

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING IN THE DU PAGE COUNTY AREA

December, 2009

INTRODUCTION & EXECUTIVE SUMMARY

Since 1983, as part of DuPage County's requests for Community Development Block Grant (CDBG) funds, it has certified that it will "affirmatively further fair housing." This fair housing certification refers to Public Law 90-284 known as the Fair Housing Act, which "prohibits any person from discriminating in the sale or rental of housing, the financing of housing, or the provision of brokerage services, including otherwise making unavailable or denying a dwelling to any person, because of race, color, religion, sex, national origin, handicap, or familial status." The first Consolidated Plan for Housing and Community Development was completed in 1995 and also required this certification. This certification was further expanded to state that the County will conduct an analysis of impediments to fair housing, take appropriate action, and report on these actions.

The Fair Housing Planning Process

The three-part approach to affirmatively furthering fair housing is referred to as "fair housing planning." The three parts are described as follows, with this analysis representing the first part of that effort:

Conducting an analysis to identify impediments to fair housing choice within DuPage County This analysis is contained within this document. This document's three sections include: (a) a general profile of the region and the county with data and trends that are related to fair housing issues; (b) a fair housing profile presenting information on public and private sector fair housing activities and summarizing fair housing complaints and allegations; and (c) summary statements of fair housing impediments.

Taking actions to eliminate identified impediments After completion of the analysis of impediments, the next step in the planning process is to undertake activities that will address the identified problems. Some of these actions will be existing activities, but it is likely that new activities will need to be designed and implemented. This document contains an action grid summarizing the impediments and actions that will address them.

Maintaining records about the analysis and actions taken The third part of the fair housing planning process is to maintain records about the actions that are undertaken, and, to the extent possible, to evaluate the results. These records will consist of file documentation, but will also be summarized on the action grid on an on-going basis.

Definition of Fair Housing Impediments

Impediments to fair housing choice are defined in two different ways, which we will refer to as "direct" and "indirect." Information about both types of impediments described above is included in this analysis of impediments.

Direct impediments These impediments are those that are commonly known as discriminatory and would include any actions, omissions, or decisions taken because of race, color, religion, sex, sexual orientation, disability, familial status or national origin that restrict housing choices or the availability of housing choice. Such actions would include:

1. Refusing to sell or rent to, or deal or negotiate with any person.
2. Discriminating in the terms or conditions for buying or renting housing.
3. Discriminating by advertising that housing is available only to certain persons.
4. Denying that housing is available for inspection, sale, or rent when it is really available.
5. "Blockbusting" for profit, i.e., persuading owners to sell or rent housing by telling them that minority groups are moving into the neighborhood.
6. Denying or making different terms or conditions for home loans by commercial lenders such as banks, savings and loan associations, or insurance companies.
7. Denying to anyone the use of or participation in any real estate services, such as brokers, organizations, multiple listing services, or other facilities relating to the selling or renting of housing.
8. Failure to make reasonable accommodation for accessibility of new or rehabilitated housing to persons with disabilities, or denying persons with disabilities permission to make modifications to existing housing to accommodate his or her disability.

While some of the actions described above seem like they would be easy to detect, some of the specific behaviors involved may be difficult to spot. For example, a person who has been a victim of discrimination may be unaware that they have not been given information on all the housing that would be in their price range, and could, therefore, be steered to certain communities or neighborhoods. Appraisals on property in certain minority areas could be reduced thereby reducing the availability of financing, and it may be the case that racial steering has limited demand, which will depress values. In advertising, consistent failure to include minority persons in printed materials, or otherwise avoid advertising to minority persons, requires more than casual observation to detect.

Indirect impediments Any other actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choice would fall into this category. An example of this type of impediment would be policies that could create shortages of affordable housing when persons from certain racial or ethnic groups are more likely to have lower incomes and be in need of affordable housing. Policies that could have this effect may include comprehensive plans, zoning ordinances, subdivision regulations, building codes, occupancy codes or other local regulations. They may also include regulations and policies that are federally or state generated (such as environmental regulations) that can add costs.

The problem in examining these regulations and policies is that their primary purpose is to create livable communities and to protect people and businesses from adverse impacts such as traffic, flooding, health and safety hazards, overcrowding and other concerns. The fact that they may also add to housing costs, and consequently limit housing choice for some individuals, is an indirect impact.

Process for Completing this Analysis of Impediments

This analysis of impediments was prepared by the staff of the DuPage County Community Development Division and was funded, in part, with Community Development Block Grant funds. Sources of the information in the report include several regional and county documents that describe fair housing and affordable housing issues. As information is presented, the sources are described.

I. DESCRIPTION OF THE DU PAGE COUNTY AREA

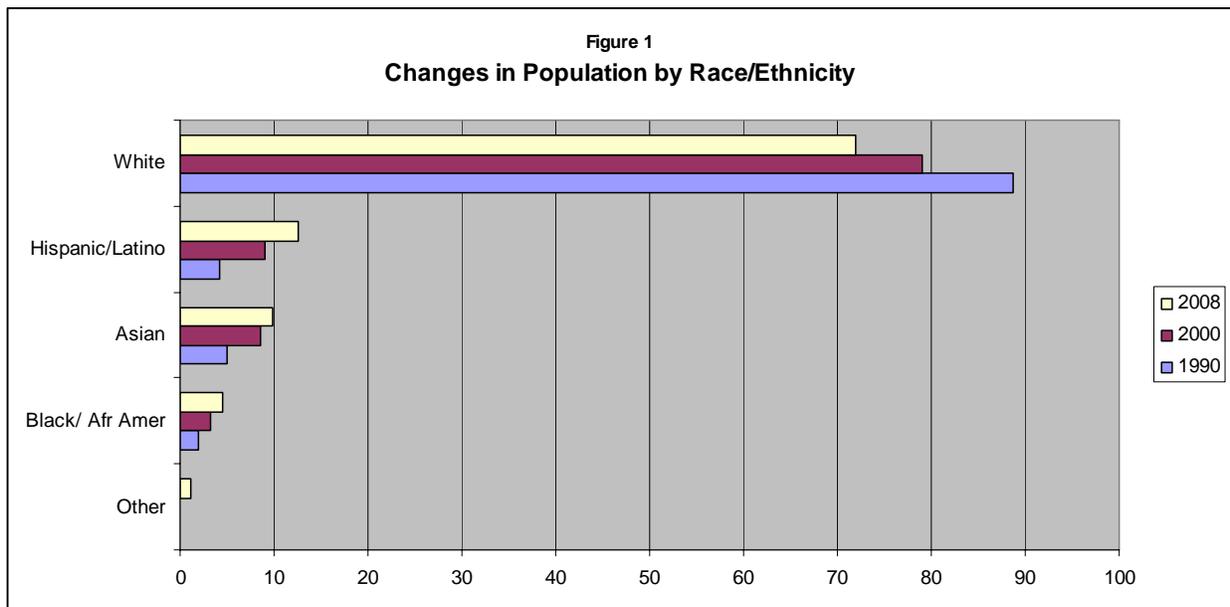
I.A REGIONAL PROFILE

The 2000 Census showed that, from 1990 to 2000, the population of the DuPage County increased by 122,495 persons (15.7%) to a total of 904,161. The 2008 American Community Survey estimates the DuPage County population at 927,410. The DuPage Federation on Human Services Reform, which is a collaboration of government and key community organizations and is affiliated with the Northern Illinois University's Center for Governmental Studies, produced a "Community Profile for DuPage County" in July, 2009. Based on Census Data and other available data, they have identified the following demographic trends:

1. More African American and Latino individuals and families are migrating to the western suburbs. While DuPage County is experiencing a growth in African American population, Cook County and the City of Chicago are experiencing a steady decline. Areas of high growth in the African American population are Naperville, York, Milton and Bloomingdale Townships. The Hispanic/Latino population continues to grow in Winfield and Addison Townships and is showing new signs of growth in Naperville and Bloomingdale Townships.

