**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Alliance to End Homelessness in Suburban Cook County	The Continuum of Care provides the framework and services for many of the activities provided locally to bring assistance and housing to homeless individuals and families.
Illinois' 2019 Annual Comprehensive Housing Plan	Illinois Housing Development Authority	The City of Evanston works with IHDA to ensure continued access to affordable housing for Evanston's low and moderate income residents. Working with IHDA furthers Evanston's low and moderate income housing goals.
Red and Purple Line Modernization	Chicago Transit Authority	Furthering access to employment opportunities is integral to community development and fostering greater economic growth. The modernization of the Red and Purple Line trains will serve to provide greater accessibility for those with disabilities and the elderly.
On To 2050	Chicago Metropolitan Agency For Planning	CMAP's On to 2050 Plan is a plan for regional growth in the Chicago area. Evanston is an important component of the Chicago metropolitan region and inclusive growth and development with the region will only improve the quality of life for Evanston's residents.
2000 Evanston Comprehensive General Plan	City of Evanston	The current Evanston Comprehensive General Plan was adopted in 2000. It establishes long range planning goals and objectives in functional areas of General Land Use, Public Facilities, Circulation, and Community Environment. An update to the plan is due shortly to address the changed economic landscape.
Evanston Climate Action Resiliency Plan	City of Evanston	The Evanston Climate Action Plan is organized into nine focus areas and outlines more than 200 strategies for reducing Evanston's greenhouse gas emissions. The nine focus areas are: Transportation & Land Use, Energy Efficiency & Buildings, Renewable Energy Resources, Waste Reduction & Recycling, Forestry, Prairie & Carbon Offsets, Food Production & Distribution, Policy & Research, Education & Engagement and Communications & Public Relations.
Plan For Affordable Housing	City of Evanston	Evanston's Plan for Affordable Housing looks at how to effectively and efficiently meet Evanston residents need for housing that is affordable. In addition the plan looks at the best ways to use federal and local funds to increase affordable housing opportunities in Evanston.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Cook County Consolidated Plan 2015-2019	Cook County	The City of Evanston is a jurisdiction within Cook County and is impacted by the goals and priorities put forth in the Consolidated Plan of Cook County. Public housing, homelessness, and affordable housing are some of the fields where Evanston and Cook County work in coordination to address.
HACC 5 Year PHA Plan and Annual Plan; 2014	Housing Authority of Cook County	The City of Evanston works with the Housing Authority of Cook County to ensure that their public housing goals are in coordination with those of Evanston in this Consolidated Plan. The HACC owns and operates public housing units in Evanston as well as the Housing Choice Voucher Program.

**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))**

The City of Evanston works cooperatively and in coordination with various public entities. The City cooperates and coordinates various aspects of the Consolidated Plan and shared regional interests with the neighboring local governments of Chicago, Wilmette, Skokie, and other North Shore communities. Evanston works with the Alliance to End Homelessness in Suburban Cook County, the municipality’s Continuum of Care, in implementing its homeless and near homeless programs and goals.

The City also actively engages with the Housing Authority of Cook County (HACC) which manages public housing within Evanston and surrounding Cook County. The Community Development Department is consciously aware of the quality and quantity of public housing within Evanston and cooperates with the HACC to implement any strategic goals put forth in the Consolidated Plan. In addition, attention is paid to Cook County’s Consolidated Plan in order to ensure an understanding of the focus areas and community development efforts of the entire County. Evanston coordinates with the Illinois Housing Development Authority to ensure their housing strategies and goals are reflected in the Consolidated Plan governing Evanston.

**Narrative (optional):**

The City of Evanston is served by the Evanston Health Department which was consulted throughout the Consolidated Planning process to provide the relevant data on the health needs of Evanston's population. This includes information on health services available within the community through partners or other organizations targeted to HIV/AIDS, youth, families, elderly, homeless, special needs, veterans, and all other populations.

## **PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The City of Evanston invites public participation at all stages of the Consolidated Planning process. The City is committed to making reasonable and timely access to the needs assessment, strategy development and budget recommendation process for all members of the community, particularly low- and moderate-income persons.

The City's Community Development Department solicits citizen participation through the use of email invitations, neighborhood meetings, postings to the City's website and social media accounts (Facebook and Twitter), newsletters and targeted community outreach. Direct public input was solicited through an online community priority needs assessment survey which was available in paper form, online and via 311 from July 15, 2019 to August 30, 2019. The survey provided a forum for Evanston residents to provide input and any comments they wished to make in regards to community priority needs for 2020 -2024.

Community Development staff enlisted the assistance of Advocates for Action, a volunteer group of Evanston residents dedicated to building stronger communities by taking action on issues that impact the community. This group collected over 200 paper and electronic surveys at community events and informal social gatherings.

Additionally, City staff attended workshops at the four low income senior housing complexes to distribute paper copies and assist people in accessing the electronic version of the survey. Outreach to the Latinx community included forming unique partnerships with Evanston Township High School, St. Nicholas Church in Evanston and working with Latino Resources, a non-profit organization dedicated to increasing active civic engagement in the Latinx community.

The public comment period for the City's 2020-2024 Consolidated Plan took place between November 18 and December 17, 2019. The Consolidated Plan is available for viewing on the City's website and in print at the Lorraine H. Morton Civic Center. The City of Evanston's Housing & Community Development Act Committee held a public meeting to hear comment on the draft 2020-2024 Consolidated Plan and 2020 Action Plan on Tuesday, December 17, 2019; this meeting marked the close of the public comment period. No public comment was received at the meeting or during the public comment period.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	Attendees present, but no public comment was made.	No comments were received.		<a href="https://www.cityofevanston.org/government/agendas-minutes/special-council-committees/housing-community-development-act-committee">https://www.cityofevanston.org/government/agendas-minutes/special-council-committees/housing-community-development-act-committee</a>

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Minorities  Non-targeted/broad community	Display ad in the October 14, 2019 issue of the Evanston RoundTable, a newspaper of general circulation, that the draft 2020-2024 ConPlan and draft 2020 Action Plan is available on the City's website and in printed format at the Civic Center beginning November 18, 2019, and that the public comment period will close on Tuesday, December 17, 2019, at the public meeting of the Housing & Community Development Act Committee.	No comments were received		<a href="https://www.cityofevanston.org/2020actionplan">https://www.cityofevanston.org/2020actionplan</a>
OMB Control No: 2506-0117 (exp. 06/30/2018)	Consolidated Plan			EVANSTON		20

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	Non-targeted/broad community	News item on the City's homepage and in an e-newsletter story that the draft 2020-2024 ConPlan and draft 2020 Action plan were available on the City website and also in printed format beginning November 18, 2019. No responses could be attributed specifically to the internet outreach.	No comments received.		<a href="http://www.cityofevanston.org/2020actionplan">http://www.cityofevanston.org/2020actionplan</a>

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Internet Outreach	Non-targeted/broad community  People who are active on social media	Mass email with information about the draft 2020-2024 Con Plan and draft 2020 Action Plan and public comment period sent to participants who signed up to receive email updates about CDBG, HOME, and ESG.	No comments were received.		<a href="http://www.cityofevanston.org/2020actionplan">http://www.cityofevanston.org/2020actionplan</a>

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Outreach through ward alderman at ward meetings and via email	Minorities 2nd, 5th, and 8th Ward residents	Information about the draft 2020-2024 Con Plan and draft 2020 Action Plan and public comment period provided in ward newsletters and at ward meetings when meetings were held. In the event ward meetings were cancelled, information was still sent in ward newsletters prior to and throughout the public comment period.	No comments were received.		<a href="http://www.cityofevanston.org/2020actionplan">http://www.cityofevanston.org/2020actionplan</a>



Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Internet Outreach	Non-targeted/broad community partners and people who work with target population receiving funds	Information about the draft 2020-2024 Con Plan and draft 2020 Action Plan and public comment period sent to community partners and past/current recipients of CDBG, HOME and ESG funding.	No comments were received.		<a href="http://www.cityofevanston.org/2020actionplan">http://www.cityofevanston.org/2020actionplan</a>

Table 4 – Citizen Participation Outreach

## **Needs Assessment**

### **NA-05 Overview**

#### **Needs Assessment Overview**

The Needs Assessment section of this Consolidated Plan highlights the challenges many low and moderate income Evanston residents face in finding safe, decent, and affordable housing. The housing cost burden experienced by low and moderate income residents has long been and will continue to be an issue confronted by the City of Evanston. The survey assessed broadband needs within the community and found that, of the sample that responded, the broadband needs were relatively low. HUD has provided the format and data for the tables found within the Needs Assessment. Most data are derived from the 2005-2009 and 2011-2015 American Community Survey from the United States Census Bureau.

## NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

The City of Evanston's total population was 75,605 in 2015 compared to 74,486 in 2009 and the total number of households was 29,265 in 2015 compared to 29,608 in 2009. The marginal increase in population and number of households highlights the stable nature of the population. According to 2011-2015 CHAS data, of the total households, 16,070 or 54.9%, are owner households and 13,195 or 45.1% are renter households. There has been a slight decrease in ownership and a slight increase to rental. Of note is the increase in median income over the same period. Median income in 2015 was \$70,041 compared to \$69,544 in 2009 (not adjusted for inflation), a 1% increase.

Of the total households, 11,380 or 38.9% are low/moderate income (0-80% HAMFI). Approximately 54.5% experience one of the four housing problems. Renters are more likely to experience one or more housing problems; 36.9% renters compared to 17.7% of owners.

**Housing Condition and Overcrowding:** Condition and quality of housing arrangements are not issues affecting a significant portion of the community. Among low and moderate income households, substandard housing, lacking complete plumbing or kitchen facilities, is experienced by 230 of renters and by 15 owners. Overcrowding is seen in 100 renter households and 75 owner households. The advanced age of Evanston's housing stock warrants the need for housing rehabilitation; local data suggest overcrowding is an issue among low/moderate income households as a result of doubling up or couch surfing.

**Cost Burden and Severe Cost Burden:** Small related households are defined as households with two to four related members. Large related households are those with five or more related members. Elderly are defined as a household whose head, spouse, or sole member is a person who is at least 62 years of age. Other is all other households. Approximately 40.1% of all households are cost burdened or severely cost burdened. Among renters, 51.5% are cost burdened compared to 30.7% of owners. Of the 7,925 low/moderate income renter households, 76% are cost burdened and 48.3% are severely cost burdened. Of the 3,455 low/moderate income owner households, 73% are cost burdened and 45.2% are severely cost burdened. The composition of low/moderate income households is as follows: 28.6% elderly, 26.1% small related, 10.4% households with one or more children 6 years old or younger, and 4.4% large related.

The rate that low and moderate income renter and owner households are cost burdened is as follows:

Renter: 26.5% small related, 3.7% large related, 17% elderly, 52.8% other households

Owner: 27.2% small related, 6.9% large related, 42.4% elderly, 23.2% other households

Similarities exist in the rates that low and moderate income households are severely cost burdened. The composition of households with a severe cost burden is as follows:

Demo

Renter: 20.4% small related, 2.6% large related, 18.3% elderly, 58.6% other households

Owner: 28.2% small related, 3.8% large related, 43.8% elderly, 24% other households

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	74,486	75,605	2%
Households	29,608	29,265	-1%
Median Income	\$69,544.00	\$70,041.00	1%

**Table 5 - Housing Needs Assessment Demographics**

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

**Number of Households Table**

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	4,310	3,070	3,995	2,765	15,115
Small Family Households	740	885	1,345	910	7,160
Large Family Households	105	160	230	130	910
Household contains at least one person 62-74 years of age	555	615	635	530	3,275
Household contains at least one person age 75 or older	505	405	540	335	1,310
Households with one or more children 6 years old or younger	210	384	585	380	1,880

**Table 6 - Total Households Table**

Data Source: 2011-2015 CHAS

**Housing Needs Summary Tables**

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	55	60	80	35	230	0	0	15	0	15
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	80	0	0	0	80	0	0	25	0	25
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	35	30	20	15	100	0	45	30	0	75
Housing cost burden greater than 50% of income (and none of the above problems)	2,315	1,015	220	100	3,650	685	470	385	240	1,780
Housing cost burden greater than 30% of income (and none of the above problems)	110	705	1,345	355	2,515	90	305	510	485	1,390

Demo

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	475	0	0	0	475	175	0	0	0	175

**Table 7 – Housing Problems Table**

Data 2011-2015 CHAS  
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	2,485	1,105	320	150	4,060	685	515	455	240	1,895
Having none of four housing problems	385	935	2,215	1,375	4,910	105	515	1,000	1,005	2,625
Household has negative income, but none of the other housing problems	475	0	0	0	475	175	0	0	0	175

**Table 8 – Housing Problems 2**

Data 2011-2015 CHAS  
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	520	545	530	1,595	130	185	370	685
Large Related	65	95	60	220	15	50	110	175
Elderly	320	390	315	1,025	459	329	280	1,068

Demo

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Other	1,665	770	745	3,180	170	245	170	585
Total need by income	2,570	1,800	1,650	6,020	774	809	930	2,513

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS  
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	460	295	25	780	130	150	160	440
Large Related	65	35	0	100	15	35	10	60
Elderly	290	230	180	700	380	174	130	684
Other	1,620	525	95	2,240	160	130	85	375
Total need by income	2,435	1,085	300	3,820	685	489	385	1,559

Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS  
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	100	25	20	0	145	0	45	30	0	75
Multiple, unrelated family households	15	10	0	15	40	0	0	25	0	25
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	115	35	20	15	185	0	45	55	0	100

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS  
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source  
Comments:

**Describe the number and type of single person households in need of housing assistance.**

In Evanston there are 10,326 single person households, 35.9% of all households. Of the single person households, 3,670 or 12.8% are seniors 65 years old and over. The City of Evanston elderly population has decreased, however the number of elderly households is expected to rise in the coming years. The limited incomes and resources of seniors and the high cost of housing in Evanston presents housing challenges to this community and a greater need for housing assistance. Additionally, the average single-person household spends a larger percentage of their income on housing. Based on this factor coupled with the high cost of housing in Evanston, many single person households, including seniors, are in need of more affordable housing options and assistance.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

The YWCA Evanston North/Shore operates a 32 bed homeless shelter for individuals and their families who are victims of domestic violence. In FY 2018, the YWCA provided shelter to 173 clients (102 women and 71 children). Families can stay at the shelter for up to 90 days. To help stabilize families exiting the shelter, the YWCA operates a 15-unit apartment building. Families can stay for as long as they need to identify and secure stable housing. In FY 2018 the supportive housing program housed 16 women and 11 children for a total of 27.

Per the most recent data available, there are 6 elderly households & 46 households with one or more persons with a disability waiting for an accessible unit to become available. This information is for Public Housing (Scattered Sites) only. The waiting list is currently closed and offers some insight into the need for accessible housing for those with disabilities. High demand for the limited number of accessible units in Evanston demonstrates the lack of supply meeting demand.



### **What are the most common housing problems?**

The cost of housing and overall lack of affordability is by far the most common housing problem; over 40% of all households in Evanston are housing cost burdened. The continual increase in housing costs and the lack of affordable housing continues to put a strain on Evanston's low and moderate income population and contributes to their displacement out of the community.

Accessibility is an additional housing problem determined through consultation with various City departments and citizen participation. The advanced age of Evanston's housing stock and the growing number of elderly residents has resulted in a greater need for accessible housing for those with physical limitations.

### **Are any populations/household types more affected than others by these problems?**

The special needs population, including the elderly, is negatively impacted by housing costs and accessibility issues. This population generally subsists on a fixed income and does not have the resources to cope with rising housing costs and the cost of rehabbing housing to accommodate accessibility concerns. The City also recognizes that some minority populations, specifically those that have been excluded and marginalized by historical practices of institutionalized racism, have also been negatively burdened.

### **Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

Housing instability for low-income individuals and families with children is linked to poverty, unemployment, underemployment, domestic violence, a decline in public assistance, lack of affordable health care, unforeseen medical emergencies, mental illness, substance abuse, and chemical addiction. The lack of jobs for unskilled workers prevents many from earning a living wage and as a result many cannot secure housing. The prohibitive cost of market rate housing and lack of living wage jobs put many of Evanston's low-income individuals and families with children at risk of losing their housing and becoming homeless.

Mental illness and other disabilities afflict a number of low-income residents and could prevent them from earning a living wage. The limitations imposed by disabilities, a lack of jobs, affordable housing, and supportive services place many at risk of residing in shelters or becoming unsheltered.

## Demo

In Evanston, Emergency Solutions Grant (ESG) funds are subgranted to Connections for the Homeless and used to fund rapid re-housing programs that provide individuals and families with housing assistance and support services. Those served are extremely low income and are subsisting on Social Security Supplemental Security Income/Disability Income (SSI/DI) or low-wage jobs. Many require job training or education services to provide them greater employment opportunities and to prevent them from becoming homeless. The fluctuating availability of these forms of assistance, combined with the high cost of market rate housing, make it challenging for the individual or family to achieve financial independence before the end of their ESG assistance. Connections for the Homeless follows a progressive engagement model, offering only what is needed for individuals and families to become stable. Connections in partnership with the City is looking at ways to use ESG as a bridge to supportive housing for those who need it or as a bridge into the Tenant Based Rental Assistance Program for those families that could achieve financial stability following the completion of an associates degree or job training program.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

According to CHAS data for 2011-2015, there are 11,375 households with income less than or equal to 80% AMI; 7,925 are renters. Additionally, 9,860 or 69.7% of households at or below 100% AMI have at least 1 of 4 housing problems. The at-risk population is broken down as follows:

- Financial factors (3,000 – 4,000)
- This is based on the number of extremely low-income households (0-30% AMI) spending more than 50% of their income on rent. According to the 2007-2011 CHAS data, there are 2,005 such households in Evanston. Based on a household size of 1.5 to 2, this totals between 3,000 and 4,000 individuals.
- Social and personal factors (1,000-1,500)
- Persons leaving institutional care (prisons/jails, hospitals, etc.) dealing with domestic violence, child abuse or elder abuse, or aging out of foster care often confront a future with unstable housing. Formerly homeless persons/families who receive rental subsidies from our local agencies are also at-risk; if that funding were cut, these persons might again be homeless.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

The high cost of housing in Evanston creates instability and an increased risk of homelessness for those households housing cost burdened. As previously shown, households that are low-income, predominantly renters, are at the greatest risk. The large amount of household income going towards

housing costs results in the potential for any disruption, such as a job loss, to put a family or individual at an increased risk of becoming homeless.

## **Discussion**

Evanston's low and moderate income population are housing cost burdened because of a lack in education, job training, jobs that pay a living wage, and the cost of maintaining housing in Evanston. There exists a high need for supportive services aimed at low and moderate income individuals for the purpose of increasing economic and educational opportunities. Additionally, other social services including mental health services are needed to maintain a stable environment for those low and moderate income residents most at risk of becoming homeless. The wages earned by unskilled laborers do not align with the market rate cost of housing. Many residents on fixed incomes such as the elderly cannot afford to maintain their housing whether it's general upkeep or payment of property taxes. The Market Analysis section of the Consolidated Plan provides an in-depth examination of housing costs and the availability of affordable housing.

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

The HUD definition of disproportionately greater need is when the members of a racial or ethnic group at an income level experience housing problems at a greater rate (10% or more) than the income level as a whole. According to the 2010 U.S. Census, Evanston’s total population is 65.6% White, 18.1% African American, 9% Hispanic, and 8.6% Asian. The 2018 Census QuickFacts for Evanston states that 66.8% of the population is White, 16.9% African American, 11.5% Hispanic and 9.6%. These updated data demonstrate an increase in the White, Hispanic and Asian populations, and a decrease in Evanston’s African American population. Evanston’s population is one of the most racially and ethnically diverse among Chicago’s North Shore communities and does show some incidences of disproportionately greater need.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,370	295	650
White	1,785	110	315
Black / African American	680	150	80
Asian	495	20	180
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	315	15	70

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

**30%-50% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,635	440	0
White	1,430	260	0
Black / African American	705	115	0
Asian	215	50	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	250	0	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

**50%-80% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,630	1,360	0
White	1,385	680	0
Black / African American	690	385	0
Asian	215	110	0
American Indian, Alaska Native	10	0	0
Pacific Islander	0	0	0
Hispanic	255	160	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

**80%-100% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,225	1,540	0
White	775	885	0
Black / African American	175	360	0
Asian	75	120	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	195	170	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

**Discussion**

In the City of Evanston, the total number of households under 80% AMI experiencing one or more of four housing problems is 8,635, a significant increase, or 29.5% of the total number of households, 29,265. A disproportionate need exists among Asian and African American households at 0%-30%, as well as among African American households at 30%-50% and 50%-80% of area median income.

Disproportionate Need: 0%-30%AMI

78.2% or 3,370 total of households experience one or more of the four housing problems

Of the 3,370 total number of households experiencing one or more of the four housing problems, 15% are Asian households and 20.2% are African American households

Disproportionate Need: 30%-50% AMI

85.8% or 2,635 total of households experience one or more of the four housing problems

Of the 2,635 total number of households experiencing one or more of the four housing problems, 27% are African American households

Disproportionate Need: 50%-80%

## Demo

65.8% or 2,630 of households experience one or more of the four housing problems

Of the 2,630 total number of households experiencing one or more of the four housing problems, 26.2% are African American households

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

As mentioned in Section NA-15, Evanston’s population is racially diverse. According to the 2010 Census, of the total population, the largest racial groups are 65.6% White, 18.1% African American, 9% Hispanic, and 8.6% Asian. The tables below show the severe housing problems by area median income (AMI), and by racial or ethnic group within those categories, who have one or more severe housing problems.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,170	490	650
White	1,695	195	315
Black / African American	590	240	80
Asian	485	30	180
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	315	15	70

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,620	1,450	0



<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
White	965	730	0
Black / African American	365	455	0
Asian	164	105	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	130	119	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**50%-80% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	775	3,215	0
White	390	1,680	0
Black / African American	140	930	0
Asian	105	215	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	80	340	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**80%-100% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	390	2,380	0
White	245	1,410	0
Black / African American	60	480	0
Asian	0	195	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	80	285	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**Discussion**

The total number of households experiencing one or more of the four severe housing problems is 5,955, or 20.1% of the total number of households, 29,625. A disproportionate need exists among Asian households at 0%-30%, as well as among Asian and African American households at 30%-50%, and among Asian households at 50%-80% of area median income.