2. Immigrant population growth in DuPage County is rapidly outpacing Illinois, Cook County, and the City of Chicago. Between 2000 and 2006, DuPage County's immigrant population shifted by 3.1 points, while Chicago's population remained stagnant and Illinois and Cook County each experienced no more than a 1.4 point increase. Addison and Bloomingdale Townships have the highest proportion of foreign born residents, but Wayne and Naperville Townships experienced the most rapid growth in immigrant residents.

I.A.1 Changes in the Population Racial and Ethnic Characteristics



According to 2000 Census Bureau figures, DuPage County's population grew by nearly 16 percent from 1990 to 2000. The Census Bureau's revised race/ethnicity reporting criteria for 2000 mandated the distinction between Hispanic ethnicity and race. Based on a comparison with 1990 figures, calculated by Fannie Mae Foundation and bridged to accommodate this change, the County experienced significant growth in its Hispanic population. (This indicator is a special calculation completed for the Neighborhood Change Database that allocated multiracial population to single-race categories to enable comparisons with 1990 statistics. Census 2000 included the following basic race categories: White, Black or African America, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific islander, and some other race. Census 2000 was the first decennial census allowing respondents to select more than one race. Census 2000 also differed from the 1990 Census in the sequence of the race and Hispanic origin questions. Source: Fannie Mae Foundation, Knowledgeplex.) Countywide, using the bridged numbers, the Hispanic population more than doubled, increasing by 48,260 persons, which is a 147 percent increase from 1990. The Black population grew by 13,886 persons, a 92 percent increase, while the Asian population increased by 95 percent to 76,904. The County's White population experienced an increase of 3 percent. The 2008 figures were compiled by the DuPage County Planning Department. Figure 1 shows the changes in regional population between 1990, 2000, and 2008.

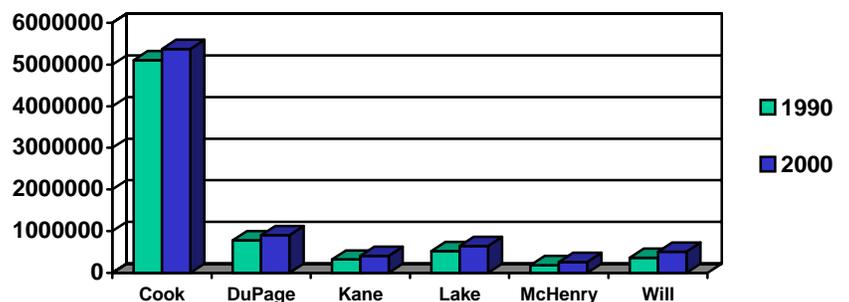
I.A.2 Changes in Geographic Distribution of Population

There were also some significant changes in the distribution of the population throughout the 6-county Northeastern Illinois region, comprised of Cook, DuPage, Kane, Lake, McHenry and Will Counties. Overall the region's population grew by 830,544 or 11.4 percent. During this decade there was a continuing shift of population from city to suburb. However, in a reversal of the downward trend from 1950 to 1990, the City of Chicago saw an increase in population of 112,290 (a 4% increase) and Cook County grew by 5.3 percent. The remaining counties' rate of growth far surpassed the overall state increase of 8.6 percent and national rate of 13.2 percent. Table 1 shows McHenry County experienced the greatest increase at 42 percent, with Will at 41 percent, Kane at 27 percent and Lake at 25 percent. Dupage increased by 16%. Figure 2 charts this data.

Table 1.

Population Growth by County 1990 - 2000	
McHenry	42%
Will	41%
Kane	27%
Lake	25%
DuPage	16%
Cook	5%

Figure 2. Population Growth



1990-2000 Census - Chicago PMSA

Inherent in this overall increase is more racial diversity region-wide. In 1990, 12 percent of the region's population was Latino. By 2000, the Latino population had grown to 17 percent.

Further analysis of changes in geographic distribution of population will be conducted when the 2010 census data is released.

I.A.3 Measures of Integration in the Region

A regional factor that affects DuPage is the history of integration in the Chicago region. One of the tools used by the Census Bureau to measure integration and racial diversity is the Diversity Index. The

County	Change 1990-2000	2000 Diversity Index
Cook	0.08	0.66
DuPage	0.15	0.36
Kane	0.13	0.48
Lake	0.14	0.44
McHenry	0.11	0.19
Will	0.07	0.38

Source: U.S. Census Bureau

Diversity Index reports the percentage of times two randomly selected people would differ by race/ethnicity within a certain geographic area. On a 100-point scale, a score of 0 would indicate total integration, and a score of 100 would indicate total segregation. By this measurement DuPage County (see Table 2), scored a diversity index of .36, an increase of .15 from the 1990 Census. By comparison, the national diversity rate is .49. Further analysis of measures of integration will be conducted when the 2010 census data is released.

I.B DU PAGE COUNTY PROFILE

DuPage County is located in northeastern Illinois, 20 miles west of the City of Chicago. It is one of five Illinois counties, including DuPage, Kane, Lake, McHenry, and Will, that surround Cook County. Of these counties, DuPage has the smallest land area (332 square miles). One of the reasons for DuPage County's continued growth is that it is considered a desirable place to live because of its proximity to jobs, new housing, recreational amenities, and educational opportunities.