**Disproportionate Need: 0%-30%AMI**

73.5% or 3,170 households experience one or more of the four severe housing problems

Of the 3,170 total number of households experiencing one or more of the four housing problems, 15.3% are Asian households

**Disproportionate Need: 30%-50%AMI**

52.8% or 1,620 households experience one or more of the four severe housing problems

Of the 1,620 total number of households experiencing one or more of the four housing problems, 10.1% are Asian households and 22.5% are African American households

**Disproportionate Need: 50%-80%AMI**

## Demo

19.4% or 775 households experience one or more of the four severe housing problems

Of the 775 total number of households experiencing one or more of the four housing problems, 13.5% are Asian households

**NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction:**

HUD presumes that a household that pays up to 30% of their income for housing costs is not cost burdened. Any percentage above 30% but below 50% is considered a housing cost burden, and if a household is paying 50% or more of their household income on housing, then that household is experiencing a severe housing cost burden.

**Housing Cost Burden**

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	16,880	5,670	6,050	675
White	12,485	3,355	3,520	330
Black / African American	2,275	1,320	1,125	80
Asian	1,075	320	725	190
American Indian, Alaska Native	0	10	0	0
Pacific Islander	0	0	0	0
Hispanic	830	590	525	70

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2011-2015 CHAS

**Discussion:**

In Evanston, about 57.7%, or 16,880, of all households are not cost-burdened spending less than or equal to 30% of their income on housing. Approximately 19.4% of all households are cost-burdened, spending between 30%-50% of their income on housing, and 20.7% are severely cost burdened, spending than 50% on housing costs.

**Disproportionate Need: Housing cost burden >50%**

20.7% of all households have a severe cost burden

## **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

### **Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

As stated in the previous sections, in households with one or more housing problems, a disproportionate need exists among Asian and African American households at 0%-30% of area median income, as well as among African American households at 30%-50% and 50%-80% of area median income. In addition, in households with one or more severe housing problems, a disproportionate need exists among Asian households at 0%-30% of area median income, as well as among Asian and African American households at 30%-50%, and among Asian households at 50%-80% of area median income.

### **If they have needs not identified above, what are those needs?**

The Hispanic community of Evanston has been growing steadily from 4,539 in the 2000 Census to 6,739 in the 2010 Census, or a 32.6% increase. Targeted outreach to the Spanish-speaking community during the Consolidated Planning process highlighted needs not identified.

The Hispanic community within Evanston is relatively underrepresented within the civic government. As noted from consultation with the community, residents with English as their second language are more prone to facing housing discrimination. Non-English speaking community members are less likely to engage with the City government and seek services or support. The City has made concerted efforts to accommodate these community members through Spanish language 311 services, City staff fluent in numerous languages, and the ability to translate the City's website into multiple languages via Google Translate.

### **Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

According to the Analysis of Fair Housing Issues in the Cook County Assessment of Fair Housing (AFH), there are no Racially or Ethnically Concentrated Areas of Poverty in the City of Evanston. However, the Chicago Metropolitan Agency for Planning (CMAP) identified Economically Disconnected Areas (EDAs), which are areas that have a greater than average concentration of minority or limited English proficiency populations. Approximately 7% of Evanston's population lives in EDAs. Community engagement for the AFH indicates that Evanston's 5th Ward has higher poverty levels than the rest of the jurisdiction, as well as a significant population hovering right above the poverty line. This population may be made up of largely single earner households with workers in low-wage, part-time jobs.

## NA-35 Public Housing – 91.205(b)

### Introduction

The Housing Authority of Cook County (HACC) is the public housing authority that serves suburban Cook County. The City works with the HACC to ensure that the goals and strategies from the 5 year and annual PHA plan are reflected in the City's efforts to address and improve public housing issues. Due to the large geographic area served by the Housing Authority of Cook County, it can be difficult to tailor jurisdiction specific goals and strategies. The City of Evanston works diligently with the HACC to create the best strategies to address public housing needs. HACC owns and operates 2,026 units of public housing, 244 of which are located in Evanston. The Perlman and Walchirk apartment buildings offer 100 and 99 units, respectively, of single bedroom housing for seniors and persons with disabilities. The public housing scattered site units operated by the HACC consist of seven two-story townhome buildings that house families in two, three, or four-bedroom units.

The Housing Authority of the County of Cook also administers the Housing Choice Voucher program. According to the most recent available data, there were 575 Housing Choice Voucher holders residing in Evanston. This marks a slight decrease from 656 Housing Choice Voucher holders in living in Evanston at the time of the last Consolidated Plan in 2015. Voucher holders continue to be concentrated in West Evanston, particularly in the census tracts 8092, 8103.01, and 8103.2. The City is working with landlords to encourage the greater acceptance of Housing Choice Vouchers not only in these areas, but throughout the entire community.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	1,651	11,832	64	11,594	91	54	0

Table 22 - Public Housing by Program Type

Demo

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

**Characteristics of Residents**

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	10,627	13,418	14,350	13,395	13,647	11,962
Average length of stay	0	0	7	8	0	8	0	5
Average Household size	0	0	1	2	1	2	1	4
# Homeless at admission	0	0	9	21	0	3	16	2
# of Elderly Program Participants (>62)	0	0	897	2,179	42	2,120	12	0
# of Disabled Families	0	0	491	2,337	2	2,268	48	12
# of Families requesting accessibility features	0	0	1,651	11,832	64	11,594	91	54
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**Race of Residents**

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	705	1,981	19	1,913	27	14	0
Black/African American	0	0	900	9,786	43	9,620	62	40	0
Asian	0	0	44	37	2	34	1	0	0
American Indian/Alaska Native	0	0	0	15	0	15	0	0	0
Pacific Islander	0	0	2	13	0	12	1	0	0
Other	0	0	0	0	0	0	0	0	0

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**Ethnicity of Residents**

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	33	321	0	311	2	5	0
Not Hispanic	0	0	1,618	11,511	64	11,283	89	49	0

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Table 25 – Ethnicity of Public Housing Residents by Program Type**



Demo

**Data Source:** PIC (PIH Information Center)

**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

According to the most recent data obtained from the Housing Authority of Cook County, the waiting lists for all of the public housing units located within Evanston are closed. The total number of those on the waiting list is 209 for the scattered site units. The vast majority of those on the waiting list are African American at 76%, followed by White at 9%, Asian at 1%, Hispanic or Latino makes up 16%, unknown race at 0%, and American Indian at 0.0% makes up of the waiting list. Additionally, there are 6 elderly households & 46 households with one or more persons with a disability waiting for an accessible unit to become available.

The City supported the HACC's application for Low Income Housing Tax Credits (LIHTC) for substantial rehab of the Walchirk and Perlman apartments that was submitted to the Illinois Housing Development Authority (IHDA) in August of 2013. Substantial rehab of these public housing units resulted in greater accessibility for current and future residents. The rehabilitation of all units included 20 accessible, 20 adaptable and 4 sensory impairment units. The City collaborated with Cook County to provide gap funding for the LIHTC application. The HACC received a LIHTC award, and the City committed \$150,000 of HOME funds approved by City Council on September 22, 2014. The City lacks the capacity to provide additional gap funding for a development project of this size but can use its limited resources to leverage needed funds from Cook County.

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

The City estimates there is an unmet need for public housing resources, particularly for tenant based vouchers, units targeted towards large families, and accessible units. The HACC has a total waiting list of over 1,880 and it is currently closed to new applicants. The demand for affordable housing continues to outweigh the supply. The City will continue to work with the HACC regarding its Housing Choice Voucher program, scattered site family housing and elderly/disabled housing, to maintain and increase affordable housing.

Public housing and housing choice voucher holders show great need for economic opportunities and supportive services. Consultation with City staff and service providers highlighted the need for medical, mental health, youth, and child care services. Those living in assisted housing are reliant upon service providers and the City due to a lack of meaningful employment and educational opportunities. In Evanston the average annual income for residents in public housing is \$10,627 and \$14,350 for residents in the Project-Based Voucher Program compared to \$70,041 for all of Evanston.

**How do these needs compare to the housing needs of the population at large**

## Demo

The population at large and residents of public housing and housing choice voucher holders share a similar need for an increased affordable housing supply in Evanston. The number of individuals on the closed waiting list, 1,880, and the percentage of Evanston households that are cost burdened, 40%, illustrates this point. Additionally, assisted housing and low and moderate income residents in Evanston have an unmet need for affordable units capable of comfortably housing a large family. The vast majority of assisted housing in Evanston is geared towards the elderly and those with disabilities.

The residents of public housing and the population at large have additional unmet needs in supportive services. Job training, medical, mental health, youth, and child care services are needed by community residents and those assisted through the HACC. Increased services will be beneficial to all of Evanston.

### **Discussion**

The HACC participates in the Chicago Regional Housing Choice Initiative (CRHCI), a regional program to implement HUD's "access to opportunity" principles. In May 2011, HACC and six other area public housing authorities joined the Chicago Metropolitan Agency for Planning, the Metropolitan Mayors Caucus, the Metropolitan Planning Council, workforce investment boards and other civic agencies in initiating a scaling-up of existing efforts to create regional housing choice for voucher households. The same seven housing authorities continue to administer the Regional Housing Initiative (RHI), a unique collaboration to pool project-based vouchers to support regional development and preservation priorities. Both CRHCI and RHI remain national models for removing barriers to housing choice and increasing access to affordable housing.

The RHI was formed to provide financial incentives in the form of operating subsidies to developers and owners of quality rental housing. The public housing authorities involved have agreed to make project based subsidies (RHI vouchers) available for up to 335 rental housing units in developments throughout the metropolitan region in order to address an unmet need for quality affordable rental homes near good jobs, transit options, quality schools and other attractive amenities. RHI provides project-based subsidies that can serve as a dependable funding stream that can keep apartments affordable for 15 or more years. The vouchers generally fund the difference between fair market rents and the tenant's rent payment. Tenants are required to pay 30% of gross monthly income, plus a utility allowance. RHI is intended to foster economically diverse living environments; therefore, no more than 25% of a development can receive RHI vouchers, except in the case of special needs housing. RHI vouchers/ units can constitute 100% of the units in a development of supportive housing for people with disabilities.

## NA-40 Homeless Needs Assessment – 91.205(c)

### Introduction:

The following section presents data on homelessness in the City of Evanston and suburban Cook County from the Alliance to End Homelessness in Suburban Cook County Continuum of Care of which the City of Evanston is a part. Jurisdiction specific data in select categories was available from the 2018 Homeless Populations Point in Time Count (PIT). Data concerning the number of unsheltered homeless persons in Evanston for 2019 is unavailable because the unsheltered count is conducted in odd numbered years and not available by community.

The City currently uses the Emergency Solutions Grant, HOME, Community Development Block Grant and Mental Health Board funds to provide housing and services to homeless individuals and families, or those threatened with homelessness, as well as case management services, job counseling and placement/follow-up assistance. Mental health and substance abuse services are also provided to stabilize individuals’ lives and enable them to develop self-sufficiency.

### Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	324	0	591	438	540	207
Persons in Households with Only Children	1	0	100	23	29	279
Persons in Households with Only Adults	467	105	2,272	1,192	582	47
Chronically Homeless Individuals	121	21	494	0	108	47
Chronically Homeless Families	2	0	0	0	10	0

Demo

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Veterans	38	5	207	120	212	319
Unaccompanied Child	53	4	383	300	29	0
Persons with HIV	4	0	25	0	10	0

**Table 26 - Homeless Needs Assessment**

**Alternate Data Source Name:**

Point In Time Count 2018

**Data Source Comments:**

Indicate if the homeless population is: Has No Rural Homeless

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

Data for the number of days that persons experience homelessness is unavailable. Data was taken from the 2018 PIT Count from the Alliance to End Homelessness in Suburban Cook County Continuum of Care of which Evanston is a part. It is of use to examine the estimates of the number experiencing homelessness each year, those becoming homeless each year, and those exiting homelessness each year in order to gain a greater understanding of the nature of homelessness in suburban Cook County and Evanston.

The year covered in the data provided is from January 1, 2018 through December 31, 2018 and includes only data on persons served by programs in suburban Cook County who participate in the Homeless Management Information System (HMIS). It does not include persons served by programs targeted to survivors of domestic violence (DV) and/or who do not participate in HMIS. The estimated number of persons

## Demo

experiencing homelessness is the number of persons who were served by at least one homeless program during the year including homeless shelter and outreach programs and the unsheltered count. The estimated number of persons becoming homeless includes those persons in the HMIS database who entered into a homeless program during the year and had not been in a homeless program at any time during the 2 years prior to that entry. The estimated number of persons exiting homelessness is the number of persons entering a permanent housing program from a homeless situation plus the number of persons exiting a homeless program to a permanent destination during the year.

As seen in the table above every category of homeless persons is estimated to increase. The greatest increase is seen in the category of households with adults only with there being an estimated additional 1,192 people entering homelessness annually. The next highest increase is persons in households with adults and children, with approximately 438 additional persons becoming homeless each year. The third highest increase is unaccompanied children which has an estimated 383 additional persons becoming homeless each year. The fourth highest increase was among veterans with an estimated 120 becoming homeless annually. The lowest estimated increase is among persons with HIV at 25 persons.

Unaccounted for in the data are those homeless individuals and families that are couch surfing or doubled up. These families and individuals are part of a growing issue which is difficult to provide an accurate estimate of. Many live on an interim basis on relatives or friends couches or homes. The local homeless service provider, Connections for the Homeless, estimates up to 500 families in 2019 that are homeless and either couch-surfing or doubled up.

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	299	60
Black or African American	457	42
Asian	13	0
American Indian or Alaska Native	1	0
Pacific Islander	3	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	685	91
Not Hispanic	107	14

Data Source

Comments:

Point In Time Count 2018

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

According to the 2018 Point in Time Count (PIT) conducted by Alliance to End Homelessness in Suburban Cook County Continuum of Care, 8,215 unduplicated people in 5,997 households were served in 2018. In Evanston, 1,052 unduplicated residents were served in 859 households. In the Cook County CoC there were 50 veterans. 194 people diagnosed as severely mentally ill, 12 people diagnosed with HIV/AIDS, and 62 unaccompanied youth under 24 counted in the 2018 PIT . Out of the total 640 households, 16.4% were households without children, 83.4% were households with children. In Evanston homeless special populations include: 22 veterans, 152 diagnosed with severe mental illness, 48 are chronic substance abusers, 8 persons with HIV/AIDS, 136 victims of domestic violence (adults only), 243 persons with a disability, and 11 are age 62 and over.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

Based on data from the 2018 PIT, of the total 1,052 homeless persons counted in Evanston, 70% were Black or African American, 20% were White, 2% identified as Black and White, 5.1% identified as Other/Multi-racial, 1.7% identified as Asian, 7 people identified as American Indian or Alaska Native, and 1 person identified as Native Hawaiian/Pacific Islander. Persons of Hispanic or Latino ethnicity constituted 11% of the total homeless population.

When looking at data for the entire area covered by the Cook County Continuum of Care, Evanston shows some similarities and differences. In suburban Cook County, of the total 873 homeless persons

counted in 2018, 50.7% were Black or African American, 45% were White, 1.5% were Asian, 3.2% were multiple races, and .6% were American Indian/Alaskan Native or Native Hawaiian/Pacific Islander. There are more African Americans affected by homelessness in Evanston than in the rest of suburban Cook County.

### **Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

According to data from the local homeless service provider Connections for the Homeless, between January 1, 2018 and December 31, 2018 Connections' drop-in program worked with 654 unsheltered homeless. They moved 29 into their transitional shelter. They moved 41 people directly from the street into permanent housing.

The YWCA, which runs the local domestic violence shelter, sheltered approximately 173 women and children. The shelter served 36 families, 102 adults and 71 children.

Family Promise sheltered approximately 60 individuals in 15 families in their nightly shelter program.

Evanston has seen dramatic growth in its McKinney-Vento children. District 65 reported 150 students considered homeless under the federal definition in the 2018 school year (fall 2017-summer 2018). Of those students, 67% were living in shared housing and 33% were in emergency or transitional shelters. As far as we know all of these children are part of intact families who are doubled up or in shelters. We are unaware of any that are literally homeless. Connections is working with approximately 60 children in its permanent supportive housing program and with another 45 in a new transitional housing program that we are funding using HOME dollars.

There is also a considerable chronically homeless population in Evanston, which has traditionally had great difficulty in obtaining or retaining housing. In 2018, Connections worked with 204 such individuals.

The total number of unsheltered homeless persons counted in the 2018 PIT Count for suburban Cook County was 92 (data is unavailable for 2019). Of the total 23 unsheltered households, none of the households contained children. Examining homeless subpopulations from the PIT count shows that 23 were chronically homeless individuals, 3 were Veterans, 29 were severely mentally ill, 15 were chronic substance abusers, and 2 were victims of domestic violence.

### **Discussion:**

Presenting an accurate portrayal of Evanston's homeless population is difficult due to the nature of homelessness and the limited scope of the PIT count. As previously stated, Evanston has a large population of homeless families and children that are underrepresented.



Continued outreach and support services are needed to decrease homelessness and to assist those families and individuals unaccounted for by traditional data gathering means. It is anticipated that homelessness will continue to be an issue due to housing cost burden and the limited supply of affordable housing units.

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

The special needs population consists of persons who are not homeless but for various reasons, require assistance and supportive housing. This includes the elderly and frail elderly; persons with mental, physical, and/or developmental disabilities; persons with alcohol or drug addiction; persons with HIV/AIDS and their families; and victims of domestic violence, dating violence, sexual assault and stalking. Given the extremely high cost of housing in Evanston and the surrounding areas, provision of affordable housing for these special needs populations has been challenging.

### **Describe the characteristics of special needs populations in your community:**

As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work.

Across Evanston, 9% of the total population aged five and older (6,399 people) reported a disability in 2017. The most common types of disabilities among persons ages 18 to 64 were cognitive or ambulatory; referring to difficulty moving from place to place that makes it impossible or impractical to walk as a means of transportation. This type of difficulty often translates to a need for accessible housing. Those aged 65 and older, comprise 49% of the population with a disability.

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

Based on consultation and input from area service providers and the City of Evanston Health Department, it has been determined that:

- There is a need for permanent supportive housing to address the needs of the homeless, households at imminent risk of becoming homeless, and/or special needs clients.
- There is a need for new construction / acquisition / rehabilitation of rental housing for lower income households, including large households, small households and special needs households.
- There is a need for additional support services that assist persons with special needs.

- There is a need for mental health services for those with special needs and those that have been victims of violence and/or family trauma.
- There is a need for greater communication and coordination among the various service providers and the City of Evanston to prevent those with special needs and special assistance from falling through the gaps.
- Multilingual services are needed for the non-English speaking special needs population.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

According to the most recently available Illinois AIDS/STD Monthly Surveillance Update report from September 2018, there were a total of 660 diagnosed cases of HIV infection in all of Cook County since January 2018 to September 30, 2018. Of the total cases reported, 5 were reported from the Evanston Health Department. AIDS cases diagnosed in all of Cook County from January 2018 to September 2018 numbered 295 of which 2 were in Evanston. The number of people living with HIV in Cook County totaled 8,932 with 64 in Evanston. In addition, 4,459 people were living with AIDS in Cook County and 40 were in Evanston.

**Discussion:**

Special needs groups with high priority housing needs within Evanston include elderly and frail elderly persons, and persons with mental health services needs. Along with low-income and housing related issues, including a high housing cost burden, this population struggles for a decent quality of life that includes basic necessities, adequate food, and medical care. Coordination and communication among service providers has continually been mentioned as a way of creating a network in Evanston to assist the special needs population.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction’s need for Public Facilities:**

The following public facilities needs were identified by consultation with the City of Evanston's Public Works, Utilities, and Parks Departments along with community input from a community needs assessment survey with 796 completed responses.

- Affordable housing and housing services
- Facilities for homeless persons
- Park/Recreational facilities and facilities for youth
- Street and alley paving

### **How were these needs determined?**

The City's needs for public facilities were determined through a number of processes with input from City Departments such as Public Works, Community Development, Parks, Utilities, and a community needs assessment survey. Preparation of the City's Consolidated Plan and First Year Action Plan helped to identify needed public facilities in the 5th ward of Evanston where the City's highest concentration of low- to moderate-income residents reside. The processes to develop these plans included extensive public input and consultation with agencies/organizations.

Access to broadband and broadband services were included in the survey, 26.6% of respondents ranked broadband access as a high need. The Evanston Public Library offers a Wi-Fi Hotspots for Internet Services On The Go program. Residents 16 or older who are cardholders are able to participate in the Wi-Fi Hotspot lending program. Devices can be rented for up to 4 weeks and has greatly improved access for residents. The library had 100 devices in 2018 and got 45 more in 2019. In 2018 over 400 people accessed Wi-Fi hotspots. The City will continue to partner with the Library to see how the program could expand.

### **Describe the jurisdiction’s need for Public Improvements:**

The following public improvements needs were identified by stakeholders at consultation meetings, community meetings, and surveys conducted by the Community Development Department.

- Paving/resurfacing of streets and alleys
- SNAP lighting

- Sidewalks
- Flood/Drainage Improvements
- Sustainable infrastructure improvements (higher efficiency)

### **How were these needs determined?**

The City's needs for capital improvements were determined through a number of processes with input from City Departments such as Public Works, Community Development, Utilities, and a community priority needs survey. Preparation of the City's Consolidated Plan and First Year Action Plan helped to identify needed public improvements on the West and South sides of Evanston where the City's highest concentration of low- to moderate-income residents reside. The processes to develop these plans included extensive public input and consultation with agencies/organizations.

### **Describe the jurisdiction's need for Public Services:**

The following public services needs are available within the community through the City and service providers. However, funding levels do not meet the demand for services. Due to the CDBG regulations limiting public services funding to 15% of the total grant amount, prioritization of CDBG funding is essential to meeting the most urgent of the community.

The following public services needs were identified by consultation with the City of Evanston's Health and Parks Departments along with community input from the community needs assessment survey.

- Youth services including access to summer programs
- Housing services
- Benefits enrollment including health insurance, SNAP, and additional resources
- Financial Literacy
- Dental services
- Health services

Services used by low to moderate income residents include Health services (access to a PCP, health specialists, and dental services) and medical prescription payment assistance, early child care and youth services, assistance enrolling in additional benefits and use of food banks. The City will continue to provide support for services residents use.

### **How were these needs determined?**

The City's needs for capital improvements and public facilities were determined through a number of processes with input from City Departments such as Health, Parks, and a community priority needs survey. Preparation of the City's Consolidated Plan and First Year Action Plan helped to identify needed public services of the City's low- to moderate-income population. The processes to develop these plans included extensive public input and consultation with other jurisdictions and agencies/organizations.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

The high cost of housing in Evanston and the Chicago area continues to be a barrier to securing stable housing for many low and moderate income residents. Evanston is a built out community with little vacant land, so growth must be achieved primarily through redevelopment and increased density. The housing market expanded and grew during the economic growth of the 2000s, but contracted after the Great Recession of late 2008. Most of the growth in housing units and overall development was in the form of mixed-use condominium buildings in Evanston's downtown. The significant growth experienced in that central area was not seen in other parts of the City, particularly in west and south Evanston. The housing market contracted substantially in the foreclosure crisis of 2008, with south and west Evanston neighborhoods particularly impacted.