I.B.1 Population Characteristics

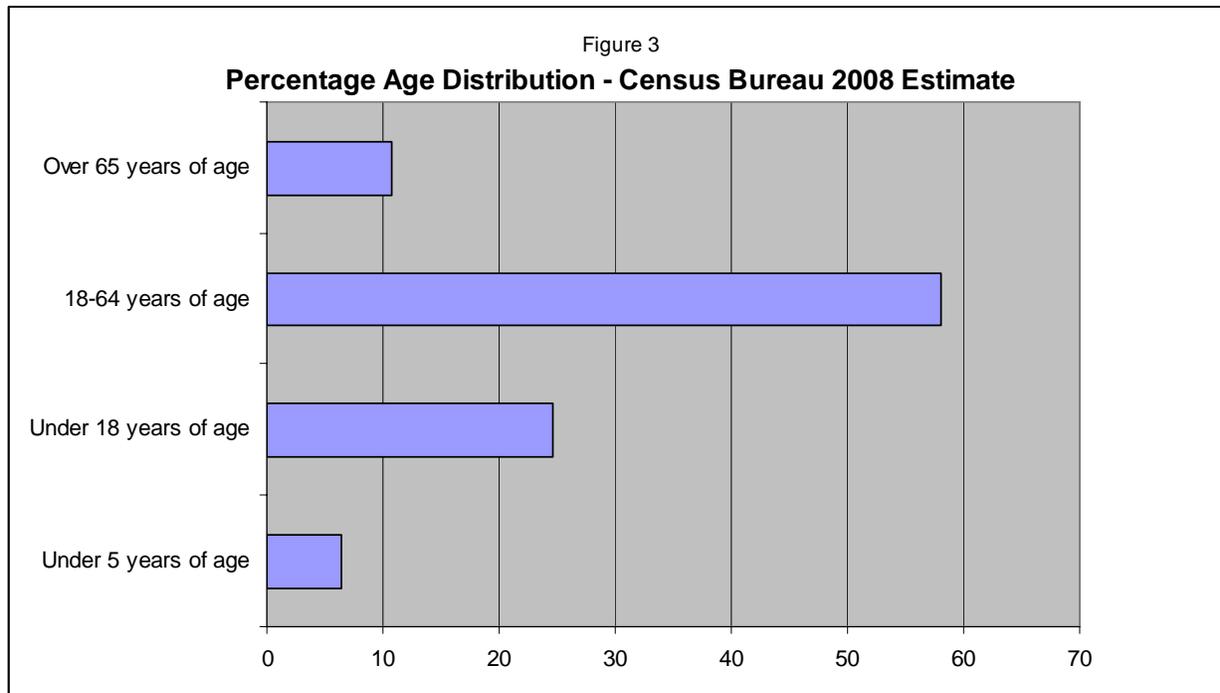
The population characteristics described in this section are for the DuPage County "Consortium" area as it was in 2008. This area included all of DuPage County plus the portions of Aurora and Naperville that are outside of DuPage in Kane and Will Counties. Beginning in 2009, the City of Aurora has withdrawn from the Consortium. There are three general population trends that are related to fair housing issues in this area. First is the anticipated rapid population growth in the area (Table 3), second is the problem of differing rates of growth in age groups (in particular, the fast growth of the aging population), and third is the changing racial and ethnic make-up of the area.

Population growth in the consortium had been slowing in the later part of the twentieth century, however, the rate remains strong in comparison to the rest of the Chicago metropolitan region. In the 1970s, about 17,000 persons were added to the DuPage County population each year. In the 1980s, this growth had slowed to about 12,000 per year, a rate maintained through this 1990s. It is projected that between now and 2030, about 3,000 persons will be added each year.

Area Name	Population		Households		Employment	
	2000	2030	2000	2030	2000	2030
Northeastern Illinois	8,091,720	10,034,835	2,906,925	3,627,752	4,323,207	5,563,934
County						
Cook	5,376,741	5,938,248	1,974,181	2,224,929	2,841,941	3,318,234
DuPage	904,161	1,002,325	325,601	361,978	646,610	830,394
Kane	404,119	692,346	133,901	234,617	206,107	342,684
Lake	644,358	844,315	216,297	292,253	354,114	461,487
McHenry	260,077	449,823	89,403	155,108	105,118	167,765
Will	502,266	1,107,778	167,542	358,867	169,317	443,370

Source: Northern Illinois Planning Commission

The age distribution of the Consortium's population provides indicators of such factors as the size of the labor force, rate of new household formations and the varying needs of different age groups. Figure 3 illustrates the age distribution of DuPage County residents.



Besides the overall growth of the minority population in the DuPage area, it is also important to examine the income distribution of the minority population. This information shows the degree to which housing affordability will limit the housing choices of minority households.

In fact, previous data shows that minority populations have disproportionate numbers of low-income persons. Table 4 provides information about income distribution by race. In particular, this graph shows the percent of each of these groups at graduated income levels. Collectively and countywide, 2000 Census figures show a 54 percent increase in the number of persons living below the poverty rate. In 2000, 3.6 percent of the County's population was living in poverty, an increase over the 2.7 percent in 1990 (Table 5). The DuPage Federation on Human Services Reform has compiled data to suggest that poverty is on the rise in DuPage County and that the number of people living below poverty more than doubled between 1990 and 2006. Their data suggests that Addison Township has the

Table 4. Distribution of on of Income by Families and Race/Nationality, Census 2000

	%White	%Black	%Hispanic
<i>Less than \$10,000</i>	4.0	11.7	8.4
<i>\$10,000 - \$14,999</i>	4.0	8.3	7.9
<i>\$15,000-24,999</i>	10.7	16.8	18.3
<i>\$25,000-34,999</i>	11.8	14.1	15.4
<i>\$35,000-49,999</i>	15.9	16.8	18.1
<i>\$50,000-74,999</i>	22.2	16.7	17.9
<i>\$75,000+</i>	31.4	15.6	14.1
Total Families	60,222,000	8,814,000	7,728,000

Source: U.S. Census Bureau, Statistical Abstract of the United States: 2000, <http://www.census.gov/prod/2003pubs/02statab/pop.pdf>

highest percentage of residents living below poverty. Further analysis of poverty data will be conducted when the 2010 census data is available. Please note that the median household income in DuPage County for 2009 was \$74,900, measured before the economic downturn and widespread unemployment which ensued in 2009.

	1990	2000
Median household money income	\$48,876	\$67,887
Persons below poverty, number	20,948	32,163
Persons below poverty, percent	2.7%	3.6%
Children below poverty, number	6,036	9,818
Children below poverty, percent	2.9%	4.1%

I.B.2 Employment and Transportation

While the County experienced significant population growth in the 1990s, the percentage increase in employment was over three times as great as the percentage increase in population. Between 1990 and 2000, the number of employees within the County grew from 468,012 to 642,936 for an increase of approximately 37 percent. The DuPage County Planning Department reports that according to a Bureau of Economic Analysis in 2007, there are 740,149 jobs in DuPage County. According to the 2000 Census Data, there are 256,000 residents of other counties who commute into DuPage County to work and 191,000 DuPage residents who work in other counties.

In 2007 there were 34,071 business establishments in DuPage County.

Northeastern Illinois Planning Commission and Illinois Department of Employment Security census-based projections indicate that approximately 6,000 new jobs become will be available in DuPage County annually through 2030. Of those positions, approximately two-thirds will be in the service sector, which are traditionally low-wage positions and insufficient for narrowing the affordability gap.

The overwhelming mode of travel in DuPage is the private automobile. Nearly 88 percent of all DuPage workers relied on the private automobile to go to work in 2000, which includes those who drive alone as well as carpooling commuters.

Despite the obvious dominance of the private auto in work-trip mode selection, public transportation provides indispensable service to a good segment of the County's residents. Over 31,612 passengers board the three commuter rail lines each day. These rail lines run east/west connecting DuPage County to the City of Chicago.

I.B.3 Housing Profile

Category	Total	Vacancy Rate
Total Housing Units	358,282	n/a
Total Occupied Units	338,050	n/a
Renter	78,198	n/a
Owner	259,852	n/a
Total Vacant Units	20,232	n/a
Renter		7.0%
Owner		2.3%

Source: U.S. Census 2006-2008 American Community Survey

Table 6 summarizes the housing stock in the DuPage Consortium area, based on the Census Bureau's 2006-2008 American Community Survey, which reports a total of 358,282 housing units in the area of which 338,050 (or 94.35%) are occupied. The vacancy rates for both renter and owner units have risen over the last five years. Regarding units for which tenure status is known, the vacancy rate for rental units is far greater than for owner units.