These same neighborhoods experienced higher levels of job losses than the rest of the city. Unemployment, underemployment, and the high cost of living are factors that contribute to the struggles of low and moderate income residents in Evanston. The following sections illustrate the composition and conditions of Evanston's housing market and economy.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

The following section details some of the unique characteristics of Evanston's housing stock.

### Unit Size by Tenure

Evanston's housing units differ substantially based on tenure. Ownership units are predominantly larger, with more bedrooms, as detailed in the table below. The number of rental units with three or more bedrooms is about 17.4% of the ownership units, highlighting the lack of rental available for larger families.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	9,650	30%
1-unit, attached structure	1,790	6%
2-4 units	4,550	14%
5-19 units	6,970	22%
20 or more units	9,160	28%
Mobile Home, boat, RV, van, etc	35	0%
<b>Total</b>	<b>32,155</b>	<b>100%</b>

Table 27 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	25	0%	1,295	10%
1 bedroom	925	6%	4,930	37%
2 bedrooms	4,835	30%	5,185	39%
3 or more bedrooms	10,280	64%	1,785	14%
<b>Total</b>	<b>16,065</b>	<b>100%</b>	<b>13,195</b>	<b>100%</b>

Table 28 – Unit Size by Tenure

Data Source: 2011-2015 ACS



**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

Evanston has 703 housing units that were developed with federal, state, or local funds. There are a total of 286 Low Income Housing Tax Credit units, with 9 units located at 818 Crain Street, 48 at 319 Dempster Street (Claridge Apartments), 28 in Emerson Square at Foster Street and Ashland Avenue, and 201 units at Perlman and Walchirk Apartments that were rehabbed through the Rental Assistance Demonstration (RAD) program that uses LIHTC funds for the substantial rehab of deteriorating public housing buildings. These units are restricted to low and moderate income residents; some units are designated for persons with disabilities.

There are 551 HUD multifamily units and Project Based Section 8 contracts located in Evanston, including many of the LIHTC units. Of these units, 107 are at Ebenezer Primm Towers (1001 Emerson) and 76 at Jacob Blake Manor for low income seniors, 21 are at Evanston Apartments (824-836 Dobson) for seniors and the disabled, 30 are at Oak Tree Village (1471 Foster) targeted for families, 33 at the Hill Arboretum Apartments (2040 Brown) for persons with disabilities, 199 in Perlman and Walchirk Apartments for low income seniors and the disabled, 26 at Emerson Square for families, 43 at 319 Dempster Avenue, and 16 in the new 16-unit permanent supportive housing building owned by Housing Opportunities for Women that was completed in 2019.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

According to the Multifamily Assistance and Section 8 Contracts database, Section 8 contracts for two housing developments, Ebenezer Primm Towers and Evanston Apartments, were renewed in 2015. 818 Crain entered into a new PBV agreement with IHDA, so those units are not at risk. The 199 units at Perlman and Walchirk are no longer public housing, but have 30-year affordability requirements from the LIHTC investment and have PBV from the Housing Authority of Cook County, so are not at risk. Oak Tree Village may be at greatest risk because it is owned by a for profit entity. Additional information is being sought relating to this development, which was constructed with LIHTC and currently has PBV for all 30 units.

**Does the availability of housing units meet the needs of the population?**

There is insufficient affordable housing to meet the needs of low and moderate income people currently living in Evanston. There are 1,880 people on the waiting list for public housing. When combined with

the high cost of housing and the number of people paying more than 30% of their income towards housing, this is evidence that the number of low and moderate income households in Evanston significantly exceeds the number of affordable housing units. Although the multitude of public transit options in Evanston makes it appealing to low and moderate income residents because it reduces the need for a car, 40% of all households are housing cost burdened or severely cost burdened. Over one third of residents are negatively impacted by the high cost of housing.

The fact that there are 1,880 people on the waiting list for public housing coupled with the high cost of housing and the number of people paying more than 30% of their income towards housing is evidence that the number of affordable housing units is not meeting the needs of Evanston's low and moderate income population. The multitude of public transit options within Evanston increases housing demand from low and moderate income residents due to the ability to travel around the Chicago region without a car. In Evanston, 40% of all households are cost burdened or severely cost burdened. Over a third of the community is negatively impacted by the high cost of housing and more affordable housing units will only work towards alleviating the situation.

### **Describe the need for specific types of housing:**

Housing that is affordable to low-income and extremely low-income households is needed to reduce the housing cost burden and enable them to maintain stable housing. In addition, housing that is accessible to persons with disabilities and low income seniors, particularly the frail elderly, is very limited. Additional supportive housing for persons with mental illness, developmental disabilities and other disabling conditions is also needed. Likewise, affordable housing for families with children remains a need throughout the community as evidenced through consultation with service providers and citizen input.

### **Discussion**

The City is partnering in the regional Assessment of Fair Housing (AFH) for which Cook County is the lead agency and Enterprise will provide staffing and technical assistance. The City expects to have data and most of the conclusions of this AFH to inform the development of its 2020-2024 Consolidated Plan. If the AFH is not completed prior to the submission of the City's new ConPlan, the City will review the final AFH when completed and amend its ConPlan as needed.

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

Housing costs for renters have risen dramatically since 2009. However, due to the housing crash of 2008, the median home value was still down by 12% at \$348,600 in 2015 from \$394,800 in 2009. The economic downturn resulted in reduced home values, with detached single-family homes selling for 19% less in 2012 than in 2008 and attached single family homes for 33.7% less. However, home values are on the rise. At the same time rents have risen by a significant 16%, from \$972 in 2009 to \$1,127 a month in 2015 (not adjusted for inflation). Evanston is an opportunity community for Section 8 Voucher holders because of its excellent schools, transportation and economic opportunity. However, rents significantly exceed the median rents in suburban Cook County so it is considered an exception community where eligible rents are higher than in other parts of the county in order to enable voucher holders to secure housing here.

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	394,800	348,600	(12%)
Median Contract Rent	972	1,127	16%

Table 29 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	838	6.4%
\$500-999	4,620	35.0%
\$1,000-1,499	4,250	32.2%
\$1,500-1,999	2,040	15.5%
\$2,000 or more	1,455	11.0%
<b>Total</b>	<b>13,203</b>	<b>100.0%</b>

Table 30 - Rent Paid

Data Source: 2011-2015 ACS

### Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	440	No Data
50% HAMFI	1,300	480

<b>% Units affordable to Households earning</b>	<b>Renter</b>	<b>Owner</b>
80% HAMFI	6,250	1,830
100% HAMFI	No Data	3,060
<b>Total</b>	<b>7,990</b>	<b>5,370</b>

**Table 31 – Housing Affordability**

Data Source: 2011-2015 CHAS

## Monthly Rent

<b>Monthly Rent (\$)</b>	<b>Efficiency (no bedroom)</b>	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>3 Bedroom</b>	<b>4 Bedroom</b>
Fair Market Rent	879	1,014	1,180	1,501	1,794
High HOME Rent	879	1,014	1,180	1,420	1,564
Low HOME Rent	741	793	952	1,100	1,227

**Table 32 – Monthly Rent**

Data Source: HUD FMR and HOME Rents

## Is there sufficient housing for households at all income levels?

Evanston has an ample supply of housing for those who are not low or moderate income. The significant increase in luxury and market rate units in the downtown and along transit corridors provides multiple options for higher income renters and homeowners. However, the increase in higher priced rental and owner properties coincided with a steep decline in the number of affordable units for low and moderate income residents.

The escalation of rents and property taxes contribute to the growing housing cost burden and is pricing long-term residents, particularly seniors, out of Evanston and making it difficult for many young families, including those who work in Evanston, to locate here.

## How is affordability of housing likely to change considering changes to home values and/or rents?

Housing affordability is expected to diminish in Evanston based on continuing increases in both property values and rents and no foreseeable decline in the immediate future or longer term. Evanston's low and moderate income population will continue to be priced out of their community as home prices and rental rates rise. Long-time homeowners living on fixed incomes, primarily seniors, are increasingly at risk of displacement because they can no longer afford to pay rising property taxes, utilities and afford to maintain their homes.

## **How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

The median contract rent in Evanston was \$1,127 in 2015, significantly above the HUD Fair Market Rent for a one-bedroom apartment, which was \$1,014. A household with an income at 60% of the area median can afford only an efficiency or one-bedroom unit; larger units are unaffordable, restricting housing opportunities for larger families and families with children.

To address the high cost of renting in Evanston and its disparate impact on low and moderate income households, particularly those with children, the City of Evanston has allocated resources to provide rental assistance (Tenant Based Rental Assistance Program), combined with supportive services, including education/job training for heads of households to increase their earning capacity and enable them to afford market rate housing following the subsidy, thus breaking the cycle of poverty. In addition, increasing funding to preserve existing affordable housing will provide affordable units for lower income households.

### **Discussion**

The National Low Income Housing Coalition provides data on Fair Market Rent (FMR) and rental affordability in U.S. counties and cities. In 2013, FMR in Cook County for a two-bedroom apartment was \$966. To afford that and not exceed 30% of income on housing, a household had to earn \$3,220/month, or \$38,640 annually. Based on a 40-hour work week, 52 weeks per year, this requires an hourly wage of \$18.58. In Cook County, a minimum-wage worker earns \$8.25/hour. To afford the FMR for a two-bedroom apartment, a minimum-wage earner must work 90 hours/week, 52 weeks/year. NLIHC estimates that 56% of Cook County renters cannot afford the two-bedroom FMR. Monthly Supplemental Security Income (SSI) payments for an individual are \$710 in Cook County. If SSI is the sole source of income, \$213/month rent is affordable, but the FMR for a one-bedroom is \$815.

A method to determine housing market affordability is to calculate the percent of homes that could be purchased by households at the median income. Affordability for racial or ethnic groups in the City may be determined this way. The following assumptions were used to determine affordability: 1) 30-year fixed rate mortgage at a 4.0% interest; 2) 10% down payment; 3) principal, interest, taxes and insurance (PITI) plus consumer debt do not exceed 35% of gross income, a threshold used by banks; 4) property taxes at a combined median tax rate of 2.27%; 5) consumer debt (credit cards, car payment, etc.) averaged \$500 per month.

The 2012 median sales price for a single-family detached home in Evanston was \$440,000 and the median household income was \$68,292, resulting in a maximum affordable home price of \$262,500.

Based on this, the average Evanston household cannot purchase half of the for-sale homes. It is nearly impossible for low/moderate income households to purchase in Evanston without assistance. Additionally, the cost of utilities, property taxes, and other housing costs, prevents many households from ownership. Seniors with fixed incomes and the unemployed/ underemployed are most impacted. Stagnating incomes and increasing housing costs necessitate intervention by the City to stem displacement of low and moderate residents and make Evanston the most livable city for all its residents.

## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

### Introduction

This section discusses the condition of housing stock in Evanston. HUD defines substandard housing using conditions similar to those in the Needs Assessment. Housing units are considered substandard if they have one or more of the following conditions: 1) lack of complete plumbing facilities; 2) lack of complete kitchen facilities; 3) more than 1 person per room; or 4) a housing cost burden greater than 30%. The chart below shows the number of units in Evanston with one or more of these conditions, and therefore substandard.

### Definitions

The City of Evanston Code Enforcement Program has adopted the International Code Council’s 2012 International Property Maintenance Code and uses it to determine what constitutes a code violation. The number of code violations is used to identify deteriorating and deteriorated properties. A housing unit with 0-5 minor code violations is considered a “standard unit” and any housing unit with more than 16 minor code violations or any structural systems violations is considered substandard. Units with 6-15 minor violations are considered “in need of minor repair.” Units with 16 or more violations are considered to be “in need of critical repair.” 16-35 violations are considered to be deteriorating and units with more than 35 violations are considered to be deteriorated. A structural review and life safety assessment is undertaken in order to determine if a building should be demolished.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	5,050	31%	6,575	50%
With two selected Conditions	115	1%	385	3%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	10,900	68%	6,235	47%
<b>Total</b>	<b>16,065</b>	<b>100%</b>	<b>13,195</b>	<b>100%</b>

Table 33 - Condition of Units

Data Source: 2011-2015 ACS

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,450	9%	1,100	8%
1980-1999	780	5%	1,310	10%
1950-1979	4,850	30%	4,090	31%
Before 1950	8,990	56%	6,690	51%
<b>Total</b>	<b>16,070</b>	<b>100%</b>	<b>13,190</b>	<b>100%</b>

**Table 34 – Year Unit Built**

Data Source: 2011-2015 CHAS

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	13,840	86%	10,780	82%
Housing Units build before 1980 with children present	445	3%	265	2%

**Table 35 – Risk of Lead-Based Paint**

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

**Table 36 - Vacant Units**

Data Source: 2005-2009 CHAS

## Need for Owner and Rental Rehabilitation

The majority of Evanston’s housing stock, 86% of owner-occupied housing units and 82% of renter-occupied housing units, was constructed prior to 1980. Furthermore, 48.3% of total units were built prior to 1940, 22.2% were built between 1940 and 1959, and 15.5% were built from 1960 to 1979. Based on the age of most of the housing stock alone, there is a need for rehabilitation of both rental and ownership units.

Rental properties are inspected on a routine basis to maintain safe and sanitary housing. The City’s Code Enforcement Program is a vital tool to maintain the quality of rental housing and CDBG is used to fund activities conducted in the CDBG Target Area, which comprises primarily low and moderate income



neighborhoods. Properties with violations are cited and re-inspected to ensure corrections are made. Properties with primarily low and moderate income residents are referred to the CDBG Housing Rehab program for assistance. Owner occupied housing in the CDBG Target Area is subject to exterior inspections and cited for code violations. Properties with violations are also referred to the CDBG Housing Rehab program.

While a number of single family owner occupied houses have deteriorated and are detrimental to their neighborhood, Evanston does not have concentrations of deteriorating housing. Often low-income owners, especially seniors, cannot afford additional debt service to make improvements, address code issues, or make emergency repairs. Income eligible owner-occupied single family homes, condos and 2-flats, as well as multi-family rental buildings with income eligible tenants, are eligible for the CDBG Housing Rehab program.

The City of Evanston uses CDBG funding to administer the Housing Rehabilitation Program and has a CDBG Revolving Loan Fund to provide below market rate loans to low and moderate income homeowners and multi-family rental property owners who are unable to secure market rate financing for needed rehab. However, due to rising property taxes and other costs, there has been an increase in the number of homeowners with incomes above 80% of the area median who are unable to secure market rate financing for needed home repairs and to address code violations.

### **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

The practice of adding lead to residential paint was banned in 1978. It is reasonable to assume that a residential structure built prior to 1979 may contain lead based paint. According to the American Community Survey 2013-2017 (1), there were 13,999 owner-occupied housing units and 9,864 renter-occupied housing units built prior to 1980. In other words, there is a high probability that 83.1% of the occupied housing units in Evanston contain lead based paint.

According to the HUD Income Limits Documentation System for FY2017 (2), the Median income for the Chicago-Joliet-Naperville, IL area, which includes Evanston, is \$79,000. Using data from the American Community Survey mentioned above, 71.8% of the renter-occupied housing units and 33.3% of the owner-occupied housing have an income less than \$79,000.

### **Discussion**

The Evanston Health and Human Services (HHS) Department serves as a delegate agency for the State of Illinois lead program. The primary goal of the lead program is to protect the public's health and safety by

identifying lead-bearing substances that may be the source of exposure to children, and to assure lead hazards are managed in place, mitigated, or abated through the administration and enforcement of the Lead Poisoning Prevention Act and the Lead Poisoning Prevention Code. Evanston HHS receives all test results of blood lead levels for children residing in Evanston. A Lead Risk Assessor contacts the parent/guardian for any child with a test result of 5 µg/dL or higher and schedules a time to conduct a lead risk assessment. If lead hazards are discovered in the home of a child with an EBL, elevated blood lead level, the property owner is required to mitigate the lead using a lead abatement contractor. Evanston HHS currently receives a TORRENS grant from the Cook County Department of Public Health. This grant offers financial assistance to low income property owners. The City is committed to ongoing efforts to address lead based paint hazards and lead poisoning prevention.

In 2018, through October 1st 2019, there were 79 vacant properties and 9 properties having been brought into compliance by the buyer. There were 2 properties demolished in the past year due to multiple code violations. The majority of vacant properties are located in the City's 2nd ward with 16 and 5th ward with 26. The remaining vacant properties are located in the 8th ward with 6, 9th ward with 8, 6th ward with 3, 4th ward with 2, 3rd ward with 1, and the 7th ward with 4. Evanston continues to declare vacant properties each year, with 11 new vacant properties in the past year.

The Property Standards Program provides systematic area inspection for all non-owner occupied multi-family rental dwelling units in roughly 2,600 multi-family buildings to ensure compliance with the standard set forth in the International Code Council's 2012 International Property Maintenance Code. All multi-family rental dwelling units are inspected at least every five years. Buildings in the CDBG Target Area are inspected on a three-year schedule. Any building will be inspected as a result of a complaint. Property Standards systematically deals with owners of buildings with building code violations and acts swiftly when emergency health and safety issues arise. Property Standards has also created an educational program called RENT Evanston. RENT Evanston is a city initiative to empower and connect landlords, property owners, and property managers in Evanston. RENT stands for Rental Empowerment, Networking, and Training. In addition to quarterly newsletters, the City holds quarterly training sessions and discussions on topics relevant to property management and ownership.

## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

The Housing Authority of Cook County (HACC) serves suburban Cook County, including Evanston, and provides public housing units, project based Section 8 units and Housing Choice vouchers (Section 8).

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	2,067	12,596	58	12,538	931	335	711
# of accessible units									
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 37 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

### Describe the supply of public housing developments:

### Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

HACC owns and operates 2,026 units of housing, 244 of which are located in Evanston. The Perlman and Walchirk apartment buildings offer 100 and 99 one-bedroom units, respectively, for seniors and persons with disabilities. The public housing scattered site units operated by the HACC consist of seven two-story townhome buildings that house families in two, three, or four-bedroom units.

HUD's Real Estate Assessment Center (REAC) conducts a program of annual physical inspections of public and assisted multifamily housing. Scores range from 0-100. The physical inspection scoring is deficiency based; all properties start with 100 points. Each observed deficiency reduces the score by an amount dependent on the importance and severity of the deficiency.

The HACC's most recent REAC for the Evanston scattered site units was on 11/6/18, and resulted in a score of 62c. The HACC has 45 scattered site public housing units in Evanston consisting of 2, 3 and 4 bedroom units. The HACC has not had a REAC inspection for Perlman and Walchirk since the buildings were rehabbed in 2016.

## Public Housing Condition

Public Housing Development	Average Inspection Score

Table 38 - Public Housing Condition

### Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Following an inspection the City inspectors work with property managers to ensure that the HACC buildings are safe and code compliant.

The HACC has plans, though not yet submitted for review, for a new development at their Perlman Apartments located at 1900 Sherman Ave. The plans call for 120 apartment units in a building with underground parking and resident amenities on the first and 16th floors. The project would be designed to accommodate people in three income ranges.

- Market rate units, with monthly rents about \$2,000, would be for persons with incomes above 120 percent of area median income.
- "Missing middle" units, with monthly rents about \$1,666, would be for persons with incomes between 80 and 120 percent of area median income. They're called the "missing middle" because while many people in this income range struggle to find housing, they typically don't qualify for most government subsidy programs.
- Low-to-moderate income units, which would be for persons with incomes below 80 percent of area median. Those units would have rents about \$1,450, with nearly two-thirds of the rent coming from project-based housing vouchers.

### Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

1. Wellness Club sponsored by North Shore Senior Center (3rd Monday of each month).
2. Walgreens Pharmacy provides vaccinations (flu and shingles) as well as medical consultations.
3. Thresholds holds office hours at the property for walk ins and appointments once a week. Thresholds provides emotional/mental support and resources to tenants in need.
4. Top Box Foods delivers food orders on a monthly basis. Top Box Foods specializes in providing healthy foods at a discount. Tenants can order individual prepackaged meals, fruit and vegetables, and/or family prepackaged meals.

5. Northwestern University's Campus Kitchen delivers food to residents who are part of the program.
6. Meals on Wheels programs deliver food to residents who are part of the program.

Social Activities:

1. During the spring/summer tenants have the opportunity to become a member of the "Garden Club". The Garden Club plants fruits and vegetables and maintains the garden throughout the season. Walchirk Apartments has 4 container gardens and Perlman Apartments has 2 container gardens.
2. HACC sponsors a holiday party each year in December and a summer barbecue.
3. Field trips - HACC sponsors one field trip each year. In 2019, it was a trip to Cantigny Park in Wheaton.

Other Services:

1. The Levy Center Bus provides transportation to and from Jewel and Food 4 Less once a week.
2. During the week the Levy Center Bus provides transportation to and from the Levy Center.
3. LIHEAP (Low Income Home Energy Assistance Center) assists tenants with their energy costs.
4. Evanston Benefits Card Program enables registered residents to receive a discount at participating businesses and also the City's subsidized taxicab service.

**Discussion:**

The vast majority of Evanston's public housing inventory is one bedroom units for the elderly and persons with disabilities. Though there is a high need for public housing units in general, there is substantial unmet need for family units, as evidenced by waiting list of 1,880 households for the seven two story townhome units. Diversification of public housing units available in Evanston will assist Evanston's most vulnerable families in securing affordable housing.

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

According to Alliance to End Homelessness in Suburban Cook County there were 1,052 unduplicated Evanston residents served in 859 households in 2018. In 2017, the Alliance to End Homelessness in Suburban Cook County Continuum of Care identified 170 year-round beds dedicated to people who are homeless in Evanston, consisting of 64 emergency shelter beds, 5 transitional housing beds, and 101 permanent supportive housing beds.

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	38	0	0	83	0
Households with Only Adults	26	0	8	87	0
Chronically Homeless Households	0	0	0	59	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	8	0	0

**Table 39 - Facilities and Housing Targeted to Homeless Households**

Data Source Comments:

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

A network of public and private agencies in Evanston provide a variety of services to the homeless, ranging from prevention and outreach to comprehensive supportive services. Through referrals and cooperative service agreements, the agencies are able to meet the health, mental health, and employment needs of homeless persons along the continuum of care. Mainstream service providers include the Evanston Health Department, Erie Family Health Center, the YWCA Evanston/North Shore, McGaw YMCA, Trilogy Inc., Connections for the Homeless, Impact Behavioral Health Partners, faith-based organizations and food banks, the Housing Authority of Cook County, Levy Senior Center, the Salvation Army, and Evanston Senior Services.