DuPage County continues to have strong homeownership, with approximately 76.9% of housing units owner-occupied and 23.1% renter-occupied.

Due to the instability of the current housing market, the costs of housing continue to rise and fall, making it difficult to accurately pinpoint the current costs of housing. Various sources have reported the current costs as follows:

U.S. Census Bureau: The 2006-2008 U.S. Census Bureau American Community Survey estimates the median value for owner-occupied units in DuPage County to be \$327,000 and the median rent to be \$998. The data on value of owner occupied units was obtained from Housing Question 16 in the 2008 American Community Survey, which was a write-in box to answer the question, "About how much do you think this house and lot, apartment, or mobile home (and lot, if owned) would sell for if it were for sale?"

The U.S. Census Bureau defines contract rent for renter occupied housing as the monthly rent agreed to or contracted for, regardless of any furnishings, utilities, fees, meals, or services that may be included. It is important to recognize that rent levels examined herein are not compared to size, quality and availability of housing units.

Under U.S. Census Bureau definitions, contract rents are a more direct reflection of actual housing costs than are values of owner housing because values are dependent on the perception of the owner as reported to the Census. Translating values to monthly costs will also vary according to mortgage amounts and rates, taxes, utilities, and other expenses. Rents are more direct, but can still vary depending on size, utility costs, etc.

Realty Information Services: Because realty information services can update data more quickly than the U.S. Census Bureau, due to the volatility of the housing market, it is helpful to check this data. On October 28, 2009, RealtyTrac estimated the DuPage County median home value to be \$245,531; realtor.com estimated it to be \$279,900 on the same date. In September, 2009, Main Street Organization of Realtors, the board of realtors for DuPage County, estimated the median house sale price to be \$290,000. On December 14, 2009, hotpads.com, a real estate search engine for rental property, estimated the median DuPage rent to be \$1,081.

Housing Costs Methodology: Figure 5-4 compares current housing costs to those reported in the last Consolidated Plan. Taking an average of the various data sources gives an estimated median home value for owner occupied property of \$285,600. Although this is an approximately 46% increase over the cost reported in the 2005-2009 Consolidated Plan, the data in the prior Consolidated Plan was taken from the 2000 Census. Further, housing prices have dropped significantly since 2007. Median family income must also be factored into affordability. The 2009 median family income in DuPage County was \$74,900, only a 6% increase since the 2005 median family income of \$70,560. The DuPage Homeownership Center publishes an annual "affordability index." A perfect index would be 100, which would mean median-income families would spend at most 30% of their monthly income on housing costs. The 2009 "affordability index" is 84%, which puts owner occupied housing out of reach for 16% of DuPage County residents. This is an improvement, however, over the 2008 index of 65. For rental housing costs, an average of the two data sources gives an estimated median rent of \$1039.

According to the National Low Income Housing Coalition, the maximum affordable monthly housing costs for a household at 50% median family income in DuPage County is \$936. The DuPage County fair market rent for a two bedroom apartment is \$1,004 and the overall median rent is \$1,081. This means that rental housing is out of reach for households at 50% MFI. A minimum wage worker earning \$7.75 per hour would need to work 89 hours per week, 52 weeks per year to afford the fair market rent on a two bedroom apartment.

In DuPage County, the needed hourly wage to afford rental housing is as follows:

0 Bedroom	\$15.02
1 Bedroom	\$17.19
2 Bedroom	\$19.31
3 Bedroom	\$23.60
4 Bedroom	\$26.67

Housing Affordability by Municipality

Table 7 was prepared by Illinois Housing Development Authority (IHDA), based on 2000 Census Data, in conjunction the passage of the Illinois Affordable Housing Planning and Appeal Act (AHPAA) (Public Act 93-595, as amended by Public Act 93-678) that went into effect on January 1, 2004.

32,334

Table 7.	Affordable Sales Price	# Affordable Ownership Units	Affordable Monthly Rent	# Affordable Rental Units	Total # Affordable Units	Total # Units	% Affordable Units	Total Pop.
Oak Brook	\$122,381	44	\$775	5	49	3,054	1.60%	8,702
Wayne	\$122,876	3	\$775	11	14	703	1.99%	2,137
Burr Ridge	\$123,385	87	\$775	14	101	3,485	2.90%	10,408
Hinsdale	\$122,710	112	\$775	399	511	6,102	8.37%	17,349
Oakbrook Ter.	\$122,381	38	\$775	78	116	1,314	8.83%	2,300
Naperville	\$122,712	2,299	\$775	1,921	4,220	44,832	9.41%	128,358
Winfield	\$122,381	263	\$775	22	285	2,958	9.63%	8,718
Clarendon Hills	\$122,381	31	\$775	357	388	2,925	13.26%	7,610
Elmhurst	\$122,381	1,012	\$775	1,170	2,182	15,835	13.78%	42,762
Darien	\$122,381	601	\$775	630	1,231	8,733	14.10%	22,860
Bartlett	\$123,383	1,257	\$775	493	1,750	12,324	14.20%	36,706
Itasca	\$122,381	262	\$775	209	471	3,169	14.86%	8,302
Roselle	\$122,875	826	\$775	444	1,270	8,467	15.00%	23,115
Bloomington	\$122,381	852	\$775	526	1,378	8,291	16.62%	21,675
Wheaton	\$122,381	1,535	\$775	1,753	3,288	19,544	16.82%	55,416
Unincp. DuPage	\$122,381	4,449	\$775	2,079	6,528	37,994	17.18%	104,075
Wood Dale	\$122,381	669	\$775	304	973	5,210	18.68%	13,535
Lisle	\$122,381	581	\$775	1,157	1,738	8,777	19.80%	21,182
Lombard	\$122,381	2,199	\$775	1,183	3,382	16,619	20.35%	42,322
Glen Ellyn	\$122,381	907	\$775	1,271	2,178	10,218	21.32%	26,999
Downers Grove	\$122,381	2,105	\$775	2,073	4,178	19,082	21.89%	48,724
Carol Stream	\$122,381	1,594	\$775	1,760	3,354	14,053	23.87%	40,438
Villa Park	\$122,381	728	\$775	1,178	1,906	7,846	24.29%	22,075
Willowbrook	\$122,381	881	\$775	199	1,080	4,370	24.71%	8,967
Warrenville	\$122,381	1,168	\$775	191	1,359	4,944	27.49%	13,363
West Chicago	\$122,381	907	\$775	1,099	2,006	6,691	29.98%	23,469
Addison	\$122,381	1,069	\$775	2,730	3,799	11,598	32.76%	35,914
Bensenville	\$122,381	879	\$775	1,442	2,321	7,024	33.04%	20,703
Glendale Hts.	\$122,381	2,327	\$775	1,297	3,624	10,914	33.21%	31,765

Woodridge	\$122,381	1,727	\$775	2,108	3,835	11,476	33.42%	30,934
Westmont	\$122,381	1,022	\$775	2,595	3,617	10,035	36.04%	24,554

The law was intended to encourage municipalities and counties to incorporate affordable housing into their communities. It requires all counties and municipalities with insufficient affordable housing, as defined by this law, to adopt an affordable housing plan. Local governments with sufficient affordable housing, set by the statute as 10% or more of total year-round housing units, are exempt, as are municipalities under 1,000 in population. The Act also states that affordable housing developers who are denied permits by communities with insufficient affordable housing or receive approvals with infeasible conditions, may appeal local decisions to a State Housing Appeals Board, which was to be activated in January of 2009. The State Housing Appeals Board has not yet been activated and the Governor is still in the process of appointing members. In the interim period, no appeals were received by IHDA.