To address the housing needs of homeless families with children in the school districts, the City committed HOME funds for a Tenant Based Rental Assistance (TBRA) program to be used in conjunction with an education and job training program, Learn and Earn, at Connections for the Homeless. Using HOME for Tenant Based Rental Assistance was identified as a strategy to address unmet needs in the City's 2020-2024 Consolidated Plan and 2018 and 2019 Action Plans, and recommended by the City's Housing & Homelessness Commission. In addition to providing affordable housing for Evanston households, TBRA uses existing rental housing stock and has the added benefit of providing stable tenants, particularly for small landlords and owner occupied two and three flats, which comprise a substantial part of the City's rental units with two or more bedrooms needed by families with children.

The Learn and Earn program targets Evanston households with children under the age of 18 that are homeless or unstably housed, most of whom are identified by social workers at School District 65 and/or 202. These households are unable to afford market rate rental housing because the head(s) of household lack the education and/or job skills to earn a living wage. HOME TBRA is used to establish and maintain stable housing for up to 24 months for assisted households. Connections provides wrap around services including case management, job training and education through partnerships with Oakton Community College, Inspiration Corporation, Jane Addams Resource Center, Evanston Rebuilding Warehouse, Truman and Wright Colleges, CDL Megatrucking Institute, Turkiendorf Health Training Institute and other organizations. Participants obtain part-time employment while in school/job training and full-time employment at completion of training.

Connections also connects TBRA-assisted families to a wide range of mainstream services, drawing on the broad range of social services in the Evanston community, and assists them to obtain childcare as needed throughout the program.

In addition, the General Assistance Program, which is mandated by the State of Illinois and funded by local property taxes, is administered by the City of Evanston.

The General Assistance Program provides assistance (up to \$750.00 monthly) to single adults who are not eligible for any other state or federal financial assistance programs and who do not have income or resources to provide for their basic needs. In addition to direct financial assistance, the General



Assistance program prepares and assists clients to secure employment, health care and other needs, working with Evanston social services agencies.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

Chronically homeless individuals and families: Local Evanston organizations offer a myriad of health, mental health, and employment services for homeless individuals and families who qualify and are ready to access them. While a segment of the chronically homeless population participates in the existing network of services, many are dealing with significant mental health and addiction issues, and are not receptive to programs with parameters and guidelines for participants. Connections for the Homeless has dedicated emergency shelter and transitional housing beds for the chronically homeless, and at the time of the 2018 Point in Time Count, provided 19 emergency shelter beds for individuals (specifically men) at Hilda's Place, Interfaith Action has 40 beds for homeless individuals through their emergency overnight shelter program and dedicated permanent supportive housing beds to the chronically homeless. In addition, Impact Behavioral Health provided 36 dedicated permanent supportive housing beds to the chronically homeless.

Families with Children: Evanston contains 46 emergency shelter beds for homeless families with children through the YWCA Evanston/North Shore, 32 beds, and at Family Promise North Shore's PADS style family shelter, 14 beds. The YWCA's family shelter is targeted toward victims of domestic violence and their children. Domestic violence programs typically do not house clients from the community in which they are located, but refer them to facilities in other communities to provide separation from their abusers. This makes it difficult to estimate the need for additional DV beds in Evanston. Permanent supportive housing is provided by Connections for the Homeless through 54 units, 20 of which are dedicated to households with children. Housing Opportunity Development Corporation, Impact Behavioral Health Partners, and YWCA Evanston/North Shore also offer permanent supportive housing units.

Veterans and their Families/unaccompanied youth: Veterans and their families are able to receive services from the Evanston Veterans Center and the James A. Lovell Federal Health Care Center. Both are operated by the U.S. Department of Veterans Affairs. Some services provided include primary care, mental health, counseling, and senior care. Evanston does not have emergency shelters for runaway or locked out teens, however Youth & Opportunity United and The Harbour provide housing in nearby suburbs for unsheltered teens and transport them to school and other services.

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

Special needs groups include the elderly and frail elderly, persons with severe mental illness, persons with physical and/or developmental disabilities, persons with alcohol or other drug addiction, and persons living with HIV/AIDS. There is one or more organizations in Evanston that address the needs of these special needs populations. However, due to the growing number of persons with special needs, gaps in capacity remain for housing and supportive services.

### **Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

The City of Evanston anticipates undertaking some housing activities to benefit special needs populations, including home rehabilitation to provide access ramps, lifts, accessible bathrooms, etc., for persons with physical disabilities through the CDBG Housing Rehab program. The City will continue to monitor the implementation of the Williams Consent Decree which will move some residents of Institutes of Mental Disease (IMDs) into community based housing. Evanston has two IMDs with a total of 562 beds.

Evanston's population is aging rapidly, which increases the need for senior housing and services. The City's Assistant Director of Community Services is currently working with Northwestern University to assess the age-friendliness of the community, including the availability of housing options for seniors at all income levels, using standards developed by the World Health Organization. City staff is exploring housing options to enable seniors to "age in the community" as part of this evaluation. Additionally, the City's Handyman program provides small scale repairs to low income seniors to help maintain their homes.

The elderly, including the frail elderly, need access to facilities and support services to ensure safe, decent, affordable housing. Many seniors are on fixed incomes and cannot afford to retrofit housing as their need for better accessibility increases. Likewise, when the elderly are no longer able to care for themselves the need for in-home care or residential facilities becomes crucial. Over the next several years the vanguard of the "Baby Boomers" will hit retirement age and their incomes will level since they will be past the peak earning years as a generation. Health care and supportive services will gradually become a larger concern as they get older, which will impact the system in a more dramatic fashion since they are the largest cohort to reach retirement age in US history.

As with the elderly, persons with mental, physical, and developmental disabilities also need access to facilities or programs that ensure safe, decent, affordable housing. Because children and young adults are represented in this population, the impacts of this group are different from the elderly. The length of time that they need supportive housing is generally much longer. Additionally, those with drug or alcohol addictions, persons with HIV/AIDS and their families need greater access to supportive housing. The City and its partner organizations work in tandem to either provide services or refer these groups to the proper supportive organizations.

### **Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

Agencies that provide supportive housing for persons with physical and mental disabilities in Evanston include Over the Rainbow, Center for Independent Futures, Impact Behavioral Health Partners, Connections for the Homeless, Rimland NFP and Shore Community Services. These agencies may include individuals returning from mental and physical health institutions and persons with disabilities who are homeless among their clients, but their housing is not exclusively for these subgroups. There is a lack of coordination between institutions releasing patients and community based agencies and this disconnect can negatively impact both patients and communities to which they return. The City will continue to work with the Alliance to End Homelessness in Suburban Cook County, local hospitals and other institutions to improve access to available permanent supportive housing beds in the Cook County Continuum.

The City of Evanston Health Department is designing a new program, Safe and Healthy Homes, to identify housing rehab or retrofit needs for persons being released from the hospital or rehab facilities but who do not require permanent supportive housing to enable them to live safely in their homes.

### **Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

As stated previously, the City of Evanston will undertake some housing activities to benefit special needs populations in 2020, including home rehabilitation to provide access ramps, lifts, accessible bathrooms, etc., for persons with mobility impairments through the CDBG Housing Rehab program. The City will continue to monitor the progress of the Williams Consent Decree which will move some residents of the IMDs into community-based housing and require affordable and accessible housing units. These activities are linked to the one year goals of affordable housing, creating livable communities, and public services.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

In 2013, the City of Evanston joined the World Health Organization (WHO)'s "Age Friendly Cities" project to provide a system to educate, encourage, promote and recognize improvements that will make Evanston more user-friendly for residents of all ages. A nine-member "Age Friendly Evanston!" task force was charged with developing an Age Friendly Initiative and formulating a three-year citywide action plan for implementation. In September 2014, Mayor Tisdahl signed the Milken Institute's "Best Cities for Successful Aging Mayor's Pledge, joining mayors from across the country to take steps to make cities work better for older adults, such as providing access to resources promoting health and wellness, and ensuring that the well-being of the aging population is addressed by each City department and division. Mayors who sign the pledge also commit to providing opportunities for older adults to work for their cities, including promoting the engagement of older residents in volunteer and paid roles that serve the City's needs.

In 2016, the Age Friendly Evanston Task Force published its Age Friendly Evanston Action Plan, "Toward Building a Livable Community for All Ages." The action plan included the following recommendations for age-friendly housing in Evanston:

- Expand affordable housing through community land trust
- Expand shared housing opportunities
- Expand opportunities for subsidized assisted living
- Explore innovative approaches to expand affordable housing options

In 2018, the City's Housing and Homelessness Commission and City Council approved funding to the Age Friendly Evanston Task Force to hire an outside consultant to undertake a senior affordable housing feasibility study. The findings from the study were presented to the Housing and Homelessness Commission in November 2019, and will be taken into consideration as the City develops its affordable housing plan.

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

The City is partnering in the regional Assessment of Fair Housing (AFH) for which Cook County is the lead agency and Enterprise will provide staffing and technical assistance. The City expects to have data and most of the conclusions of this AFH to inform the development of its 2020-2024 Consolidated Plan. If the AFH is not completed prior to the submission of the City's new ConPlan, the City will review the final AFH when completed and amend its ConPlan as needed.

The primary barrier to affordable housing is the growing mismatch between incomes and housing costs in Evanston. The City's inflation-adjusted median household income rose 1% between 2009 and 2015, from \$69,544 to \$70,041. However, between 2004 and 2013, Evanston lost over 40% of its rental units affordable to households earning at or below 80% of area median income due to the rise in construction of high-cost rental developments. In addition, rents rose 16% from 2009 to 2015, far out-pacing the 1% increase in median income during the same time period. Minimum-wage, single income households and those depending on SSI payments cannot afford an apartment renting at the fair market rate in Cook County, and property taxes continue to represent an affordability concern for residents, particularly those with fixed incomes.

High property costs, particularly in predominantly single family neighborhoods with larger lot sizes and transit oriented corridors, has resulted in the concentration of affordable housing in west and south Evanston neighborhoods rather than being dispersed evenly. The stigma associated with affordable housing can be a barrier to siting affordable housing in areas of the City where currently none exist.

Another barrier to affordable housing within Evanston is the shortage of decent, affordable and accessible housing for persons with disabilities. The limited supply of affordable housing accessible to persons with physical disabilities is due in large part to the age of housing stock, most of which was built before the Americans with Disabilities Act was passed. Many of the City's older homes are difficult to retrofit for accessibility because they are multi-story units with stairs. This is true of smaller two-to-four flats as well as larger three or four-story walk-ups built in the 1930s and 1940s. Some facilities designed to accommodate people with mobility disabilities exist in Evanston, including the Hill Arboretum Apartments and two senior/disabled buildings that the HACC updated per its Section 504 Transition Plan. However, stakeholders and HACC waiting list data suggest that the unmet need for affordable accessible housing will continue to be significant.

The City's occupancy standards for rental housing that limits the number of unrelated persons residing in a single housing unit can be an additional barrier to affordable housing, particularly for non-traditional households. The City is evaluating an amendment to the ordinance; considerations include adopting a more open and inclusive definition of family or household, and basing occupancy on square footage and the configuration of the housing unit, which could expand the availability of affordable housing options and help maintain Evanston's socio-economic diversity.



## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

The City of Evanston is a regional center for health care, education, and business in the Chicago metropolitan area and is also home to the prestigious Northwestern University. Major employers include Northwestern University, North Shore University Health System, St Francis Hospital, the City of Evanston, Evanston-Skokie Community Consolidated School District 65, Evanston Township High School District 202, Presbyterian Homes, Rotary International, Mather Lifeways, and C.E. Niehoff & Co. While economic conditions in the area are fairly stable, like the rest of the State and country, Evanston experienced the impact of the recession. Unemployment is down substantially since peaking at 7.9% in 2010, to 2.7% as of September 2019, which is lower than the State of Illinois rate of 3.9% (Bureau of Labor Statistics, Local Area Unemployment Statistics, 11/13/2019). However, examining the unemployment rate by race and ethnicity highlights major disparities. The unemployment rate for White Evanston residents was 3.8%, while the unemployment rate for African Americans was 10.3% and 5.0% for Hispanics, based on US Census ACS 2017 5-year survey, Table S2301.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	22	10	0	0	0
Arts, Entertainment, Accommodations	3,731	6,068	13	14	1
Construction	570	391	2	1	-1
Education and Health Care Services	8,851	24,490	30	57	27
Finance, Insurance, and Real Estate	2,795	1,276	9	3	-6
Information	898	1,323	3	3	0
Manufacturing	1,874	526	6	1	-5
Other Services	1,403	1,604	5	4	-1
Professional, Scientific, Management Services	4,340	2,764	15	6	-9

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Public Administration	0	1	0	0	0
Retail Trade	2,913	3,579	10	8	-2
Transportation and Warehousing	788	198	3	0	-3
Wholesale Trade	1,405	525	5	1	-4
Total	29,590	42,755	--	--	--

**Table 40 - Business Activity**

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)



## Labor Force

Total Population in the Civilian Labor Force	39,680
Civilian Employed Population 16 years and over	36,785
Unemployment Rate	7.32
Unemployment Rate for Ages 16-24	14.89
Unemployment Rate for Ages 25-65	4.88

**Table 41 - Labor Force**

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	14,985
Farming, fisheries and forestry occupations	1,050
Service	2,460
Sales and office	7,170
Construction, extraction, maintenance and repair	810
Production, transportation and material moving	715

**Table 42 – Occupations by Sector**

Data Source: 2011-2015 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	17,205	52%
30-59 Minutes	11,245	34%
60 or More Minutes	4,465	14%
<b>Total</b>	<b>32,915</b>	<b>100%</b>

**Table 43 - Travel Time**

Data Source: 2011-2015 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,125	120	750
High school graduate (includes equivalency)	2,630	235	1,290
Some college or Associate's degree	4,415	425	1,260

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	21,125	1,095	4,165

**Table 44 - Educational Attainment by Employment Status**

Data Source: 2011-2015 ACS

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	10	130	425	550	475
9th to 12th grade, no diploma	545	190	185	520	425
High school graduate, GED, or alternative	2,710	895	1,220	2,040	1,425
Some college, no degree	6,730	1,160	1,070	2,485	1,385
Associate's degree	290	375	415	595	265
Bachelor's degree	1,770	4,030	2,735	5,005	2,205
Graduate or professional degree	235	3,500	4,165	6,955	3,415

**Table 45 - Educational Attainment by Age**

Data Source: 2011-2015 ACS

### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	20,607
High school graduate (includes equivalency)	30,979
Some college or Associate's degree	31,816
Bachelor's degree	50,856
Graduate or professional degree	73,359

**Table 46 – Median Earnings in the Past 12 Months**

Data Source: 2011-2015 ACS

### Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Evanston has a well-developed economic base that provides employment opportunities for citizens of Evanston as well as residents of the Chicago metropolitan region. The largest employment sectors in Evanston are Education and Health Services (8,851 workers), Professional, Scientific, Management Services (4,340 workers), Arts, Entertainment, Accommodations (3,731 workers), Retail Trade (2,913 workers), and Finance, Insurance, and Real Estate (2,795 workers).

### **Describe the workforce and infrastructure needs of the business community:**

The City of Evanston conducted a Community Needs Assessment Survey and an Economic Needs Survey in the summer of 2019. Participants identified community needs across several areas including Economic Development. The following needs were identified by the business community: loans or grants to help businesses open or expand in Evanston; infrastructure improvements to help retain businesses, and business consulting for small businesses or start ups. 35 businesses responded across a variety of sectors including Professional Services, Real Estate, Healthcare and Arts, Entertainment & Recreation; 58% were home-based, 17% were office based and 15% had a physical storefront. Based on the small number of responses, the Economic Development Department may conduct further inquiry into the needs of small businesses in coming years.

### **Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

In 2015-2019, significant progress was made to address retail/commercial vacancies in west Evanston, particularly in its Neighborhood Revitalization Strategy Area and in the Howard Street commercial corridor in south Evanston. This included the purchase of the Evanston Plaza Shopping Center by Valli Produce, which a new grocery store that opened there in 2015 as its anchor store, and new tenants including a Goodwill store and Dance Center Evanston, have resulted in the revitalization of the Dempster-Dodge commercial corridor. Other improvements include a Starbucks that opened in the shuttered Kentucky Fried Chicken store across the street, and Erie Family Health Center, a federally-qualified health center, one block west of Evanston Plaza on Hartrey Avenue. This created significant new job opportunities for residents of the surrounding neighborhoods and brought needed goods and services that draw customers and clients from all parts of Evanston and surrounding communities. In addition, Youth Opportunity United, one of the largest youth serving organizations in Evanston, opened its new headquarters at 1911-17 Church Street across the street from Evanston Township High School. YOU provides educational and social services supports to children in K-12th grades, as well as job readiness training and workforce development to connect young people with Evanston businesses in the West End Business District southwest of the Dempster & Dodge intersection, that offer opportunities in skilled manufacturing and other careers.

The City continued its work to revitalize and redevelop the Howard Street commercial corridor. Theo Ubique, a cabaret-style theatre, moved from Chicago's Edgewater neighborhood to its new facility on Howard Street, and Good To Go Jamaican Restaurant relocated and expanded on the Evanston side of Howard Street after purchasing and renovating two properties that had been vacant for many years. IN 2019, CJE/Evergreen Development received an allocation of LIHTC for a 60-unit senior housing project on Howard Street that will provide much-needed affordable housing to that corridor and further

revitalize that corridor. The Economic Development division will continue to work to bring new businesses to fill retail and commercial space, with particular focus on the Church-Dodge and Simpson Street neighborhood business districts, which continue to experience less investment than other parts of the City, and the Howard Street business corridor.

CTA transit improvements will expand the accessibility and connectedness of Evanston's commercial corridors. The CTA Red/Purple Line Modernization project will update and increase accessibility of the CTA's Purple Line stations in Evanston. The modernization will increase capacity and improve Evanston residents' ability to travel throughout the Chicago region. In addition, the City is working with the CTA and Pace to improve bus service, both within Evanston and inter-suburban routes, including the Dempster Street line, that provide access to employment and businesses in communities to the west and northwest.

### **How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

Evanston is home to a generally well-educated and skilled workforce. Approximately 56.2% Evanston residents have a bachelor's degree or higher and 94.2% are high school graduates or higher. As shown previously, the majority of workers in Evanston are employed in white-collar positions such as professional services, health care, business, management, financial operations and sales. As the home of Northwestern University, Evanston has a long history of developing highly educated professionals and is also a magnet for creative, educated, and talented people. However, the high level of jobs requiring advanced levels of education and the lack of unskilled jobs creates a bleak job market for those that are uneducated. The exodus of manufacturing jobs and other unskilled labor has cultivated an uneven environment where those of means have the opportunity to succeed and those without are continuously part of a cycle of poverty.

### **Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

There are multiple workforce training initiatives in Evanston that serve different populations. The Mayor's Summer Youth Employment Program provides summer jobs primarily for low income youth at the City, nonprofits and area businesses for youth 14-18. The program doubled to serve over 1,000 teens in 2018.

The City's Certificate of Rehabilitation program focuses on unemployed and under employed adults with criminal records. Clients that complete this program successfully receive Certificates of Rehabilitation under Illinois Senate Bill 1050, which seals or expunges their criminal records and opens doors to employment opportunities. In addition to legal services, the program provides a career path

development program for 18-25 year olds without post high school education plans or employment. The latter group will receive a broad range of educational and support services and on the job training with participating employers.

The Youth Job Center also provides job readiness training, placement and follow up supports to low-income youth between the ages of 14-25 with barriers to employment. YJC develops partnership with area businesses to develop internship positions funded by the Workforce Investment Act.

Impact Behavioral Health Partners (formerly Housing Options for the Mentally Ill) provides a job readiness and placement program for persons with mental illnesses, including individuals who are not in their permanent supportive housing programs. Program staff place clients in jobs that are compatible with their interests and abilities and provide supportive services to both the employee and employer.

Interfaith Action of Evanston provides a Job Counseling program that assists clients of Connections for the Homeless' Entry Point and Hilda's Place find employment. The program also provides its clients with clothing for interviews and transportation to job interviews.

Northwestern University and the City of Evanston partnered to create the Workforce Development Program to help provide employment and apprenticeship opportunities for Evanston residents through construction and renovation projects on campus.

The Illinois WorkNet that serves Evanston does not have an office here, but provides services at the City's Main Library in addition to at its facilities in Arlington Heights.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

No

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

The City of Evanston's Economic Development Division develops strategies to attract and retain businesses and expand employment opportunities in Evanston. ED staff works closely with Cook County and the Chicago Metropolitan Agency for Planning (CMAP) to align with regional planning efforts, including CMAP's On to 2050 plan.

The economic development initiatives the City is undertaking which may be coordinated with the Consolidated Plan include an assessment of the West Evanston Plan (2007) and its zoning overlay that

govern development in census tract 8092, which includes the Church-Dodge and Simpson Street neighborhood business districts. Those plans were completed before the collapse of the housing market in 2008 and the subsequent recession and need to be re-evaluated based on the current development climate. The City is evaluating the merits of including this within the framework of a new Comprehensive or Strategic Plan that would address broad community issues such as single-family zoning that perpetuates patterns of racial/ethnic segregation within our community, and sustainability goals of the City's Climate Action and Resiliency Plan (CARP) that was approved by City Council in 2019.

## **Discussion**

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

The definition of concentration of households with multiple housing problems used by the City of Evanston is based on Code Enforcement records that show housing units in a defined geographic area, generally a census tract or block group, have a 10% or greater instance of 15 or more code violations per unit than the city wide percentage. This analysis is used to define the CDBG Target Area in which CDBG funds are used to provide more intensive code inspections and for graffiti removal to address HUD statutory goals of providing decent housing and a suitable living environment for low- and moderate-income residents.

The racial or ethnic group that experiences multiple housing problems at 10 percentage points or higher in are Hispanics. Examining their concentration within the City highlights the concentration of multiple housing problems. The 8097 census tract has the highest concentration of Hispanics and the highest concentration of multiple housing problems.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

Per the draft Existing Conditions of the Cook County-wide Assessment of Fair Housing currently under development, Evanston is a majority White, non-Hispanic community with smaller but still significant populations of Black/African American, Asian/Pacific Islander and Hispanic residents. Evanston's population of 74,000 is 61% White, non-Hispanic, 19% Black/African American, non Hispanic, 10% Asian/Pacific Islander, non-Hispanic and 9% Hispanic. Compared to Cook County as a whole, Evanston has higher rates of White, non-Hispanic and Asian/Pacific Islander residents and lower rates of Hispanic and Black, non-Hispanic residents. Since 1990 Evanston decreases in its White, non-Hispanic population of about 5,000 residents and its Black/African American population decreased by 2,000 residents, while the Asian/Pacific Islander and Hispanic populations more than doubled from 5% and 4% of the population respectively in 1990 to 10% and 9% in 2010.