IHDA was named the administering agency for the law and published the first of an annual list of exempt and non-exempt local governments under the law. This list defines non-exempt local governments as those with insufficient affordable housing, which are required to adopt affordable housing plans. At a minimum, the plan must include:

- a statement of the total number of affordable housing units that are necessary to exempt the local government from the operation of this Act;
- an identification of lands within the jurisdiction that are most appropriate for the construction of affordable housing and of existing structures most appropriate for conversion to, or rehabilitation for, affordable housing, including a consideration of lands and structures of developers who have expressed a commitment to provide affordable housing and lands and structures that are publicly or semi-publicly owned; incentives that local governments may provide for the purpose of attracting affordable housing to their jurisdiction; and
- a goal of: a minimum of 15% of all new development or redevelopment within the local government that would be defined as affordable housing in this Act; or a minimum of a 3 percentage point increase in the overall percentage of affordable housing within its jurisdiction, as defined in Section 20 of the Act; or a minimum of a total of 10% of affordable housing within its jurisdiction.

The law was further amended in 2005 to provide some tools to municipalities, such as the ability to share affordable units across boundaries and the use of land trusts. Additionally, IHDA has amended its tax credit application process to give extra points for affordable housing development in the non-exempt communities, and those with 10-20% affordable units that may be at risk of becoming non-exempt.

Table 8 identifies the DuPage County Municipalities which were required to adopt a plan and whether they are currently compliant.

Table 8
DuPage County Municipalities Required to Adopt a Plan

Plan Filed	Municipality	For Sale Units		Rental Units		Total Affordable Units		
		Affordable sales price	Affordable ownership units	Affordable monthly rent	Affordable rental units	Total affordable units	Total units	% of affordable units
Yes	Burr Ridge	\$123,385	87	\$775	14	101	3,485	2.90%
Yes	Hinsdale	\$122,710	112	\$775	399	511	6,102	8.40%
No	Naperville	\$122,712	2,299	\$775	1,921	4,200	44,832	9.40%
No	Oak Brook	\$122,381	44	\$775	5	49	3,054	1.60%
No	Oakbrook Terrace	\$122,381	38	\$775	78	116	1,314	8.80%
Yes	Wayne	\$122,876	3	\$775	11	14	703	2.00%
No	Winfield	\$122,381	263	\$775	22	285	2,958	9.60%

Source: IHDA

One contention of municipalities has been that the non-exempt status is based on 2000 Census Data and that updated census data will show that they are exempt. DuPage County will be working with the non-compliant communities to bring them into compliance during the period of this Consolidated Plan, particularly as new census data is made available.

I.B.4 Availability of Housing Services

The Consolidated Plan lists the organizations that provide services in the DuPage consortium area. These organizations are located throughout the area and serve many types of needs including homeless shelter, counseling, fair housing services, housing information and referral, provision of special needs housing, affordable housing, and other needs. The only organizations providing fair housing services are the HOPE Fair Housing Center and the DuPage Department of Community Services. The extent of their activities is reported in the fair housing profile section of this document.

II. DUPAGE COUNTY'S FAIR HOUSING PROFILE

This section includes information about fair housing activities that are taking place in DuPage including both public and private actions. In addition, as an indicator of problems that exist in the County, we have summarized information about fair housing complaints in the DuPage area.

II.A FAIR HOUSING ACTIVITIES OF PUBLIC AND PRIVATE AGENCIES

II.A.1 Municipal Activities

In 1992, a survey was taken of DuPage municipalities to learn more about their housing activities. Municipalities were asked if they had updated their zoning ordinances to reflect the federal law permitting group homes in residential districts, if they had revised their building code to reflect the ADA accessibility guidelines, if they had a human rights commission, a fair housing ordinance, or if they sponsored any other housing activities. The survey also asked if the municipality had received any housing discrimination complaints and, if so, how they were handled.

Twenty of the 35 DuPage municipalities responded, and more than half of these had adapted, or were in the process of revising, their zoning ordinance to permit group homes in compliance with the 1988 Fair Housing Act. Most municipalities responding had revised their building code to comply with the handicap accessibility standards of the Americans with Disabilities Act. Those municipalities that had not adapted to the standards set in the ADA were following the Illinois Accessibility Standards and the Environmental Barriers Act, which match or in some cases may exceed the standards set in the ADA.

Most municipalities do not have a fair housing ordinance, however, the village of Bensenville, the Village of Carol Stream, the Village of Glen Ellyn, and the City of Wheaton do. A Human Rights Commission to handle local fair housing complaints is a typical feature of a fair housing ordinance, but no municipality reported having an active Human Rights Commission.

The Housing Resource Unit of the DuPage County Department of Community Services also fields fair housing complaints and refers them to HOPE Fair Housing Center. The Housing Resources Unit provides an education program on Fair Housing Law to apartment managers and owners and distributes written materials and public information, including Illinois Statute Chapter 80 regarding Tenant and Landlord, Illinois Statute Chapter 68 on Human Rights, Federal Register with pages containing Fair Housing Amendment Act, Discriminatory Housing Practice, Synopsis of the 1988 Fair Housing Amendment Act, and the Americans with Disabilities Act of 1991.

The DuPage Community Development Commission (CDC) requires DuPage communities, which apply for Community Development Block Grant funds to have a Fair Housing Action Plan on file. Fair Housing Action Plans may, but need not, include a fair housing ordinance, creation of a human rights commission, and provision of education programs on fair housing, outreach to minority groups, support for fair housing groups, and general promotion of leadership in fair housing. The CDC also requires a certification from each municipality receiving funds that its zoning ordinance is in compliance with the Fair Housing Amendments Act of 1988. Table 9 lists municipalities that have supplied fair housing action plans to the CDC.

Table 9. Municipalities Submitting Fair Housing Action Plans to the DuPage Community Development Commission*	
Village of Addison	Village of Villa Park
Village of Bensenville	Village of Warrenville
Village of Carol Stream	City of West Chicago
Village of Glen Ellyn	City of Westmont
Village of Glendale Heights	City of Wheaton
Village of Lombard	Village of Woodridge
Village of Villa Park	

* DuPage County has also submitted an action plan to the committee

An action goal of this analysis will be to update our municipal surveys regarding zoning ordinances and fair housing.