Geographically, there are three neighborhoods (census tracts) in Evanston where a race other than White, non-Hispanic is the predominant one – two neighborhoods on the west side of jurisdiction and one on the south side are predominantly Black/African American. All other Evanston neighborhoods are predominantly White, non-Hispanic, although they have become less predominantly White, non-Hispanic over time as the population become more diverse. This pattern and trend is generally consistent with that of other areas of northern Cook County

The definition of concentration used in this analysis is a neighborhood/census tract where any racial/ethnic minority occurs in a greater percentage than in the City as a whole. According to HUD's segregation framework based on dissimilarity indices, Evanston has persistently high Black/White segregation levels since 1990. Segregation levels across the Non-White/White and Hispanic/White pairings were moderate in 1990 but decreased over time to low levels as of the 2013-2017 ACS. Asian or Pacific Islander/White segregation levels have been consistently low since 1990.

Evanston has no Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

### **What are the characteristics of the market in these areas/neighborhoods?**

Generally speaking, there is a lack of variety in commercial areas with a larger number of convenience stores, service based businesses (Barbershops, doctor's offices, etc.) and fast food located within the areas of concentrated housing problems and racial/ethnic concentration. Within these areas smaller rental buildings and homes (2-flats or single family homes vs. large apartment complexes) are more common when compared to denser and more affluent areas of Evanston. The housing stock is typically older and in need of rehabilitation and repairs.

### **Are there any community assets in these areas/neighborhoods?**

Evanston Township High School is located between Church St, Dodge Ave, Lake Street and Pitner Ave and is a community asset not only for West Evanston but for the entire city. Several parks exist in the area, including Mason Park, Perry Park, Penny Park, Foster Park, Twiggs Park and Gilbert Park. The parks serve as community gathering places and provide opportunities for recreation. From a cultural perspective, many residents can trace their families going back several generations in the same general area which has helped to maintain a strong sense of community.

### **Are there other strategic opportunities in any of these areas?**

The intersection of Church & Dodge has grown to become a commercial node that serves the community surrounding it, including students and staff at Evanston Township High School. YOU., a nonprofit organization serving youth, is headquartered at this location and provides out of school programming and support to high school students. The area also includes the Gibbs-Morrison Center, which the City acquired out of foreclosure, and several local businesses that benefit the community. The City acquired the vacant parcel at the corner of Church Street and Darrow Avenue, one block east of the Church-Dodge intersection, in 2019. Plans are underway for the redevelopment of that parcel and two



adjacent parcels on Darrow Avenue. A neighborhood meeting to explore what residents of the neighborhood envision for this development was held in September 2019 to start this process.

Evanston Plaza/Dempster & Dodge has flourished with Valli Foods as a retail anchor. The James B. Moran Center for Youth Advocacy moved its headquarters to this location and continues to serve youth and their families. Multiple businesses that cater to both local residents and those traveling through have also come to this corridor including GoodWill and a Dollar Store; these retailers have created jobs for residents and revitalized the area.

Additionally, the areas most impacted by disinvestment and housing problems are generally within the new Neighborhood Revitalization Strategy Area, comprising census tracts 8092 and 8093, as well as census block group 8096.02. This area closely mirrors the redlined area of Evanston and will be an area of focus for CDBG and other investment in the 2020-2024 Consolidated Plan period.

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

### **Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

Evanston residents face disparities – often along geographic, racial, gender, and economic lines – in their access to at-home broadband, digital skills trainings and workforce opportunities within the technology sector. RCN provides high speed internet access to 95% of Evanston, but data on the number of residents who are not able to afford services is not clear. In recent years, Evanston has made significant progress in providing free digital access and literacy to ensure that all residents have the skillset needed to participate in the economy of the future. To date, the City offers free Wi-Fi at facilities including its libraries, senior and community service centers and distributes a free Hotspots map identifying all locations in Evanston that provide free Wi-Fi services; this map is distributed in partnership with the local schools. Additionally, agencies supported with CDBG and local awards for public services offer STEAM learning, digital skills training, and workforce development opportunities to low/moderate income youth. Family Focus, YOU, the McGaw YMCA and the Youth Job Center have computer labs for program participants, free internet access, and support for online learning.

All Evanston Public Library cardholders age 16 or older can participate in the Wi-Fi Hotspot lending program. This program provides free internet service for up to 4 weeks at a time. Wi-Fi hotspots were circulated over 1,000 times in 2018 to over 400 residents. The library started the program with 15 available hotspots and has expanded to 50. The library also offers Tech Training Classes in English and Spanish to individuals and groups.

The 1:1 Digital Learning Initiative, introduced by Evanston Township High School, provides Chromebooks for students to use during and after school hours. Chromebooks are distributed to all students; technical support, loaner devices, repairs and charging services are also provided. The school also offers Wi-Fi Hotspots (up to 50) which can be checked out to students 13 and older. These hotspots, which can be checked out for a full quarter, are provided by T-Mobile and include a filter that is Children’s Internet Protection Act (CIPA) compliant.

### **Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

The City currently has multiple broadband providers including Comcast, AT&T, Xfinity and RCN. RCN installers reach 95% of the City. Residents face challenges to affording services, not access. Attempts to provide access to free services have been detailed in the previous response.



## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

The primary local climate hazards associated with climate change include: extreme heat, shorter winters, increasingly intense storms, drought, threats to water quality and the relative instability of energy prices. Impacts from these hazards include: infrastructure stress, human migration, flooding, invasive species/pests, air pollution and the continued deterioration of housing stock – especially affordable housing.

The City is also working in partnership with the Center for Neighborhood Technology to evaluate the degree to which housing affordability is threatened by climate change and displacement. This study is made possible by a \$125,000 grant from Partners for Places with 100% match support to increase affordable, climate resilient housing. The program will focus on low/moderate income, vulnerable residents to transition existing affordable housing to climate-resilient, energy-efficient standards and is in the early stages of planning and development.

The City has developed the following working definition for vulnerable populations relative to climate change hazards: lower income residents, people of color, immigrants and refugees, the elderly, children, people with disabilities, renters, and those without access to cars. Many climate hazards result in negative effects that can include: higher utility bills, increased probability of flooding, higher food costs, and other financial stresses. Vulnerable populations, community members who are placed at a disadvantage in preparing for and/or responding to climate hazards, are at a disadvantage when responding to and preparing for these effects. The City recognizes that addressing their needs is a matter of environmental and climate justice and takes a proactive approach to protecting the community's vulnerable residents.

Housing under review was defined accordingly: single family detached housing, two flat properties, 3-9 unit buildings, and 10+ unit buildings. Climate vulnerability indicators include: percent of tree canopy land cover, average surface temperature, average ozone level, average atmospheric particulate matter, likelihood of flooding, and percent of impermeable land cover. Evanston's housing stock consists primarily of units built before 1940 and single-family detached and 5+ unit buildings.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

The local impacts of climate change in Evanston were identified through the City's participation in the Urban Sustainability Directors Network (USDN) Socioeconomic Climate Mapping Tool Project. The resulting Climate and Socio-economic Vulnerability Assessment helped City staff understand local climate data.



# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The Strategic Plan presents the priority needs and goals determined through consultation with the public, City departments, and service providers. The community's priority needs in housing, public improvements, public services, and economic development are highlighted describing where and how the City of Evanston will geographically distribute its federal grant funding.

The City of Evanston's homelessness and anti-poverty strategies are presented along with the Housing Authority of Cook County's provision of public housing. Findings from the Regional Fair Housing Assessment will once again be used to identify barriers to affordable housing in Evanston along with the report's recommendations to remove these barriers. Additionally, the Strategic Plan addresses the City's strategy for eliminating lead-based paint hazards in housing.

The anticipated resources and allocation of funding demonstrates the City's strategic approach to accomplishing its goals. The goals are based on the highest community priority needs.

The City is assessing whether to apply for a Section 108 Loan to further economic development opportunities and support housing rehab and development to benefit low- and moderate income residents in the CDBG Target Area and throughout Evanston.

## SP-10 Geographic Priorities – 91.215 (a)(1)

### Geographic Area

Table 47 - Geographic Priority Areas

1	<b>Area Name:</b>	Entire Jurisdiction
	<b>Area Type:</b>	Entire area covered by the City of Evanston
	<b>Other Target Area Description:</b>	Entire area covered by the City of Evanston
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Evanston's entire geographic area. See attached map.
	<b>Include specific housing and commercial characteristics of this target area.</b>	NA
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	NA
	<b>Identify the needs in this target area.</b>	NA
	<b>What are the opportunities for improvement in this target area?</b>	NA
	<b>Are there barriers to improvement in this target area?</b>	NA
2	<b>Area Name:</b>	CDBG TARGET AREA
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	

<p><b>Identify the neighborhood boundaries for this target area.</b></p>	<p>The CDBG Target Area is most of central and south Evanston from Green Bay Road and the Metropolitan Water Reclamation District canal to Howard Street, and east of the canal between Howard and Oakton Streets to the Metra tracks. It comprises the following census tracts and block groups: 8092; 8093, 8095; 8096.02 and 8096.03; 8097.02 and 8097.03; 8101.01, 8101.02, 8101.03, and 8101.05; 8102.01, 8102.02, 8102.03, and 8102.04; 8103.12, 8103.13, and 8103.14; 8103.21 and 8103.22. There are a total of 27 block groups in the CDBG Target Area. See attached map.</p>
<p><b>Include specific housing and commercial characteristics of this target area.</b></p>	<p>The CDBG Target Area has a mix of single-family and multifamily properties, as well as a variety of different commercial spaces. The portion east of Ridge Avenue has a large multifamily housing stock, whereas west of Ridge Avenue is primarily smaller single-family homes. As with most of Evanston, the housing stock is aged and deteriorating (in varying capacities), most of which is not accessible for those with mobility issues. The commercial areas have a higher than average amount of vacancy. The vacant commercial spaces are deteriorating and require significant rehabilitation in order to be viable businesses space. There are areas of unimproved public infrastructure (ie: alleys) and areas of deteriorating infrastructure, such as sidewalks and roads.</p>
<p><b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b></p>	<p>When consulting with business and economic development organizations and individuals, the Howard Street and Dodge Avenue commercial corridors were identified as areas of opportunity specifically regarding deteriorating buildings and vacant spaces.</p> <p>The Health and Community Development Department staff members noted the proposed area experienced more frequent occurrences of graffiti and code enforcement issues, particularly with rental housing.</p> <p>Social service providers noted this area having persons experiencing a higher need for services, particularly related to youth and young adult education and job training opportunities. Many areas within the CDBG Target Area experience higher than average rates of unemployment and underemployment.</p>



<p><b>Identify the needs in this target area.</b></p>	<p>The needs, as described above, center around economic development/business attraction, improving public infrastructure (specifically alleys, roads, lighting and parks), improvement of existing housing stock, increased access to social services, and preservation of neighborhoods through code enforcement and graffiti removal actions.</p>
<p><b>What are the opportunities for improvement in this target area?</b></p>	<p>The opportunities for this area are to create safe &amp; healthy neighborhoods, making the designated Target Area an area of choice. This would include better land use and reconnection of street grids, providing necessary goods and services for area residents, reduced crime, increased employment and economic opportunities and improved infrastructure and housing.</p>
<p><b>Are there barriers to improvement in this target area?</b></p>	<p>The number one barrier to improvement is the lack of resources, both of the city and community partners as well as the residents. The City and partner agencies simply do not have enough funding to make all of the necessary infrastructure and housing improvements while providing necessary services to the residents of the area.</p> <p>Additionally, the issue of disengaged landlords exists, creating additional barriers to quality, affordable housing. From a social perspective, a lack of job skills particularly of youth and young adults in the area create difficulties for residents to hold living-wage jobs. Aged commercial buildings, which require significant resources to rehabilitate them, create a larger challenge when trying to attract new business to the area.</p>

**General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

All activities funded will primarily benefit low- and moderate- income persons or households, either as direct service or financial assistance or by making improvements in areas benefiting primarily low- and moderate- income persons. Some activities, for reasons of qualification and/or desired beneficiaries, will

be focused geographically. Some examples of how the City anticipates geographically focused investments are:

**Public Infrastructure Improvements:** By their nature, they must be in low- and moderate- income Census Tract Block Groups, which are primarily located in the CDBG Target Area, with some exceptions. Most of the eligible block groups within the City are located on the South and West areas of the City. It is anticipated that funded public infrastructure improvements, including but not limited to alley paving and park improvements, will be primarily focused in the CDBG Target Area.

**Economic Development:** The areas that have high vacancy and/or unemployment are the Howard Street, Church and Dodge, and Simpson Street commercial corridors. Economic development activities will be focused in these areas, particularly direct financial assistance for the purpose of job creation or to bring needed goods and services to low/moderate income neighborhoods. These areas are located in the CDBG Target Area.

**Code Enforcement:** Although Code Enforcement inspectors perform inspections citywide, the CDBG-funded portion of code enforcement will be within the CDBG Target area, which will be paired with other community development activities in the area to address areas of deterioration, maintaining code enforcement and property standards of dwelling units in the area.

Other programs or projects may take place within the CDBG Target area, but they will not be exclusively so. An example of this is the CDBG Housing Rehab Program, which can be undertaken anywhere in the City if benefitting eligible low- and moderate- income households, but will likely take place primarily in the CDBG Target Area because it has the majority of Evanston's low- and moderate- income households.

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 48 – Priority Needs Summary

1	<b>Priority Need Name</b>	Access to Rental Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Affordable Housing Homelessness
	<b>Description</b>	A high need for increased affordable rental housing and access to affordable rental housing was identified through the consultation and citizen participation process. Evanston's low and moderate income community, including the homeless and special needs population, has difficulty securing affordable rental housing.
	<b>Basis for Relative Priority</b>	Input received from the community and citizen participation phase necessitated a high priority.
2	<b>Priority Need Name</b>	Maintain and Improve Rental Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly

	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Affordable Housing
	<b>Description</b>	A high priority need exists to maintain and improve Evanston's existing rental housing supply. The old age of Evanston's rental housing requires the City to take action in order to ensure a positive quality of life for low and moderate income renters throughout the City.
	<b>Basis for Relative Priority</b>	Input received from the community and citizen participation phase necessitated a high priority.
<b>3</b>	<b>Priority Need Name</b>	Maintain and Improve Owner Occupied Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Affordable Housing
	<b>Description</b>	A high priority need exists to maintain and improve Evanston's existing homeowner housing supply. The old age of Evanston's homeowner housing requires the City to take action in order to ensure a positive quality of life for low and moderate income homeowners throughout the community.
	<b>Basis for Relative Priority</b>	Input received from the community and citizen participation phase necessitated a high priority.
<b>4</b>	<b>Priority Need Name</b>	Economic Development
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Economic Development
	<b>Description</b>	A high priority need for improving and maintaining commercial activity and economic viability within the low and moderate income areas of the City was identified through consultation and community input. A need exists for workforce development and job training in order to provide economic opportunities for low and moderate income residents.
	<b>Basis for Relative Priority</b>	Input received from the community and citizen participation phase necessitated a high priority.
5	<b>Priority Need Name</b>	Public Infrastructure
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Geographic Areas Affected</b>	CDBG TARGET AREA
	<b>Associated Goals</b>	Creating Livable Communities
	<b>Description</b>	A high priority need exists to improve and maintain the existing public infrastructure and public facilities. Street resurfacing, sidewalk repair, street lighting, and other public infrastructure improvements were identified through community input and consultation as a high priority need.
	<b>Basis for Relative Priority</b>	Input received from the community and citizen participation phase necessitated a high priority.

<b>6</b>	<b>Priority Need Name</b>	Public Facilities
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Creating Livable Communities
<b>Description</b>	There exists a high need to improve and maintain public facilities. Improvements to public parks, community centers, and other public facilities are needed to maintain and improve the low and moderate income community areas of Evanston.	

	<b>Basis for Relative Priority</b>	Input received from the community and citizen participation phase necessitated a high priority.
7	<b>Priority Need Name</b>	Public Services
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Individuals Mentally Ill Chronic Substance Abuse Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Homelessness Public Services
	<b>Description</b>	A high priority need for public services improvements and accessibility to public services was identified through consultation and community input. There exists a gap in the services available within Evanston to effectively and comprehensively address the needs of the community.
	<b>Basis for Relative Priority</b>	Input received from the community and citizen participation phase necessitated a high priority.
8	<b>Priority Need Name</b>	Homeownership
	<b>Priority Level</b>	Low

<b>Population</b>	Low Moderate Middle Large Families Families with Children Elderly
<b>Geographic Areas Affected</b>	
<b>Associated Goals</b>	Affordable Housing
<b>Description</b>	There is a need for assistance to acquire, rehab, or construct new homeownership units for moderate income residents due to the high cost of housing in Evanston.
<b>Basis for Relative Priority</b>	The need for homeownership assistance exists due to high housing costs.

**Narrative (Optional)**

The priority needs presented above represent the greatest challenges faced by the City of Evanston. Through consultation and community input the City was able to determine the priority needs of the community and how best to address those needs.

The high cost of housing in the City of Evanston creates the need for affordable rental housing for the community's low and moderate income residents. As seen in the needs assessment, housing cost burden impacts renters and homeowners alike. Utilizing CDBG and HOME funds will allow the City to maintain and improve existing rental and homeowner housing in order to maintain the affordability of living in Evanston. Increasing the access to and the availability of the rental housing supply will also enable homeless or those at-risk of homelessness the opportunity to have safe, decent, sanitary, and affordable housing. In addition, homeownership assistance is needed for low and moderate income residents however such assistance will come from local funding sources.

Additionally, greater economic opportunities are needed throughout the low and moderate income areas of the City. Workforce development and job training, as well as support for business start-ups and microenterprises will best serve those members of the community who do not have the resources or opportunity to fulfill their potential. Assistance to existing or new businesses will allow for increased job opportunities within the low and moderate income areas of Evanston and improve the overall economic climate of the City.



Finally, the need is high for improvements to public infrastructure, facilities, and services. Maintaining and improving the quality of low and moderate income community areas through street resurfacing, alley paving, sidewalk improvements, street lighting, etc. will serve to create a safe and sustainable community. The use of CDBG funds to create and improve public facilities serving low and moderate income residents will foster greater community development and assist those facing the greatest challenges. Improved and greater access to public services is a high priority need reflected through consultation and evidence by the lack of resources and support to sufficiently meet the needs of those reliant upon support from the public or nonprofit sector.

The priority needs established within this section will serve as the framework for allocating City of Evanston CDBG, HOME, and ESG funding over the next five years.

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	The City of Evanston's housing market is characterized by high housing costs and a lack of sufficient housing for large low and moderate income families. There is a lack of affordable apartments with 3 or more bedrooms which would comfortably house larger low and moderate income families. TBRA will be used to assist families in securing affordable housing where they would otherwise not be able to do so without any assistance.
TBRA for Non-Homeless Special Needs	As stated above, the high cost of Evanston's housing market prevents low and moderate income residents from obtaining safe, decent, and affordable housing. The City of Evanston utilizes the TBRA program to assist, low and moderate income families, including those with special needs. It provides the city the ability to overcome the financial restrictions of Evanston's housing market.
New Unit Production	Evanston is a fully built out community which limits availability of land for new construction. This, paired with high building costs, makes it financially burdensome to produce new affordable housing units.
Rehabilitation	As stated above, the fully built out nature of Evanston necessitates the need for rehabilitation of the existing housing supply. The overall aged quality of Evanston's housing stock is an additional reason for the need for rehabilitation. Rehab of existing rental and homeowner housing will preserve and maintain the affordable housing supply and create the opportunity for low and moderate income residents to stay within the community.
Acquisition, including preservation	Acquisition, including preservation of affordable housing is a high need in Evanston however the high cost of housing in Evanston limits the ability to acquire new housing units. The increasingly high cost of housing warrants the need to utilize funds to acquire and preserve affordable housing units throughout the City of Evanston.

**Table 49 – Influence of Market Conditions**

**SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)**

**Introduction**

The anticipated resources section of the strategic plan describes the City of Evanston’s financial resources for the duration of the 2020-2024 Consolidated Plan. The financial resources listed are not all encompassing but serve to illustrate the City’s ability to use federal and local funding to address the priority needs and goals put forth in this plan. The funds are anticipated to be utilized by various regional and local government entities as well as the service providers which serve Evanston.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,836,315	105,431	68,222	2,009,968	7,200,000	Expected Amount Available for Remainder of ConPlan estimated at an annual grant of \$1,650,000 with \$150,000 in program income annually

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	364,350	27,384	0	391,734	1,344,000	Expected Amount Available for Remainder of ConPlan estimated at an annual grant of \$310,000 with \$26,000 in program income annually.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	158,463	0	0	158,463	600,000	Expected Amount Available for Remainder of ConPlan estimated at an annual grant of \$150,000

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Continuum of Care	public - federal	Conversion and rehab for transitional housing Overnight shelter Transitional housing	1,900,000	0	0	1,900,000	7,600,000	Expected Amount Available for Remainder of ConPlan estimated at \$1,900,000 annually in CoC funding for Evanston projects
LIHTC	public - federal	Multifamily rental new construction	7,390,000	0	0	7,390,000	7,000,000	Equity generated by the LIHTC awarded to Evergreen for 60-unit new construction
Other	public - local	Acquisition Multifamily rental new construction	1,000,000	0	0	1,000,000	500,000	Evanston Affordable Housing Fund resources for Evergreen project
Other	public - local	Public Services	863,373	0	0	863,373	3,450,000	Mental Health Board and Affordable Housing Funds to be spent on Public Services programs

**Table 50 - Anticipated Resources**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Federal funding will leverage private, state and local funds by enabling the City of Evanston to serve those with the greatest need at the highest capacity. Additionally, federal funds will serve as gap financing for City programs or service providers applications that require additional funding in order to have their program, project, or service come to fruition. The grant money provided by HUD will allow organizations and the City to successfully meet the needs of the community's most vulnerable members.

Evanston's ESG funds will be matched on a one to one basis using Mental Health Board funds from the City's General Fund, State funds and other resources including in-kind contributions, depending on the agencies funded, to meet the match requirement. HOME matching funds may be from the Affordable Housing Fund and sources such as the Federal Home Loan Bank and/or developers' contributions.

Additionally, a table listing specific unexpended CDBG funds from prior years for reallocation in FY 2020 is available in the appendix.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City of Evanston owns some properties and land that may be used to address the needs identified in the plan, particularly those that are located in the CDBG Target Area, which is primarily on the South and West sides of the City. In addition, some underutilized parking lots in southeast Evanston and irregular parcels of vacant land in north and east Evanston residential areas are being evaluated as sites for mixed income housing development to foster economic and racial/ethnic integration throughout Evanston.

**Discussion**

The City of Evanston will continue to pursue additional funding opportunities which will be used in order to complement existing resources.

## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
EVANSTON	Government	Economic Development Non-homeless special needs Planning neighborhood improvements public facilities public services	Jurisdiction
ALLIANCE TO END HOMELESSNESS IN SUBURBANK COOK COUNTY	Continuum of care	Homelessness	Region
Housing Authority of Cook County (HACC)	PHA	Public Housing	Region

**Table 51 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

The City of Evanston’s Community Development Department is the entity responsible for managing the federal grant funding afforded to it through HUD. One of the strengths of the Community Development Department is its staff and their knowledge of the federal grant system. City staff includes a Housing & Grants Manager, Housing Policy and Planning Analyst, Grants and Compliance Specialist, Financial Administrator, and an AmeriCorps VISTA. Staff is well versed in the rules and regulations pertaining to the CDBG, HOME, ESG, and other programs. The knowledge possessed by City staff affords them the ability to ensure compliance and enables the staff to spend their time efficiently allocating funds to community programs and organizations. Additionally, HUD’s audits of the City’s grants programs have all been favorable.

The City of Evanston’s institutional delivery system also possesses strength in its engaged community and elected officials. The City’s Aldermen and Mayor actively participate in community functions and encourage citizen participation at all levels of government. Evanston prides itself in the transparency of the governmental process and looks to its citizenry for input and support. Unique to the City of Evanston are its politically active and diverse citizens. Community members are aware of the needs of their community and are invested in future development, programs, and initiatives that would affect them.

The City’s elected officials and engaged citizenry support a vast network of the nonprofit service providers that serve Evanston’s most vulnerable populations. A large number of organizations provide services to the City’s low and moderate income residents in the fields of health, housing, education, employment, and many others. The nonprofit service providers strive to work in tandem with one another to create a web of services so as not to allow someone to fall through. The strength of Evanston’s institutional delivery system can be found in those organizations which serve the community.

Evanston is fortunate to have a capable and successful Community Housing Development Organization, Community Partners For Affordable Housing, operating within the community. The organization purchases foreclosed, abandoned, or neglected properties and rehabs the properties into affordable housing for the low and moderate income residents of the community. An efficient and capable CHDO operating within the community is a valued strength of the institutional delivery system. There are two other CHDOs that have been active in Evanston which could also be a future development partner.

Gaps in Evanston’s institutional delivery system relate primarily to funding. The reduction in federal funding to the CDBG, HOME, and ESG programs has resulted in a strain on the ability of the City to effectively administer these programs. Additionally, the reduction in federal funding ultimately impacts the nonprofit service providers reliant upon those funds to serve their focus populations. The current economic climate also limits the amount of private funding sources available to nonprofit service providers.

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X		
Mortgage Assistance			
Rental Assistance	X	X	
Utilities Assistance	X	X	
<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services	X	X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	



Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X		X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
<b>Other</b>			

**Table 52 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

The Alliance to End Homelessness in Suburban Cook County Continuum of Care provides a strategic and comprehensive response to homelessness in suburban Cook County, including the City of Evanston. The system administered by the CoC is designed to meet the needs of homeless persons including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. The CoC works with local organizations including Connections for the Homeless and the YWCA to ensure the needs of the community’s homeless are being addressed.

Connections for the Homeless provides direct support to homeless persons and those at risk of homelessness in Evanston. Services provided through Connections for the Homeless include homeless prevention, housing services, employment services, and outreach and supportive services. The homeless prevention program aims to assist those who are experiencing foreclosure or eviction. The program stabilizes their current situation and then works through case management and workshops to prevent the risk of homelessness from reoccurring in the future. Additionally, the Re-Housing Programs provided through Connections for the Homeless focus on assisting those who have lost their homes to find stable housing.

The organization also runs a transitional shelter, Hilda’s Place, to assist those in need of permanent supportive housing. Those assisted by these programs include the chronically homeless, those with serious physical or mental disabilities, and families with children. Connections also provides employment services for the homeless including job readiness training, job counseling and case management, and job development. The employment related programs assist homeless persons overcome their barriers to employment.

Outreach and support services provided by Connections include the Drop-In Program which provides clothing and toiletries, laundry and shower facilities, telephones and computers, locker storage, physical and mental health care screenings and monitoring, and clinical and recreational workshops. In addition to the Drop-In Program, health services provided through Connections include TB testing, Flu Shots, screenings and counseling care for diabetes and heart disease, HIV/AIDS testing and counseling, access

to financial assistance in paying for medications, medication management, psychiatric and mental health screenings (referrals and counseling), substance abuse screenings (referrals and counseling), and first aid assistance.

The YWCA provides services targeted toward homeless women and their families who are victims of domestic violence. The services provided include a 24-hour domestic violence hotline, emergency shelter (Mary Lou's Place), community counseling services, legal advocacy, relationship violence prevention, and community outreach and education.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

The strengths of the service delivery system in Evanston for meeting the needs of the special needs population and persons experiencing homelessness is the large network of service providers, nonprofit and government, that are effectively and actively serving the community. As stated previously, one strength of the service delivery system are the knowledgeable and experienced staff working in the City's various departments.

The area's Continuum of Care and the local service providers (Connections for the Homeless and YWCA) provide comprehensive services to the homeless population, including homeless special needs. The City's Health Department, Community Development Department, and the Parks, Recreation, and Community Services Department work under the guidance of the City's plans and goals to meet the needs of the community's special needs populations. Service providers work with the City in order to effectively coordinate their services to meet the needs of homeless and special needs persons.

Gaps in the service delivery system include reduced funding for mental health services, overnight homeless shelters with limited capacity, and a lack of an unaccompanied youth shelter. Interfaith Action provides emergency shelter in cold weather months and uses City funds, CDBG funds and private donations to provide services.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The City of Evanston is continuously coming up with new strategies to efficiently and effectively allocate the reduced funding from governmental and private sources. One possible strategy in addressing reduced funding is looking at ways to best use the limited resources. This would include funding a smaller number of projects but at higher levels. A project receiving a larger amount of funding would hopefully allow them to create something more substantive. Many of the City's service providers work with the Community Development Staff to ensure the probability of success for programs and funding

options. Determining the most appropriate funding source for a specific program will ensure that funds are being used effectively and at their highest capability.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2020	2024	Affordable Housing		Access to Rental Housing Maintain and Improve Rental Housing Maintain and Improve Owner Occupied Housing Homeownership	CDBG: \$2,881,443 HOME: \$785,000	Rental units constructed: 61 Household Housing Unit  Rental units rehabilitated: 10 Household Housing Unit  Homeowner Housing Rehabilitated: 25 Household Housing Unit  Buildings Demolished: 5 Buildings  Housing Code Enforcement/Foreclosed Property Care: 10000 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Homelessness	2020	2024	Homeless		Access to Rental Housing Public Services	CDBG: \$178,400 HOME: \$790,299 ESG: \$701,579	Tenant-based rental assistance / Rapid Rehousing: 127 Households Assisted  Homeless Person Overnight Shelter: 1500 Persons Assisted  Homelessness Prevention: 25 Persons Assisted  Other: 675 Other
3	Creating Livable Communities	2020	2024	Non-Housing Community Development		Public Infrastructure Public Facilities	CDBG: \$3,075,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 75000 Persons Assisted
4	Economic Development	2020	2024	Non-Housing Community Development		Economic Development	CDBG: \$225,000	Jobs created/retained: 7 Jobs  Businesses assisted: 7 Businesses Assisted
5	Public Services	2020	2024	Non-Homeless Special Needs		Public Services	CDBG: \$1,192,862	Public service activities other than Low/Moderate Income Housing Benefit: 100000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Planning and Administration	2020	2024				CDBG: \$1,657,263 HOME: \$160,435 ESG: \$56,884	

Table 53 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing
	<b>Goal Description</b>	The City of Evanston aims to increase, maintain, and improve affordable housing. The advanced age of Evanston's housing supply necessitates the need for rehabbing of existing housing. The creation of additional safe, decent, and affordable housing will allow low and moderate income residents the opportunity to remain in the community. Code enforcement is an important tool to maintaining safe and sanitary housing; additionally, inspections will monitor vacant or abandoned properties and identify blighted properties for demolition.
2	<b>Goal Name</b>	Homelessness
	<b>Goal Description</b>	The City of Evanston aims to support services to prevent homelessness and to assist those currently experiencing homelessness. These services include but are not limited to street outreach, rapid rehousing, and tenant based rental assistance. Greater emphasis will be placed on the housing first model (providing housing as opposed to homeless shelters) and coordinated entry.
3	<b>Goal Name</b>	Creating Livable Communities
	<b>Goal Description</b>	Creating livable communities through improvements to public facilities and infrastructure. Maintaining and improving the quality of Evanston's existing infrastructure and public facilities is instrumental to ensuring that residents live in a safe, clean, and decent environment.

4	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	Economic development will promote the vitality of Evanston's economy in depressed areas of the City. Fostering growth in these areas will in turn provide greater opportunities for the City's low and moderate income residents. Economic development activities include but are not limited to, workforce development and job training, and financial assistance to businesses.
5	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	Expanding the availability of and increasing access to needed services is a key goal. Services include, but are not limited to, mental health, job training and youth programs.
6	<b>Goal Name</b>	Planning and Administration
	<b>Goal Description</b>	Administration of CDBG, ESG, and HOME.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

The City is estimated to provide affordable housing to 160 extremely low income, low income, and moderate income families.

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

As previously stated in the Needs portion of this Consolidated Plan, the Housing Authority of Cook County is in the process of rehabilitating units in Evanston to be accessible for those with physical disabilities. According to HACC's 2014 PHA 5 Year and Annual Plan, HACC ratified a Voluntary Compliance Agreement to expand the number of accessible homes for low-income individuals with disabilities. Funds have been committed and are being spent to convert 95 units (a full 5% of its Low - Income Public Housing stock) for accessible use in conformity with the Uniform Federal Accessibility Code (UFAS). This UFAS construction also includes conversion of common area elements (such as accessible ramps, bathrooms and community kitchens) so that individuals with disabilities may share in the same benefits as non-disabled residents. In addition to the aforementioned UFAS construction work, the Authority acquired a supply of special fire/smoke/CO2 alarms sufficient to adapt 2% of its housing stock for individuals who live with auditory disabilities.

### **Activities to Increase Resident Involvements**

The Housing Authority of Cook Authority has a Resident Advisory Board (RAB) established at one of its sites in Evanston, the Walchirk building. Some of the RAB's functions include, but are not limited to: assisting residents with access to computers, offering in-house services such as change for laundry, copies, and postage. The RAB is currently seeking a new president, so their additional roles are still being established.

In addition, the HACC partners with the organization New Foundations- who offer supportive services to residents along with activities once a month. Exercise classes are offered once a week through a partnership with a local senior center.

HACC's Resident Service Coordinators work closely with other agencies such as the Levy Center to help our clients enhance their lives. Additional services are always being considered and added when possible.

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

No

### **Plan to remove the 'troubled' designation**



N/A

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

The City is partnering in the regional Assessment of Fair Housing (AFH) for which Cook County is the lead agency and Enterprise will provide staffing and technical assistance. The City expects to have data and most of the conclusions of this AFH to inform the development of its 2020-2024 Consolidated Plan. If the AFH is not completed prior to the submission of the City's new ConPlan, the City will review the final AFH when completed and amend its ConPlan as needed.

The primary barrier to affordable housing is the growing mismatch between incomes and housing costs in Evanston. The City's inflation-adjusted median household income rose 1% between 2009 and 2015, from \$69,544 to \$70,041. However, between 2004 and 2013, Evanston lost over 40% of its rental units affordable to households earning at or below 80% of area median income due to the rise in construction of high-cost rental developments. In addition, rents rose 16% from 2009 to 2015, far out-pacing the 1% increase in median income during the same time period. Minimum-wage, single income households and those depending on SSI payments cannot afford an apartment renting at the fair market rate in Cook County, and property taxes continue to represent an affordability concern for residents, particularly those with fixed incomes.

High property costs, particularly in predominantly single family neighborhoods with larger lot sizes and transit oriented corridors, has resulted in the concentration of affordable housing in west and south Evanston neighborhoods rather than being dispersed evenly. The stigma associated with affordable housing can be a barrier to siting affordable housing in areas of the City where currently none exist.

Another barrier to affordable housing within Evanston is the shortage of decent, affordable and accessible housing for persons with disabilities. The limited supply of affordable housing accessible to persons with physical disabilities is due in large part to the age of housing stock, most of which was built before the Americans with Disabilities Act was passed. Many of the City's older homes are difficult to retrofit for accessibility because they are multi-story units with stairs. This is true of smaller two-to-four flats as well as larger three or four-story walk-ups built in the 1930s and 1940s. Some facilities designed to accommodate people with mobility disabilities exist in Evanston, including the Hill Arboretum Apartments and two senior/disabled buildings that the HACC updated per its Section 504 Transition Plan. However, stakeholders and HACC waiting list data suggest that the unmet need for affordable accessible housing will continue to be significant.

The City's occupancy standards for rental housing that limits the number of unrelated persons residing in a single housing unit can be an additional barrier to affordable housing, particularly for non-traditional households. The City is evaluating an amendment to the ordinance; considerations include adopting a more open and inclusive definition of family or household, and basing occupancy on square footage and the configuration of the housing unit, which could expand the availability of affordable housing options and help maintain Evanston's socio-economic diversity.

## **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

In order to ensure that affordable housing is maintained and sufficient the City must proactively retain and develop new units. The City amended its inclusionary housing ordinance in 2018, effective January 1, 2019, to create more onsite affordable units in new multiunit developments throughout Evanston. In addition, the City of Evanston has previously utilized its federal CDBG and HOME funding towards the development of new affordable housing and the preservation of existing housing.

Similarly, the City began the process of creating an affordable housing plan in 2018 by appointing a Steering Committee of experts with diverse views on the affordable housing shortage and potential solutions. The Steering Committee began its outreach efforts at the end of 2018 with the goal of having a draft plan created in the first quarter of 2019. The outreach process is designed to include voices that are typically not heard in the public comment process, as well as provide an educational component to residents on proposed affordable housing strategies. These strategies include zoning changes to allow for accessory dwelling units, smaller lot sizes and increased density in areas traditionally zoned for single-family houses.

The City is actively examining its ordinances which prevent “non-traditional” larger families from living together. Encouraging policies which promote the ability of larger “non-traditional” families to live in the same dwelling unit will eliminate barriers faced by these families in finding affordable housing.

## **SP-60 Homelessness Strategy – 91.215(d)**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Connections for the Homeless has a Drop-In and Outreach program that offers basic services five days per week including food, clothing, showers, case management services, a housing locator, and physical and mental health services. Connections is the largest provider of services to Evanston’s homeless population, including the unsheltered homeless, and receives referrals from other local service providers including, but not limited to, Family Promise, Interfaith Action and the YWCA Evanston/North Shore. Case managers assess clients to determine their eligibility for Connections’ and other housing programs throughout the suburban Continuum of Care. These assessments inform the case plan that the case manager and client develop to identify goals and next steps. In addition to housing, case managers help clients connect to benefits, employment counseling/placement, health services, substance abuse counseling and education. The Outreach team visits soup kitchens, emergency rooms, libraries, coffee shops and other locations to actively reach out to homeless individuals. Connections anticipates serving 800-850 people through these programs in 2020.

### **Addressing the emergency and transitional housing needs of homeless persons**

Hilda’s Place, Connections for the Homeless’ 18-bed transitional shelter, and the YWCA Evanston-North Shore’s 34-bed domestic violence shelter are supported by the City with ESG and Mental Health Board funds. The YWCA provides shelter for up to 90 days, Hilda’s Place provides shelter as long as residents need to identify and secure a housing solution. Hilda’s Place historically has served an estimated 100 single adults and the YWCA housed an estimated 250 women and children who are victims of domestic violence. The YWCA expects to continue housing 250 women and children each year moving forward from 2020-2024.

Connections for the Homeless operates Hilda’s Place shelter following a “low barrier” model. This means clients are accepted to the program as they are, regardless of sobriety, income, or mental health. The shelter was previously supported by the U.S. Dept. of Housing & Urban Development funds through the CoC process. However, in 2015, Connections shifted this funding away from transitional shelter, following HUD’s funding recommendations, and moved it towards a new permanent supportive housing project. With this change in funding, Connections was able to increase the length of stay at the shelter. Now, the 18 clients residing at Hilda’s Place at any given point have as long as they need in the shelter to identify and secure a housing solution in partnership with their case manager.

With the change in the length of stay, Hilda’s Place is estimated to house 45 to 50 people annually. The average length of stay at the shelter is currently 6 months.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

The City will use ESG funds for re-housing as its primary strategy to reduce the amount of time that individuals and families (chronically homeless, families with children, veterans and their families, and unaccompanied youth) experience homelessness. The City expects to serve 10 households using rapid re-housing funds each year.

The City has approved HOME funds for Tenant Based Rental Assistance to address both the shortage of available affordable units, particularly for larger households, and the inability of some households to pay rents generally considered affordable due to the lack of ability to earn a living wage. Households with children under the age of 18, including those with children enrolled in Evanston schools that are doubled-up/unstably housed (category 2 in the new definition of homeless) are a priority population for the program. The City expects to enroll 5 new households each year for the next 5 years.

Heads of households in the TBRA program will receive education/job training in addition to rent assistance to develop the ability to earn living wages to maintain market rate housing independent of a subsidy.

ESG funds for homeless prevention address preventing individuals and families who were recently homeless from becoming homeless again. ESG-supported programs are required to provide case management and supportive services, and to connect clients with mainstream resources to increase their likelihood of achieving long-term housing stability. ESG-funded clients will receive follow-up contact to determine their housing status 6 and 18 months after termination of assistance as required and provide additional supports as needed to prevent households from becoming homeless again, as well as determine program outcomes. The City expects Connections will serve 5 households each year using prevention funds.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

ESG Prevention funds will be used as described above to help households with incomes below 30% of area median income avoid becoming homeless and re-housing funds will be used to help low-income households achieve housing stability. 2020 ESG Prevention funds are expected to help 10 households and TBRA funds are expected to help 5 households.

Evanston has two large Institutes of Mental Disease (IMDs) with a total of 562 beds whose residents are being evaluated for the capacity to live in community-based settings according to the terms of the Williams Consent Decree. City staff works with mental health agencies and the State of Illinois to identify potential housing options for eligible clients who choose to live in Evanston. The Alliance to End Homelessness in Suburban Cook County has a working group that is developing discharge policies and procedures for the region. In addition, the Housing and Homelessness Commission is evaluating whether to form a local Discharge Planning working group to look at community needs and policies that relate to the transition of households from publicly funded institutions and hospitals.

All agencies receiving ESG funds are required to connect households to mainstream benefits as available and appropriate for their needs. In addition, the City's Mental Health Board evaluates the effectiveness of collaborations/referrals of agencies applying for funds as a criterion for funding. One of the responsibilities of the HHC is to maintain and expand the coordination of community resources that are not under city control, and look for gaps in services and ways to improve efficiency.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

#### **How are the actions listed above related to the extent of lead poisoning and hazards?**

The actions undertaken by the City's Health Department are meant to eliminate the health hazards posed by lead based paint in Evanston's housing stock. As noted in previous sections, Evanston is an older community with the majority of housing built before 1980.

The large number of housing built before 1980 highlights the high probability of the risk of housing containing some amount of lead-based paint. As stated in previous sections, according to 2007-2011 ACS, 88% of owner-occupied housing units and 84% of renter-occupied housing units were built before 1980. There is a high likelihood that low and moderate income residents live in older housing units with lead based paint still present.

The City of Evanston's actions to screen for lead based paint hazards, to mitigate when necessary, and to inform homeowners and tenants of the hazards of lead-based paint are actions that will help reduce the extent of lead poisoning, particularly for the low-income households that are served by the City's HOME and CDBG programs.

#### **How are the actions listed above integrated into housing policies and procedures?**

The City's actions to address lead based paint hazards are integrated into housing policies and procedures in order to ensure a high level of quality of health for the City's residents. The City's CDBG funded housing rehab program is instrumental in helping to reduce lead based paint hazards when detected. Residents are able to apply for loans to rehabilitate their dwelling units and if lead based paint hazards are found they are removed.

All HOME and CDBG housing projects entered into between the City of Evanston and recipients of funding from those programs include language that the recipients must comply with lead-based paint regulations and policies as established by City, State and Federal laws and regulations, including specific policies related to lead-based paint in the CDBG and HOME programs.





## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

The City of Evanston’s anti-poverty strategy is focused on providing support to and fostering the development of at-risk individuals and families. Multiple programs and policies exist that are meant to assist those struggling with poverty.

The City of Evanston’s anti-poverty programs include the Certificate of Rehabilitation and Cradle to Career. The City partners with the James B. Moran Center for Youth Advocacy for the Certificate of Rehabilitation program which assists individuals in expunging or sealing their criminal histories. Individuals that may have made mistakes in the past are given an opportunity to become productive members of society where their criminal history does not act as a barrier to future growth. The Certificate of Rehabilitation program aims to provide greater opportunities. Similarly, the Cradle to Career program is meant to mobilize Evanston’s community assets to make a lasting difference in the lives of the community’s children, youth and families. The program is a community partnership between the City and various organizations including the Evanston Community Foundation. The goal of the program is that by the age of 23, all Evanston young adults will be leading productive lives, building on the resources, education, and support that they and their families have had to help them grow into resilient, educated, healthy, self-sufficient, and socially responsible adults. Promoting the development of a productive community starting with the youth and their families will ensure a future reduction in the number of poverty level families.

The City of Evanston also utilizes economic development techniques to work towards reducing the number of poverty-level families. The City’s Economic Development Department is actively involved in the development of underperforming commercial areas of the community and will continue to apply resources to create greater economic opportunities for depressed parts of Evanston. With greater economic development comes an increased opportunity for employment for the unemployed individuals and families in Evanston.

Evanston’s continued support of its CHDO, Community Partners For Affordable Housing, will work towards reducing the number of poverty-level families. Increased affordable housing provided through CPAH in Evanston will alleviate the high housing cost burden experienced by multiple families within the community.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

The City’s poverty-reducing goals, programs, and policies work to provide support and develop at-risk individuals and families. The 2020-2024 Consolidated Plan will serve as the framework for the City and service providers to adhere to in order to address the needs of the community. A coordinated approach to addressing the needs of the community will be accomplished through consultation with the 2020-

2024 Consolidated Plan and the Community Development Department. Poverty reduction is tied to multiple aspects of this plan and the various affordable housing strategies and other initiatives put forth will work towards reducing the number of families and individuals facing poverty.