II.A.3 Activities of the DuPage Housing Authority

The DuPage Housing Authority (DHA), as part of its Administrative Plan, has a Fair Housing Practices policy. This policy first states the DHA's commitment to nondiscrimination and equal housing opportunity. However, the policy goes on to establish procedures for supplying information to families receiving rental assistance under the Housing Choice Voucher (HCV) program. The information provided outlines the household's rights under fair housing law and provides each household with complaint forms to use if they feel they have been the victims of discrimination. The DHA also supplies information on available housing to encourage a wider range of location choices for its clients. This is in accordance with HUD's "open housing" policy.

The DHA maintains an Equal Opportunity Housing Plan, which has five primary objectives.

Objective I - Outreach to Low Income and Minority Families The DHA sends press releases to media organizations, legislators, townships, municipalities, housing centers, social service agencies, churches, and other organizations in the DuPage County area.

Objective II - Housing Opportunities for Low Income Families and Dispersal of Subsidized Units The DHA encourages tenants to consider all parts of the county as they select a unit. The Authority also promotes the HCV program to landlords in order to increase the number of apartment owners that will accept vouchers, and participates with housing authorities in other parts of the region.

Objective III - Ensuring Equal Opportunity to Applicants for Participation in the DHA's Program and in the Selection of Voucher Holders The Authority maintains strict guidelines in the processing of applicants so that each has an equal opportunity to participate, subject to the published preferences of the program.

Objective IV - Provision of Services and Assistance to Families That Allege They Have Encountered Discrimination During Their Housing Search The DHA staff provides referral assistance

to families that allege discrimination preventing them from finding suitable housing. The family is referred to the HOPE Fair Housing Center or HUD's Office of Fair Housing.

Objective V - Promoting Employment Opportunities in the DHA Hiring and promotion is done in a non-discriminatory manner.

II.A.4 Activities of Private Agencies

HOPE Fair Housing Center

Under its contract with the County, HOPE Fair Housing Center conducts a variety of activities, including:

- Home sales and rental testing for discrimination based on race, national origin, children or disability;
- Investigation and testing of property owners and managers who rent to Latino and immigrant populations but lease them different and substandard housing as compared to the housing rented to other populations;
- Assistance for tenants with disabilities who require reasonable accommodations or modifications;
- Providing support to Code Enforcement Inspectors and other municipal employees; and
- Fair housing education and outreach with and for other non-profit organizations, governmental agencies and consumers.

a. Training HOPE conducts voluntary training, education and testing programs at the request of municipalities, lending institutions, real estate brokers, and housing providers. HOPE has produced videos on mortgage lending discrimination and is currently producing two others for the National Fair Housing Alliance and Fannie Mae. HOPE uses the videos on a local and national level to help make lenders and housing providers more sensitive to issues of housing related discrimination.

b. HOPE Newsletter HOPE's newsletter, which is widely distributed throughout the Chicago metropolitan area and in some other areas of the country, provides up to date information on fair housing issues. It is mailed to DuPage County mayors and managers and attempts to make them aware of informational and educational programs that are available to them.

c. DuPage Housing Authority HOPE assists the DuPage Housing Authority in training its staff on fair housing issues. In addition, HOPE produced two video presentations for clients of the housing authority so that they understand how to most effectively obtain housing using housing assistance vouchers.

d. Other outreach activities. In 2009, HOPE launched an updated website to give clients more and better information regarding their fair housing rights and how HOPE might assist them through testing, investigation and complaint filing. HOPE has also launched a book mark campaign through the distribution of 60,000 book marks that give fair housing information in a very eye-catching way. The bookmarks are also distributed through: DuPage Homeownership Center, DuPage Housing Authority, Peoples Resource Center, Catholic Charities, Metropolitan Family Services, Center for Independent Living, and the DuPage Community Foundation.

e. Local and National Involvement and Communication HOPE staff frequently speaks before corporate groups, church, civic and school gatherings, and neighborhood and community coalitions in an effort to bring better understanding of fair housing issues and their impact on individuals and communities.

f. Code Enforcement Code inspectors from many DuPage County municipalities are working with HOPE to ensure that housing codes are being enforced fairly, and with compassion and understanding. Both HOPE and the code inspectors have gained much from this partnership.

g. National Media Campaign HOPE's director serves as a consultant to the National Fair Housing Alliance's National Media Campaign in the development and distribution of public service ads on fair housing, lending and home insurance. These radio and TV ads are heard and seen nationally and are designed to help victims better understand their rights and who to call should their rights be violated.

h. National Fair Housing Training HOPE's director serves on the faculty of the National Office of Legal Education for the Department of Justice in the training of United States attorneys from around the country on fair housing and related issues.

i. National Fair Housing Information and Outreach HOPE is a valuable resource to both public and private institutions with regard to fair housing issues. HOPE produced a video presentation for HUD at its national conference, which was shown to more than 1,200 attendees. HOPE assisted Fannie Mae in developing an effective outreach program for its national conference on predatory lending. Every fair housing center in the country uses some of the materials produced by HOPE to reach out to persons who experience discrimination.

j. Fair Housing Video Production and Distribution HOPE Fair Housing Center creates award winning video presentations and print materials for educational, motivational and corporate use. These videos are used extensively throughout DuPage County, the Chicago metropolitan area and in 45 states. Since 1995, HOPE has produced 12 videos on issues such as lending discrimination, opening doors in rural communities, accessibility and housing discrimination in America's cities. These videos are available at the HOPE office.

DuPage Center for Independent Living DCIL is an advocate organization for people with disabilities, and, in 1995, they began subcontracting with Access Living. Access Living is the independent living center in the City of Chicago. This subcontract provides funding to DCIL to work on fair housing issues in DuPage County with specific emphasis on issues relating to people with disabilities. Part of the project is to provide information and advocacy to open up more housing to people with disabilities. An example of this type of activity is to intervene when a landlord will not allow a guide dog on the property. DCIL also trains fair housing testers and does testing regarding rentals, sales of real estate, and mortgage lending.

Main Street Organization of Realtors The Realtors Association requires fair housing training for all new members and conducts a one-day training session for this purpose. In addition, all realtors are required to earn continuing education unit credits in order to retain their certification, and part of this continuing education is on fair housing issues. The instructors for the fair housing education activities must have the coursework approved by the State of Illinois. The Realtors Association encourages all member offices to sign a Voluntary Affirmative Marketing Agreement (VAMA) with HUD. The Association maintains an Equal Opportunity Committee to receive and investigate complaints regarding violations of the National Association's Code of Ethics and Code of Equal Opportunity in Housing. Disciplinary action may be taken by the Professional Standards Committee if findings of a violation are found.

DuPage Area Lenders Local lenders are trained on Regulation B, which is the Equal Credit Opportunity Act. Each lending institution is responsible for providing its own training to new and existing employees. However, there is a standardized test given to lenders to assure a basic understanding of fair lending law. The activities of DuPage area lenders are also impacted by the Community Reinvestment Act and the Home Mortgage Disclosure Act. All lenders must prepare information regarding compliance with these acts, and compliance with these acts is monitored by federal agencies.