## **SP-80 Monitoring – 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

CDBG Monitoring: Staff holds a mandatory pre-application orientation meeting, covering: eligible projects, income documentation, record-keeping requirements, and program outcomes. Staff conducts desk monitoring on all recipients by reviewing financials, income determination methods, compliance with cross-cutting requirements and outcomes. A risk analysis identifies agencies with the greatest need for site monitoring, based on type of project, previous experience with federal grants, and performance on prior grants and grant size. CDBG payments to subrecipients are disbursed from the City's General Fund, then drawn down in IDIS following approval of the City's Bills List. Recipients must submit reports at least twice per year, with required demographics of beneficiaries, progress toward achieving program goals, expenditures against budget and source documents CDBG expenses. Reports are reviewed by staff to ensure financial reasonableness and eligibility and progress of goals.

Davis-Bacon Compliance: Staff attends pre-construction meetings to provide technical support regarding Davis-Bacon compliance. A Project Manager is identified for each CDBG-funded construction project; they have primary responsibility for ensuring that procedures are followed and appropriate records are kept. Project Managers first review certified timesheets for compliance with prevailing wages, which are then provided to the City for review. Payments are made once certified timesheets are provided and reviewed for compliance.

HOME Monitoring: Projects are monitored to ensure that funds are being used for eligible expenses and that other contractual agreements are being met. In addition to any building inspections required during construction or rehab, inspections are conducted at the completion of each project, as well as on a 1, 2, or 3 year inspection schedule as required based on the project's affordability period. Inspections are conducted in tandem with the City's inspectors to ensure property and code compliance as well as to ensure that HOME eligible units are occupied by low/moderate income families, per HOME program regulations. Desk Reviews are conducted annually for all HOME-assisted rental and homebuyer projects with affordability requirements in place to determine compliance with the income and rent limits for HOME assisted rental units. Property owners document household income and size for each household using tenant-signed statements that include a clause allowing third party documentation of income. Source documents are required every sixth year for projects with affordability periods of 10 or more years. Projects in development are monitored by the Housing Planner for budget changes, payment requests, marketing and compliance with other project terms. Construction progress is assessed by the City Inspector prior to any payments, which are approved by the Community Development Director.

ESG Monitoring: Subrecipients submit reports and source documents for ESG-funded expenditures, which are reviewed by City staff for accuracy and compliance with federal requirements. ESG

subrecipients are paid on a reimbursement basis following submission of documentation of eligible expenditures. Payments are made from the City's General Fund and then drawn down in IDIS.

NEPA Compliance: Activities are reviewed for compliance with the National Environmental Protection Act (NEPA). Most are determined to be exempt or categorically excluded; none required a full environmental review. Environmental reviews are conducted for housing rehab and economic development projects when specific project sites were identified.

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

The anticipated resources section of the strategic plan describes the City of Evanston’s financial resources for the duration of the 2020-2024 Consolidated Plan. The financial resources listed are not all encompassing but serve to illustrate the City’s ability to use federal and local funding to address the priority needs and goals put forth in this plan. The funds are anticipated to be utilized by various regional and local government entities as well as the service providers which serve Evanston.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,836,315	105,431	68,222	2,009,968	7,200,000	Expected Amount Available for Remainder of ConPlan estimated at an annual grant of \$1,650,000 with \$150,000 in program income annually

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	364,350	27,384	0	391,734	1,344,000	Expected Amount Available for Remainder of ConPlan estimated at an annual grant of \$310,000 with \$26,000 in program income annually.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	158,463	0	0	158,463	600,000	Expected Amount Available for Remainder of ConPlan estimated at an annual grant of \$150,000

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Continuum of Care	public - federal	Conversion and rehab for transitional housing Overnight shelter Transitional housing	1,900,000	0	0	1,900,000	7,600,000	Expected Amount Available for Remainder of ConPlan estimated at \$1,900,000 annually in CoC funding for Evanston projects
LIHTC	public - federal	Multifamily rental new construction	7,390,000	0	0	7,390,000	7,000,000	Equity generated by the LIHTC awarded to Evergreen for 60-unit new construction
Other	public - local	Acquisition Multifamily rental new construction	1,000,000	0	0	1,000,000	500,000	Evanston Affordable Housing Fund resources for Evergreen project
Other	public - local	Public Services	863,373	0	0	863,373	3,450,000	Mental Health Board and Affordable Housing Funds to be spent on Public Services programs

**Table 54 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Federal funding will leverage private, state and local funds by enabling the City of Evanston to serve those with the greatest need at the highest capacity. Additionally, federal funds will serve as gap financing for City programs or service providers applications that require additional funding in order to have their program, project, or service come to fruition. The grant money provided by HUD will allow organizations and the City to successfully meet the needs of the community’s most vulnerable members.

Evanston's ESG funds will be matched on a one to one basis using Mental Health Board funds from the City's General Fund, State funds and other resources including in-kind contributions, depending on the agencies funded, to meet the match requirement. HOME matching funds may be from the Affordable Housing Fund and sources such as the Federal Home Loan Bank and/or developers' contributions.

Additionally, a table listing specific unexpended CDBG funds from prior years for reallocation in FY 2020 is available in the appendix.



**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City of Evanston owns some properties and land that may be used to address the needs identified in the plan, particularly those that are located in the CDBG Target Area, which is primarily on the South and West sides of the City. In addition, some underutilized parking lots in southeast Evanston and irregular parcels of vacant land in north and east Evanston residential areas are being evaluated as sites for mixed income housing development to foster economic and racial/ethnic integration throughout Evanston.

**Discussion**

The City of Evanston will continue to pursue additional funding opportunities which will be used in order to complement existing resources.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2020	2024	Affordable Housing		Access to Rental Housing Maintain and Improve Rental Housing Maintain and Improve Owner Occupied Housing	CDBG: \$556,443 HOME: \$175,000	Rental units rehabilitated: 2 Household Housing Unit Homeowner Housing Rehabilitated: 7 Household Housing Unit Buildings Demolished: 1 Buildings Housing Code Enforcement/Foreclosed Property Care: 2000 Household Housing Unit
2	Homelessness	2020	2024	Homeless		Access to Rental Housing Public Facilities Public Services	CDBG: \$38,000 HOME: \$180,299 ESG: \$146,579	Tenant-based rental assistance / Rapid Rehousing: 25 Households Assisted Homeless Person Overnight Shelter: 300 Persons Assisted Homelessness Prevention: 5 Persons Assisted Other: 75 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Creating Livable Communities	2020	2024	Non-Housing Community Development		Public Infrastructure Public Facilities	CDBG: \$750,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1 Households Assisted
4	Economic Development	2020	2024	Non-Housing Community Development		Economic Development	CDBG: \$75,000	Jobs created/retained: 1 Jobs Businesses assisted: 1 Businesses Assisted
5	Public Services	2020	2024	Non-Homeless Special Needs		Public Services	CDBG: \$253,262	Public service activities other than Low/Moderate Income Housing Benefit: 20000 Persons Assisted
6	Planning and Administration	2020	2024				CDBG: \$337,263 HOME: \$36,435 ESG: \$11,884	

Table 55 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing
	<b>Goal Description</b>	The City of Evanston aims to increase, maintain, and improve affordable housing. The advanced age of Evanston's housing supply necessitates the need for rehabbing of existing housing. The creation of additional safe, decent, and affordable housing will allow low and moderate income residents the opportunity to remain in the community.
2	<b>Goal Name</b>	Homelessness
	<b>Goal Description</b>	The City of Evanston aims to support services to prevent homelessness and to assist those currently experiencing homelessness. These services include but are not limited to street outreach, rapid rehousing, and tenant based rental assistance. Emphasis will be placed on the housing first model (providing housing as opposed to homeless shelters).
3	<b>Goal Name</b>	Creating Livable Communities
	<b>Goal Description</b>	Creating livable communities through improvements to public facilities and infrastructure. Maintaining and improving the quality of Evanston's existing infrastructure and public facilities is instrumental to ensuring that residents live in a safe, clean, and decent environment.
4	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	Economic development will promote the vitality of Evanston's economy in areas of the City that have historically received less investment. Fostering growth in these areas will in turn provide greater opportunities for the City's low and moderate income residents. Economic development activities include but are not limited to, workforce development and job training, and financial assistance to businesses.
5	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	Improving equitable access to public services for Evanston residents, particularly for historically underserved segments of our population, is a key goal of the City. As seen through input from the community and consultation, there is a high need for public services including, but are not limited to after school and summer youth programs, senior services, and health services.
6	<b>Goal Name</b>	Planning and Administration
	<b>Goal Description</b>	Administration of CDBG, ESG, and HOME.



# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The City has identified the following projects to be implemented in 2020 to achieve the goals in the Consolidated Plan. The Emergency Solutions Grant project will address the needs of homeless individuals, families and households fleeing domestic violence. The Tenant Based Rental Assistance (TBRA) project will address the needs of homeless families with children with direct rental and utilities assistance. The Rental Housing project combines both HOME and CDBG activities, both which are for rental rehabilitation.

### Projects

#	Project Name
1	ESG
2	Tenant Based Rental Assistance (TBRA)
3	Rental Housing
4	Homeowner Rehabilitation
5	Code Enforcement
6	Public Services
7	Economic Development
8	Public Facilities & Infrastructure
9	Administration

Table 56 – Project Information

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	ESG
	<b>Target Area</b>	
	<b>Goals Supported</b>	Homelessness
	<b>Needs Addressed</b>	Access to Rental Housing
	<b>Funding</b>	:
	<b>Description</b>	Homeless prevention, rapid re-housing, street outreach, overnight shelters, and administration of program.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	There will be 395 beneficiaries of ESG-funded activities, a combination of single persons, couples, households with children and households fleeing from domestic violence.
	<b>Location Description</b>	The activities will be throughout the City of Evanston.
	<b>Planned Activities</b>	Direct rental assistance, supportive services, shelter operations, and street outreach. Administration of ESG program.
2	<b>Project Name</b>	Tenant Based Rental Assistance (TBRA)
	<b>Target Area</b>	Entire Jurisdiction
	<b>Goals Supported</b>	Homelessness
	<b>Needs Addressed</b>	Access to Rental Housing
	<b>Funding</b>	:
	<b>Description</b>	Direct rental and utilities assistance.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	Entire jurisdiction.
	<b>Planned Activities</b>	Rent and utilities assistance for McKinney-Vento families with children under 18 to achieve housing stability and economic independence.
3	<b>Project Name</b>	Rental Housing
	<b>Target Area</b>	CDBG TARGET AREA
	<b>Goals Supported</b>	Affordable Housing



	<b>Needs Addressed</b>	Access to Rental Housing Maintain and Improve Rental Housing
	<b>Funding</b>	:
	<b>Description</b>	Rental housing development or rehabilitation
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	999-1015 Howard Street and 1930 Jackson Avenue.
	<b>Planned Activities</b>	CDBG will be used for rehab of rental units for households with incomes at 80% AMI. HOME funding will be used for new rental housing construction, the 60-unit CJE/Evergreen Senior Housing and a CHDO project.
<b>4</b>	<b>Project Name</b>	Homeowner Rehabilitation
	<b>Target Area</b>	Entire Jurisdiction
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Maintain and Improve Owner Occupied Housing
	<b>Funding</b>	:
	<b>Description</b>	Rehabilitation of owner-occupied homes throughout Evanston, owned by low- and moderate-income populations
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	To be determined based on applications received.
	<b>Planned Activities</b>	Substantial rehab. and emergency rehab. of income eligible, owner-occupied housing.
<b>5</b>	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	CDBG TARGET AREA
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Maintain and Improve Rental Housing Maintain and Improve Owner Occupied Housing

	<b>Funding</b>	:
	<b>Description</b>	Code enforcement inspections in the CDBG Target Area, including necessary building demolition/clearance or rehabilitation as identified by code enforcement inspectors.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Project benefits over 20,000 households living in the CDBG target area.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Code enforcement inspections in the CDBG Target Area, including necessary building demolition/clearance as identified by code enforcement inspectors.
<b>6</b>	<b>Project Name</b>	Public Services
	<b>Target Area</b>	Entire Jurisdiction
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	:
	<b>Description</b>	Public (social) services to low- and moderate- income residents throughout the City of Evanston, particularly for youth programs, senior services, graffiti removal, housing services and domestic violence services.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
<b>Planned Activities</b>	Public (social) services to low- and moderate- income residents throughout the City of Evanston, particularly for youth programs, senior services, graffiti removal, housing services and domestic violence services.	
<b>7</b>	<b>Project Name</b>	Economic Development
	<b>Target Area</b>	CDBG TARGET AREA
	<b>Goals Supported</b>	Economic Development

	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	:
	<b>Description</b>	Economic development activities aimed at assisting businesses for the purpose of job creation for low- and moderate- income persons.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Loans or grants to businesses for job creation or retention, and technical assistance to micro-enterprises.
8	<b>Project Name</b>	Public Facilities & Infrastructure
	<b>Target Area</b>	Entire Jurisdiction
	<b>Goals Supported</b>	Creating Livable Communities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	:
	<b>Description</b>	Improvements made to public facilities and infrastructure.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	Public infrastructure activities are primarily in the CDBG target area. Public facilities are qualified using LMC and may be located anywhere in the city. Public facilities are in areas with 51%+ low/mod residents, primarily in the CDBG target area.
	<b>Planned Activities</b>	
9	<b>Project Name</b>	Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	:

	<b>Description</b>	Administration of CDBG and HOME.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

It is estimated that over 90% of all CDBG, HOME and ESG funding will be allocated to benefit persons who are low- and moderate- income. Some projects will be directed across the entire jurisdiction, such as public services and homeowner rehabilitation, whereas others will be directed to the CDBG Target Area (local target area). Some activities, including Code Enforcement and Graffiti Removal, are limited to the CDBG Target Area.

Additionally, it is expected that a significant amount of housing and economic development funds will be focused in the CDBG Target Area.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
CDBG TARGET AREA	60

**Table 57 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

All activities funded will primarily benefit low- and moderate- income persons or households, either as direct service or financial assistance or by making improvements in areas benefitting primarily low- and moderate- income persons. Some activities, for reasons of qualification and/or desired beneficiaries, will be focused geographically. Some examples of how the City anticipates geographically focused investments are:

**Public Infrastructure Improvements** – By their nature, they must be in low- and moderate- income Census Tracts/Block Groups, which are primarily located in the CDBG Target Area. Most of the eligible block groups are located in the South and West areas of the City. It is anticipated that funded public infrastructure improvements, including but not limited to alley paving and park improvements, will be primarily focused in the Target Area.

**Economic Development** – The areas that have high vacancy and/or unemployment are the Howard Street, Church and Dodge, and Simpson commercial corridors. Economic development activities will be heavily focused in these areas that are located in the CDBG Target Area.

**Code Enforcement** – Although Code Enforcement inspectors perform inspections citywide, the CDBG-funded portion of code enforcement will be within the CDBG Target area, which will be paired with

other community development activities in the area to address areas of deterioration, maintaining code enforcement and property standards of dwelling units in the area.

Other programs or projects may take place within the CDBG Target area, but they will not be exclusively so. An example of this is the CDBG Housing Rehab Program, which benefits all low- and moderate-income homeowners, as it will likely have a large investment in the CDBG Target Area, as this area is host to the highest population of low- and moderate- income households

## **Discussion**

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

There are a number of housing initiatives that will be implemented in 2020 to support homeless, non-homeless and special-needs residents who are in need of safe and affordable housing, including the CJE/Evergreen Senior Housing project that will be completed and reported in a future year. The programs that impact the most persons or households in 2020 are the tenant-based rental assistance program (TBRA) and the housing rehab program, which serve two very different, yet vital housing needs for the low- and moderate- income residents of Evanston.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	25
Non-Homeless	5
Special-Needs	0
Total	30

**Table 58 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	30
The Production of New Units	0
Rehab of Existing Units	9
Acquisition of Existing Units	0
Total	39

**Table 59 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Housing Authority of Cook County (HACC) serves suburban Cook County, including Evanston. The HACC administers the Housing Choice Voucher program in Evanston and has two buildings for seniors and the disabled, scattered site units for families, as well as seven project-based Section 8 units in Emerson Square.

### **Actions planned during the next year to address the needs to public housing**

The Housing Authority of Cook County (HACC) is planning substantial renovation of its scattered site family units in 2020. In addition, HACC and the City are in the concept stages of planning a second housing development with approximately 120 units on the parking lot of the Jane R Perlman Senior Apartments. This development would be mixed income, with some units at 50% AMI with PBV support, some between 80% and 120% AMI, the “missing middle” market, and some at market rate. In addition, a joint project on South Boulevard just east of Chicago Avenue is being discussed on a City-owned parking lot that is adjacent to a four unit HACC building that has family units (2- and 3-bedrooms). The development would better utilize land in a Transit-Oriented location through the development of a mixed income rental project comprising public housing, moderate income, and market rate units, a mix of studios, 1-, 2-, and 3-bedroom units. Different financing options are being evaluated for both projects.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

The HACC has a Resident Advisory Board (RAB) established at one of its sites in Evanston, the Walchirk building. The RAB’s functions include, but are not limited to: assisting residents with access to computers, offering in-house services such as change for laundry, copies, and postage. RAB activities are somewhat limited during the rehab of Walchirk and Perlman buildings and are also affected by reduced occupancy.

HACC’s Resident Service Coordinators work closely with other agencies, including the City’s Levy Center, to help its residents access services and participate in activities throughout the community. Additional services are always being considered and added when possible.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**



The HACC is not designated as troubled.

### **Discussion**

The City will continue to actively engage and communicate with HACC to ensure that the needs of residents assisted by that agency are met and services are coordinated with other agencies for efficient and effective use of all community resources.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The following section discusses the homeless and special needs activities to be undertaken in Evanston during the first year of the 2020-2024 Consolidated Plan.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Connections for the Homeless' homeless outreach program is the largest provider of services to Evanston's homeless population, including the unsheltered homeless, and addresses a wide range of needs. Case managers develop individualized case plans for each client; assist them to obtain housing and access services that may include employment counseling/placement, health services, substance abuse counseling and education. Connections for the Homeless works in partnership with the Alliance to End Homelessness in Suburban Cook County and local providers including, but not limited to, Interfaith Action, Family Promise, the Men's Residence at the McGaw YWCA, the YWCA of Evanston/North Shore; all agencies provide housing and case management services to people experiencing homelessness or at risk of homelessness. Connections participates in Coordinated Entry and follows progressive engagement strategies as required. Agency anticipates serving 850 people in FY 2020, 425 of whom will be Evanston residents through the Drop-In program which includes outreach to soup kitchens, emergency rooms, libraries and other locations to actively reach out to homeless individuals.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Hilda's Place, Connections for the Homeless' 19-bed transitional shelter, and the YWCA Evanston-North Shore's 34-bed domestic violence shelter are supported by the City with ESG and Mental Health Board funds. The YWCA provides shelter for up to 90 days and Hilda's Place provides shelter for up to a year. Hilda's Place historically has served an estimated 120 single adults and the YWCA housed an estimated 250 women and children who are victims of domestic violence.

The YWCA expects to continue housing 250 women and children each year moving forward from 2020-2024.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The City will use ESG funds for re-housing as its primary strategy to reduce the amount of time that individuals and families (chronically homeless, families with children, veterans and their families, and unaccompanied youth) experience homelessness. The City expects to serve 10 households using rapid re-housing funds in 2020.

The City has recently approved HOME funds for Tenant Based Rental Assistance to address both the shortage of available affordable units, particularly for larger households, and the inability of some households to pay rents generally considered affordable due to the lack of ability to earn a living wage. Households with children under the age of 18, including those with children enrolled in Evanston schools that are doubled-up/unstably housed (category 2 in the new definition of homeless) are a priority population for the program. The City expects to enroll 5 new households in 2020.

ESG funds for homeless prevention address preventing individuals and families who were recently homeless from becoming homeless again. ESG-supported programs are required to provide case management and supportive services, and to connect clients with mainstream resources to increase their likelihood of achieving long-term housing stability. ESG-funded clients will receive follow-up contact to determine their housing status 6 and 18 months after termination of assistance as required and provide additional supports as needed to prevent households from becoming homeless again, as well as determine program outcomes. The City expects Connections will serve 10 households in 2020.

Heads of households in the TBRA program will receive education/job training in addition to rent assistance to develop the ability to earn living wages to maintain market rate housing independent of a subsidy.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

ESG Prevention funds will be used as described above to help households with incomes below 30% of area median income avoid becoming homeless and re-housing funds will be used to help low-income households achieve housing stability. 2020 ESG Prevention funds are expected to help 10 households and TBRA funds are expected to help 5 households.

Evanston has two large Institutes of Mental Disease (IMDs) with a total of 562 beds whose residents are being evaluated for the capacity to live in community-based settings according to the terms of the Williams Consent Decree. City staff works with mental health agencies and the State of Illinois to identify potential housing options for eligible clients who choose to live in Evanston. Agencies receiving ESG will follow procedures and policies set forth by the Alliance to End Homelessness in Suburban Cook County.

All agencies receiving ESG funds are required to connect households to mainstream benefits as available and appropriate for their needs. In addition, the City's Mental Health Board evaluates the effectiveness of collaborations/referrals of agencies applying for funds as a criterion for funding. One of the responsibilities of the Housing & Homeless Commission is to maintain and expand the coordination of community resources that are not under city control, and look for gaps in services and ways to improve efficiency.