II.B SUMMARY OF FAIR HOUSING COMPLAINTS AND ACTIONS

In 2008 HOPE Fair Housing Center identified the following problematic practices based on complaint and systemic investigations:

- Use of the internet for posting of rental vacancies on websites such as Craigslist to circumvent fair housing. For example, a listing may state “professional couples preferred” as a way of discouraging families from applying. Thirty-five complaints have been filed against landlords, realtors, and property management firms for this practice.
- Several instances have been reported to HOPE where unsuspecting families have been sold homes with illegal sleeping spaces in attics and basements (included in the total number of bedrooms on the listing sheets), without the families being told by the realtor, appraiser, home inspector, or lender that these spaces are illegal. Fact gathering investigations are underway; information will be turned over to HOPE attorneys. Meetings with the Board of Realtors to provide guidance are being planned.
- Lack of accessibility in newly constructed housing.
- Race and National Origin-based harassment by neighbors.
- Landlords who decline to make reasonable accommodations, e.g., handicapped parking spaces, or allowing the tenant to make reasonable modifications, at their own expense, such as ramps to allow wheelchair access to building entrances and other facilities.
- Landlords’ refusal to rent to families with children; unreasonable limitations on the number of children allowed to live in a unit; and imposing additional charges for children that are born into the family.
- Landlords who discriminate against Latino and new immigrant populations in regard to the terms and conditions of renting an apartment. Examples include inferior and substandard rental opportunities, extra charges for items like window screens, carpeting, etc.; and failure to return security deposits.
- Steering to specific neighborhoods or municipalities based on race or ethnicity.
- Discriminatory home or apartment insurance practices.
- Using a refusal to rent to families with housing choice vouchers (Section 8) as a guise to discriminate based on race or national origin.

Table 10

Previously Identified Impediments to Fair Housing

Misunderstandings about the nature of fair housing problems
Recognize that discrimination is a problem
Education of providers
Education of consumers
Local enforcement of fair housing laws
Need for better information and communication on fair housing issues
Confusion about terminology and responsibility
Get better information to decision makers
Conflicts between code enforcement and fair housing enforcement
High demand for housing and high cost of housing
High rate of growth
Difficulties of first time and lower income home buyers
State and federal programs that are not tuned to the cost structure of the suburbs
Housing costs added by local regulations, taxes and fees
Resistance to affordable housing
Resistance to change
Emphasis on low-density development
Multiple units of local government

Source: HOPE Fair Housing, 2007

- Predatory lending practices against low income and minority families.
- Refusing to rent or sell to individuals and families because of their race, national origin, or other protected class.

II.B.1 Status of Complaints Received by HOPE Fair Housing Center

Table 11
HOPE Fair Housing Center Service Statistics

	Calls*	No. of Complaints	Further Testing Required	Filed with HUD	HUD Referral	Filed in Fed. Court	Ref. to Attorney	Settled/ Conciliated	Mediated/ Resolved
Rental 2005	720	776	112	6	11	3	9	6	48
Rental 2006	685	471	86	8	24	3	18	3	61
Rental 2007	699	510	95	2	16	1	8	4	9
Rental 2008	705	584	120	22	12	2	16	2	2
Sales 2005	132	143	45	1	3	0	2	1	4
Sales 2006	104	50	22	0	2	0	3	0	3
Sales 2007	126	105	18	0	2	0	2	0	1
Sales 2008	138	92	22	4	2	0	4	2	2
Insurance 2005	21	23	3	0	0	0	0	0	1
Insurance 2006	24	1	1	0	0	0	0	0	0
Insurance 2007	12	5	0	0	0	0	0	0	0
Insurance 2008	5	4	0	0	0	0	0	0	0
Mortgage/Lending 2005	39	50	4	0	1	0	1	0	2
Mortgage/Lending 2006	27	8	4	0	1	0	0	0	1
Mortgage/Lending 2007	48	22	6	0	2	0	3	0	2
Mortgage/Lending 2008	75	18	5	0	1	0	1	0	0
Access/Disability 2005	186	135	51	2	12	0	12	4	42
Access/Disability 2006	211	44	15	0	4	0	6	2	14
Access/Disability 2007	228	228	34	0	10	0	8	1	6
Access/Disability 2008	198	228	39	2	8	0	9	2	4
Other 2005	865	702	64	0	8	0	5	2	19
Other 2006	542	114	19	0	13	0	27	5	26
Other 2007	573	310	47	0	0	0	26	0	14
Other 2008	615	329	52	0	0	0	15	1	4

*Telephone calls that HOPE has received and has determined are not discrimination complaints. These include technical assistance and housing voucher questions, code enforcement issues, tenant/landlord problems, housing availability, as well as referrals from other agencies (various county offices, fair housing agencies, social service agencies, housing management companies, etc.) These calls are handled either by HOPE staff or by a referral to the proper governmental or social service agency. This column does not include housing discrimination complaints that are processed and actively investigated by HOPE staff.

Table 11 provides a summary of HOPE Fair Housing Center service statistics for the period since the last Analysis of Impediments was conducted. Rental complaints continue to comprise the highest number of complaints and accessibility/disability complaints have risen significantly.

II.B.3 Legal Actions Involving Local Units of Government

III. SUMMARY OF FAIR HOUSING IMPEDIMENT ISSUES

The purpose of fair housing planning is to identify impediments to fair housing and to implement strategies for addressing these impediments. Below is a summary of issues that are seen as impediments to fair housing. In the terminology of this report, some impediments are direct and some are indirect. The statements of these issues come from evaluation of the data presented in this paper and from discussions with Fair Housing Task Force members. There are four major categories of impediments described.

III.A Misunderstandings About the Nature of Fair Housing Problems

The discussion of the Fair Housing Task Force suggests that many fair housing problems are exacerbated by general misunderstandings of the nature of the problem. Four specific issues are described below.

The Need to Recognize that Discrimination is a Problem The complaint data in this report, summarizing hundreds of fair housing complaints in the last year, indicates that discriminatory behavior exists.

The Need for Education of Providers By providers, we mean apartment managers, realtors, lenders, insurance agents, and others providing the services that give access to housing. The Task Force felt that there is a need for more than general education about the law. Information that would train providers in specific situations is useful, because, as noted by the Task Force, many providers may feel they know the law better than they actually do. It is especially important to contact small apartment owners because a large proportion of units are owned by small owners and they are the least likely to be contacted through regular outreach and education programs.

The Need for Education of Consumers Consumers often do not know when they have been the victims of discrimination. Many consumers are also generally unaware of public and private programs that can assist in finding and financing affordable housing.

The Need for Local Enforcement of Fair Housing Laws The fair housing complaint data in this report show that only a small portion of the complaints received are resolved.. Although federal and state agencies are often called in to enforce fair housing laws, the data in this report suggest that expanded local efforts may be needed to address the number of complaints received.

III.B Need for Better Information and Communication on Fair Housing Issues

Confusion About Terminology and Responsibility The terms "fair housing," "affordable housing," and "tenant/landlord disputes" are clearly defined differently and are separate issues. A tenant/landlord dispute can occur in housing that is affordable or housing that is not affordable, and the dispute may or may not infringe on rights to equal opportunity in housing. Likewise, discrimination can affect persons

seeking to rent or buy in any price range. However, these three issues may be connected, and, when addressing these concerns, public and private agencies that are responsible for addressing them often find that they overlap. As a result, they can often be confused about who should take responsibility for resolving the problem. Some times referrals are made to organizations that are not equipped to handle the problem. Better communication among these organizations would help resolve some of the misunderstandings.