## **Discussion**

The City of Evanston will continue to collaborate with the Alliance to End Homelessness in Suburban Cook County Continuum of Care in order to address the needs of homeless individuals and families in Evanston.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

The City is partnering in the regional Assessment of Fair Housing (AFH) for which Cook County is the lead agency and Enterprise will provide staffing and technical assistance. The City expects to have data and most of the conclusions of this AFH to inform the development of its 2020-2024 Consolidated Plan. If the AFH is not completed prior to the submission of the City's new ConPlan, the City will review the final AFH when completed and amend its ConPlan as needed.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The City of Evanston amended its Inclusionary Housing Ordinance (IHO) in late 2015 with an effective date of January 1, 2016. To date, several rental projects have been approved that are subject to the IHO, resulting in the creation of 41 new rental units and a \$2.4 million fee-in-lieu payment in 2019. Due to rising land and construction costs that have pushed the per unit cost of new development over \$300,000 in transit oriented areas, it is much more cost effective for developers to pay the fee-in-lieu of on-site units. As a result, the City put together a Subcommittee in 2018 to evaluate revisions to the IHO in order to better incentivize on-site affordable units, including raising the fee-in-lieu, because the current \$75,000 - \$100,000 per unit will not fund construction of a comparable number of affordable units, particularly in the City's transit-oriented areas. Revisions to the IHO were approved in 2018, with an effective date of January 1, 2019. In addition, the mayor appointed a steering committee in 2018 to oversee the development of an affordable housing plan. It is anticipated that the process will take 15 months, and a draft plan will be completed in the first quarter of 2020. The City is currently evaluating and implementing a range of strategies to address the need for rental and ownership housing affordable to households up to 120% of AMI and to integrate affordable housing more equitably throughout the city. The affordable housing plan will also help to prioritize funding and implementation of the various strategies currently being evaluated. The strategies being considered are listed below:

- New sources to fund affordable housing needs are being evaluated, including fees on developments not covered by the IHO and taxes on vacation rentals
- Zoning changes to facilitate the development of accessory dwelling units (ADUs) in addition to coach houses that are currently allowed for rental to people unrelated to the family in the primary unit. non-family member HHs
- Zoning changes to allow development of modest sized single-family homes on smaller lots than currently allowed and/or a special use that enables the development of multiple small-scale

homes on existing City lots

- Contributions of City-owned land for affordable housing development
- First-time homebuyer programs working with local banks that are members of the Federal Home Loan Bank
- Use of land trust to reduce the of home ownership and maintain long-term affordability
- Expansion of affordable housing preservation programs, particularly targeting owner-occupied two-flats that comprise a substantial part of Evanston's naturally occurring affordable rental and affordable home ownership
- More effective partnerships with other funders and developers

### **Discussion:**

The primary barrier to affordable housing is the continuing mismatch between incomes and housing costs in Evanston. Evanston lost 70.7% of its units renting for less than \$700 between 2000 and 2011, while the number of units renting for more than \$1,000 increased by two-thirds. Minimum-wage, single income households and those depending on Social Security Income (SSI) payments cannot afford an apartment renting at the fair market rate in Cook County. Additionally, property taxes continue to represent an affordability concern for residents, particularly those with fixed incomes.

High property costs, particularly in predominantly single family neighborhoods with larger lot sizes and transit oriented corridors, have resulted in the concentration of affordable housing in west and south Evanston neighborhoods rather than being dispersed evenly. The stigma associated with affordable housing can be a barrier to siting affordable housing in areas of the City where currently none exist.

Another barrier to affordable housing within Evanston is the shortage of decent, affordable and accessible housing for persons with disabilities. The supply of affordable housing accessible to persons with physical disabilities is due in large part to the age of housing stock, most of which was built before the Americans with Disabilities Act was passed. Much of the City's older homes are difficult to retrofit for accessibility because they are multi-story units with stairs. This is true of smaller two-to-four flats as well as larger three- or four-story walk-ups built in the 1930s and 1940s. Some facilities designed to accommodate people with mobility disabilities exist in Evanston, including the two buildings HACC updated per its Section 504 Transition Plan. However, stakeholders and HACC waiting list data suggest that the unmet need for affordable accessible housing will continue to be significant.

The City's occupancy standards for rental housing that limits the number of unrelated persons residing in a single housing unit can be an additional barrier to affordable housing, particularly for non-traditional households.

The City of Evanston wants to ensure that it is the most livable city for all of its residents. In order to most effectively address the housing needs of its low-, moderate-, and middle-income residents, and

maintain its economic and racial diversity, priority for income restricted rental and ownership units will be given to eligible households that live in Evanston or have a household member that works in Evanston wherever possible and in compliance with fair housing. The City has developed a centralized wait list for income restricted units developed through the Inclusionary Housing Ordinance to facilitate access to affordable housing for its residents. Properties with income restricted units not developed through the IHO may choose to get referrals from this centralized wait list to expand its effectiveness. Rental assistance programs funded with HOME, ESG and local funds will be used in Evanston to the greatest extent feasible to minimize displacement of lower income residents.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The following are actions to be undertaken by the City of Evanston to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead based paint hazards, reduce the number of property-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies.

### **Actions planned to address obstacles to meeting underserved needs**

Through consultation, three needs were identified as underserved:

- Youth programming and services
- Education and employment related services for young adults
- Energy efficiency improvements.

In addition to the social services funded by the City to address youth programming needs, the Cradle to Careers collective impact initiative is working to develop a community-wide method of assessing unmet needs and progress to address them so that all Evanston youth get the education and other supports they need to be independent, self-sufficient members of society by age 23. This is focused heavily on youth services, with an additional focus on job training and skills for young adults transitioning into independence.

The City's cross departmental taskforce that identifies gaps in services for all at-risk populations in the City continues to meet on a quarterly basis. Topics include addressing individual residents with complex needs, as well as situations like hoarding that affect multiple City staff and departments. One of the initiatives from that group is how to use the City's 311 service to more effectively direct callers to resources, whether at the City or in the community. A new centralized database for case management and referrals was implemented in 2017 to more effectively coordinate client services from multiple departments.

Community Development continues to work with the City's Sustainability division to help businesses and residents to capitalize on existing incentives and rebate programs offered by ComEd, Nicor and others to make environmentally- and economically-friendly improvements to their properties. Where possible, these will be incorporated into the CDBG Housing Rehab Program.

Concerned about the advancing crisis of climate change, Evanston signed the U.S. Mayors Climate Protection Agreement in 2006, pledging to reduce greenhouse gas (GHG) emissions by 13% by 2012 relative to a 2005 baseline. That goal was achieved in mid-summer of 2013, not by mobilizing Evanston residents to make their homes more energy efficient or to change their day-to-day behaviors, but rather



through the City's initiatives to reduce its own energy use and by the decision of voters and the City Council to embrace 100% renewable energy for Evanston residents and small businesses. The more ambitious goal of the Livability Plan is a 20% reduction in GHG emissions by 2016. This aligns with the GHG Mitigation objective in the STAR Community Rating System and is key to Evanston's livability goals of healthy citizens and a healthier environment for all of Evanston. The plan was developed in collaboration between the City of Evanston Office of Sustainability and Sustain Evanston, a network of citizens and over 20 organizations that support initiatives and projects to improve the sustainability of Evanston. Strategies to achieve this goal include energy retrofits of 280 single-family homes each year, as well as multi-family housing and business/ commercial retrofits. Energy Impact Illinois, a program offering low-cost home energy assessments and generous instant rebates to cover the cost of weatherization improvements, is a key tool to achieving this, but low and moderate income homeowners often lack the resources to participate in this and similar programs. Staff continues to work on a funding strategy to address this to improve the condition and affordability of Evanston's housing stock.

### **Actions planned to foster and maintain affordable housing**

Evanston continues to research new and alternative ways to create more affordable housing, including rental of accessory dwelling units, to expand affordable housing. The City also began working with the Metropolitan Tenants Organization (MTO) and Lawyers' Committee for Better Housing (LCBH) in 2018 to strengthen landlord/tenant relations, particularly for low-income households with subsidies, and increase awareness of landlord-tenant rights and responsibilities. This contract was renewed for another 12 months in 2019. Additionally, the partnership with LCBH will provide low-income residents with legal assistance and representation in cases of evictions, retaliation, illegal lockouts, etc.

The City of Evanston has a locally funded Affordable Housing Fund, which is used for the development and rehab of affordable housing for persons up to 120% of the area median income. This provides funding in addition to CDBG and HOME funds to develop and maintain much-needed affordable housing throughout Evanston. For 2018, 2019 and 2020, City Council named expanding affordable housing options as one of its annual goals. Several strategies have been researched and discussed by City Council, such as the creation and rental of accessory dwelling units, zoning changes to allow for smaller lots, and the use of City-owned land for affordable housing development. In addition, City Council approved the creation of a Landlord Rehabilitation Assistance Program, rental of existing coach houses to non family members, and amendments to the City's Inclusionary Housing Ordinance. Furthermore, the mayor appointed a steering committee in 2018 to oversee the development of an affordable housing plan. The steering committee will work with the City's Housing and Homelessness Commission to conduct outreach and solicit feedback on the plan from Evanston residents and stakeholders. It is anticipated that the process will take 15 months, and a draft plan will be completed in the first quarter of 2020. The plan will then be used to prioritize affordable housing strategies and funding.

### **Actions planned to reduce lead-based paint hazards**

As mentioned above, the Evanston HHS receives the TORRENS grant from Cook County Department of Public Health which offers a yearly maximum of \$39,600 of financial assistance for low income property owners. They also receive a yearly grant of \$24,900 from the Illinois Department of Public Health to aid in paying for testing and inspection supplies.

In addition to responding to cases of childhood lead poisoning the Evanston HHS also provides preventative lead risk assessments for Evanston residents as long as there is either a child age 6 or less or a pregnant woman is living at the property. This is a proactive service offered to the residents of Evanston to help them become aware of the possible lead hazards in their home along with preventing their child from becoming lead poisoned.

### **Actions planned to reduce the number of poverty-level families**

There are a variety of actions the City undertakes throughout the year in an effort to reduce the number of poverty-level families and increase self-sufficiency. The programs funded through CDBG and / or HOME that work towards this goal are the tenant-based rental assistance (TBRA) program, Certificate of Rehab program and a variety of other job training and education programs aimed at youth and young adults. Additionally, the City's investment in the Cradle to Career program demonstrates its commitment to ensuring that Evanston residents are prepared for the workforce.

Additionally, the City's Economic Development Department works diligently to grow the City's economy, specifically by working to redevelop vacant or underperforming commercial corridors. Developing a variety of businesses in Evanston is critical to providing living-wage jobs for a diverse population with multiple jobs skills and experiences. Economic Development is accomplished by utilizing many different funding sources including, but not limited to, the CDBG Economic Development Fund, tax-increment financing (TIF) and local funds.

### **Actions planned to develop institutional structure**

City staff works throughout the year to increase institutional structure, both within the City and throughout our partner agencies. This is accomplished through providing technical assistance on federal grant management requirements, such as growing their knowledge of Davis-Bacon requirements, financial management and other grant management procedures. Staff maintains contact with partner agencies throughout the year, offering referrals for funding and training opportunities where

appropriate.

All policies and procedures related to internal grant management procedures are being reviewed, and will be updated when areas of opportunity for efficiency and collaboration are identified. Additionally, investment is made in technology that assists departments within the City to more effectively and efficiently manage grant programs; an example is CDM, which is the City's management software program for all housing-related projects that require project or loan management and ongoing compliance. Staff also attends relevant training and conferences, where available, on all aspects of grant and project management.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The City is heavily invested in collaborations throughout the community, as evidenced by Cradle to Career, the Human Services Task Force on At-risk populations and other initiatives. The City has successfully paired with multiple health-service providers, such as Erie Family Health Center, which provides bi-lingual medical, dental and mental health services to the community, regardless of the person's ability to pay. This has been a critical partnership that has increased the community's access to quality, affordable healthcare.

Additionally, the City's General Assistance program is currently being evaluated to see where opportunities exist to coordinate better between the City and public agencies and service providers to better serve our underserved residents. There are other community collaborations in Evanston, such as the United Way "Community Schools" program, which works to provide services to the schools with the most at-risk students. Collaborations such as these are critical to furthering the goals of our Consolidated Plan and that of the City Council, which both aim to make Evanston one of the most livable cities in America.

### **Discussion:**

The City's Community Development Department working in collaboration with the Economic Development Department is committed to making Evanston the most livable city in America, and has evidenced this commitment through community partnerships, investment in economic and neighborhood development. The actions identified above will further this initiative and will increase opportunities for low- and moderate- income residents to receive necessary services and have access to affordable housing options.

## **Program Specific Requirements**

### **AP-90 Program Specific Requirements – 91.220(I)(1,2,4)**

#### **Introduction:**

#### **Community Development Block Grant Program (CDBG)**

##### **Reference 24 CFR 91.220(I)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed
  2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan
  3. The amount of surplus funds from urban renewal settlements
  4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.
  5. The amount of income from float-funded activities
- Total Program Income

#### **Other CDBG Requirements**

1. The amount of urgent need activities

#### **HOME Investment Partnership Program (HOME)**

##### **Reference 24 CFR 91.220(I)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:
2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:
3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:
4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

**Emergency Solutions Grant (ESG)  
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.
3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.
5. Describe performance standards for evaluating ESG.

**Appendix - Alternate/Local Data Sources**

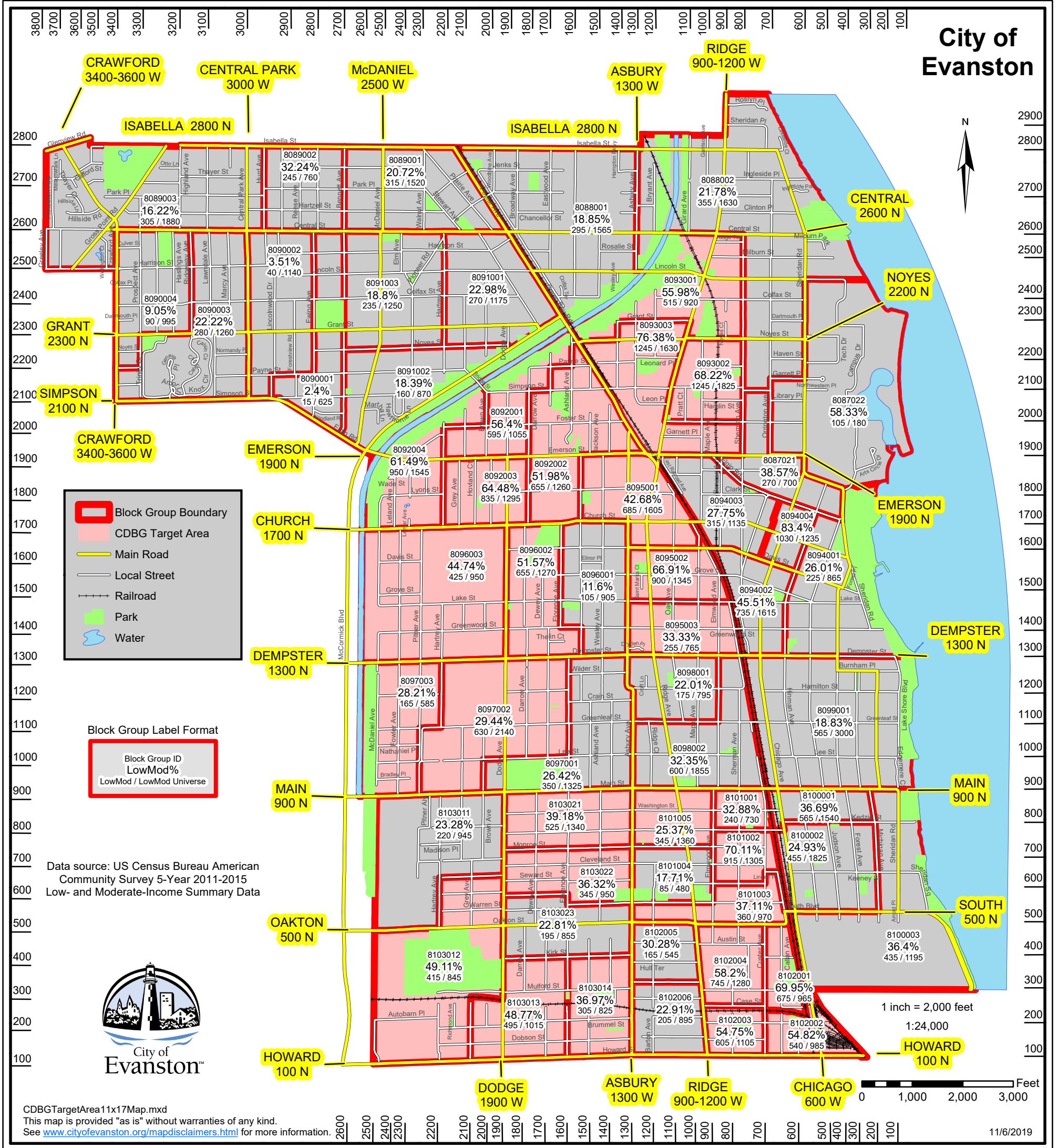
<b>1</b>	<p><b>Data Source Name</b> Evanston Health Department; Vacant Buildings</p> <hr/> <p><b>List the name of the organization or individual who originated the data set.</b> City of Evanston Health Department</p> <hr/> <p><b>Provide a brief summary of the data set.</b> 2014 data on the number of vacant residential properties in Evanston and the number of those slated for demolition.</p> <hr/> <p><b>What was the purpose for developing this data set?</b> To determine the number and condition of vacant residential properties.</p> <hr/> <p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Data is for the entire City of Evanston.</p> <hr/> <p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> Year covered is 2014.</p> <hr/> <p><b>What is the status of the data set (complete, in progress, or planned)?</b> The number and condition of vacant properties is continuously changing.</p>
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<b>2</b>	<b>Data Source Name</b> Point In Time Count 2018
	<b>List the name of the organization or individual who originated the data set.</b> Alliance to End Homelessness in Suburban Cook County Continuum of Care
	<b>Provide a brief summary of the data set.</b> Point in Time Count for all of suburban Cook County
	<b>What was the purpose for developing this data set?</b> To determine the nature of homelessness in suburban Cook County among the various homeless populations.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> The data is for all of suburban Cook County covered by the Continuum of Care. The data pertains to the homeless population.
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 1/23/2013
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete
<b>3</b>	<b>Data Source Name</b> Housing Authority of Cook County (Evanston Data)
	<b>List the name of the organization or individual who originated the data set.</b> Housing Authority of Cook County (HACC)
	<b>Provide a brief summary of the data set.</b> Jurisdiction specific (Evanston) data pertaining to public housing vouchers, wait list, demographics of residents, and units in Evanston.
	<b>What was the purpose for developing this data set?</b> To determine the use of public and assisted housing in the City of Evanston.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> The data is from the HACC and is specific to the City of Evanston's public housing units and voucher holders .
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> Data is up to date as of August 2014.

	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
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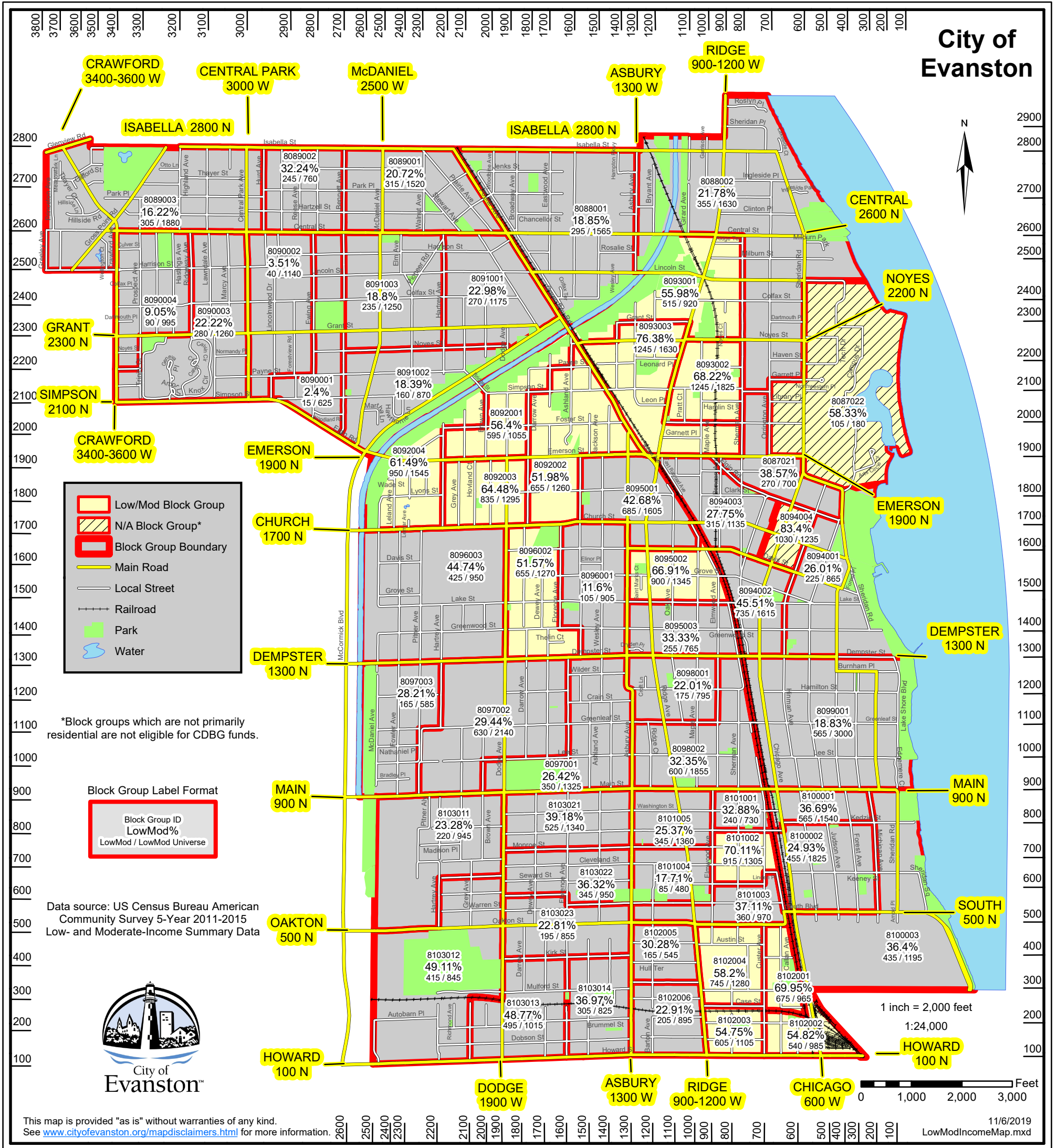
# CDBG Target Area

City of Evanston

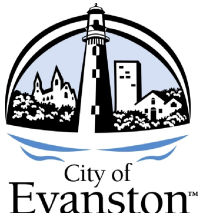




# Low/Moderate Income Census Block Groups



\*Block groups which are not primarily residential are not eligible for CDBG funds.



**City of Evanston  
Community Development Block  
Grant Program  
Prior Year Unexpended Funds  
For Reallocation in 2020**

<b>Program Year</b>	<b>Project</b>	<b>Amount</b>
2018	CDBG Administration	\$ 68,222
	<b>Total</b>	<b>\$ 68,222</b>

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

  
\_\_\_\_\_  
Signature of Authorized Official

4-16-20  
Date

Interim City Manager  
\_\_\_\_\_  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019, 2020, and 2021 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
\_\_\_\_\_  
Signature of Authorized Official

4-16-20  
Date

Interim City Manager  
Title

**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



\_\_\_\_\_  
Signature of Authorized Official

4-16-20

\_\_\_\_\_  
Date

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Interim City Manager

Title

## **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.



\_\_\_\_\_  
Signature of Authorized Official

4-16-20

\_\_\_\_\_  
Date

Interim City Manager

Title



## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