The Need to Get Better Information to Decision Makers Decision makers at many different levels are often faced with difficult decisions that may have fair housing implications. There are two factors that make the need for this information important. First, DuPage continues to grow and its population is becoming more diverse. These trends mean that development and policy decisions are more often going to have fair housing implications. Second, the citizen resistance to affordable housing, to group homes for people with disabilities, and other housing options requires decision makers to sort out a number of claims about the impacts of these proposals. Therefore, a command of the facts about such housing is essential to making the best decisions.

Conflicts Between Code Enforcement and Fair Housing Enforcement It was noted that weak communication has contributed to these types of conflicts. Specifically, there is conflict between: (a) local government seeking to make physical improvements to declining units or to neighborhoods by enforcing codes and ordinances; and (b) neighborhood residents or landlords who may resist these efforts because of concern about how these improvements will impact them. Also, conflicts arise because there is uncertainty about who is responsible for fair housing activities, particularly enforcement of fair housing law. Because local governments in DuPage are not involved in fair housing enforcement, it creates conflicts with the private, state, and federal agencies that carry out enforcement activities.

A typical example is when a municipality receives complaints of overcrowding and substandard living conditions in a rental building. The municipality is obligated to investigate and resolve the complaint. However, the landlord, who stands to lose money as a result of the municipality's action to enforce its ordinances, files a fair housing complaint claiming that the municipality's action is selective enforcement in minority areas. The agency receiving the complaint (which could be a federal agency such as HUD or a local fair housing agency such as HOPE) is also obligated to investigate and resolve complaint. Regardless of whether the complaint has any basis, it absorbs time and money, and, in the interim, the problem goes unresolved. Better, or earlier, communication at critical points in this process, between local government and private sector fair housing agencies, may avoid the problem or help resolve it quicker.

III.C High Demand for Housing and High Cost of Housing

High housing prices, although not strictly a fair housing issue, can constitute a significant barrier to housing choice for households with lower incomes. The data presented in this report show that certain minority groups make up a disproportionate share of lower income households. In addition, we also know that older persons, persons with disabilities, and single parent households are more often lower income. Therefore, these households are disproportionately affected by higher costs. Below are some of the factors relating to this issue.

High Rate of Growth The high growth rate of population and jobs creates demand on the housing stock which results in lower vacancy rates and higher prices. The higher prices are evident in the data. One specific impact of higher costs is that many rental units are priced beyond the range where Housing Choice vouchers can be used. Those units that have lower costs also have lower vacancy-rates, which means that landlords are less inclined to accept the voucher. In the homebuyer market, high prices limit access by households with lower incomes, and the data show that a disproportionate number of these are minority households. The data in this report also show that the job growth rate is higher than population growth, and the largest increases are in low skilled jobs with lower pay. These trends are creating an imbalance between the jobs in the county and the housing that is available. Therefore, there is an

unfortunate down side to the strong economy of DuPage County, which is that it makes it more difficult to meet the demand for affordable housing.

Difficulties of First Time and Lower Income Home Buyers Due to high home values in DuPage, these buyers have a difficult time in finding a home. A primary factor is the shortage of lower cost units. However, another factor of importance is that these households often require more assistance from realtors and lenders to complete a successful purchase. It was noted that almost all steps in the process demand more effort from the professionals working with the homebuyer as well as from the homebuyers themselves. These difficulties, in addition to cost issues, form a deterrent to home ownership.

State and Federal Programs That Are Not Tuned to the Cost Structure of the Suburbs State and federal programs that provide direct subsidies or that provide financing to affordable housing projects do not adequately account for high costs. Federal and state financing programs often have per unit subsidy limits that are lower than the actual costs in DuPage, and the use of locally controlled funding (such as CDBG or HOME funds) to bring these costs down are sometimes not permitted by the underwriting standards of these federal or state programs.

Housing Costs Added by Local Regulations, Taxes, and Fees Zoning, subdivision, and building regulations; property taxes; and impact fees and exactions have an effect on the final price of housing. However, the local laws that add these costs are there to protect the housing consumer by maintaining quality and to fund local services like public education and fire protection. Therefore, it is not difficult to see why there is considerable debate regarding what is necessary and what is not, and whether there are alternative methods of financing some of the services that typically rely on property taxes.

III.D Resistance to Affordable Housing

As noted above, affordable housing is a key component of equal access to housing. The data herein show that African Americans and Hispanics in particular have disproportionately large percentages with lower incomes. Therefore, higher cost housing will disproportionately restrict these households in their housing choice.

Resistance to Change It was noted that some resistance to affordable housing is related to concerns about change in general. Development of any significantly sized parcel of land near existing residential areas in DuPage County is often met with opposition regardless of the nature of the proposal for that parcel.

Emphasis on Low Density Development A national trend in the suburbs, that also exists in DuPage, is an overall preference for low density housing development. Past urban experiences using high densities to meet the demand for lower income housing have often not been successful. These experiences have made the suburbs cautious about density. Therefore, even moderately higher densities, particularly rental housing, are often met with resistance. This resistance can make it more difficult to produce more affordable housing.

Multiple Units of Local Government Because most local governments are small jurisdictions, it is unlikely that each one can achieve a full range of diversity. Regarding housing and jobs issues, there is also a reasonable presumption that the jobs in one jurisdiction can be filled by a labor force that resides elsewhere. On the other hand, jurisdictions with large numbers of affordable units will often resist adding more affordable housing because they feel they have met their responsibility, and it is difficult to create affordable housing opportunities in higher cost communities. These dilemmas suggest the need for higher levels of cooperation among jurisdictions on housing issues.

Analysis of Impediments Action Grid

Summary of Impediments	Planned Actions	Actual Actions & Documentation
A. Misunderstandings about the nature of fair housing problems	<p>Complete updated survey of municipalities to:</p> <ul style="list-style-type: none"> • Learn more about their housing activities • Update status of their zoning ordinances re: group homes • Update status of their building codes re: ADA accessibility • Status of fair housing ordinances and Human Rights Commissions • Learn about the amount of fair housing complaints received and how they are handled <p>Outreach activities to highlight what constitutes fair housing and to ensure that residents know where to go for information and resolution of complaints. We believe we have many resources in place to obtain justice for our residents, but residents may not always be aware of these resources.</p>	
B. Need for better information and communication on fair housing issues	<p>Work with advocacy groups and municipalities to document how code enforcement activities are affecting fair housing.</p> <p>Research how the “crime free” housing movement is affecting fair housing.</p>	
C. High demand for housing and high cost of housing	<p>Work toward being more directive about where our Federal dollars are spent. We believe we have excellent geographic distribution of affordable units throughout the county; however, the county is now built out and fewer multi-unit projects will be constructed in the future. We will survey the geographic placement of our current units and identify areas in</p>	

	need of more affordable units. Affordability of housing and fair housing are two separate issues, but related in the sense that often the same groups are disenfranchised by each issue.	
D. Resistance to affordable housing	Work with municipalities that are not in compliance with the Illinois Affordable Housing Planning and Appeals Act to bring them into compliance.	