



**FINDINGS AND RECOMMENDATIONS ON
AFFORDABLE HOUSING AND RESIDENTIAL DESEGREGATION
FROM THE
HOUSING AFFORDABILITY AND RESIDENTIAL DESEGREGATION
INTEREST GROUP**

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FINDINGS AND RECOMMENDATIONS OF THE HOUSING AFFORDABILITY AND RESIDENTIAL DESEGREGATION INTEREST GROUP OF THE LEAGUE OF WOMEN VOTERS OF COOK COUNTY

Question Investigated

The Cook County League of Women Voters empaneled the Housing Affordability and Residential Desegregation Interest Group (H.A.R.D.) in June of 2016 to answer the question, “What can Cook County do to promote affordable housing while reducing segregation?” The H.A.R.D. team further refined the question to, “**What can Cook County government do to promote affordable rental housing for families with children while reducing segregation?**” Each component of that charge was carefully chosen:

- The availability and type of housing are influenced by every level of government. This study focuses exclusively on what **Cook County government** can do, including all government agencies with authority over land use in the County outside of Chicago: the Board of Commissioners and its committees, the Office of the President, the County Planning Department, the Cook County Land Bank, and the Housing Authority of Cook County.
- To limit the scope of the inquiry, the team decided to focus on **rental** housing, which is more likely to be accessible to people of modest means than purchased housing.¹
- We focused on housing **affordable** to low- and moderate-income households. The greatest need is among those at low and extremely low incomes as defined by the Federal government.
- The team agreed to focus on housing **for families with children**, as the literature confirms clear benefits to children who move to desegregated areas.²

Process

To investigate this question, we interviewed nearly three dozen people, including affordable housing developers, the agencies which fund them, other agencies charged with reducing segregation, and experts on housing and the history of its segregation. We also reviewed studies and reports by local policy organizations, academic institutions, and municipalities, as well as plans created by County agencies.

Exhibit A: List of interviewees.

Exhibit B: List of studies reviewed.

Exhibit C: List of suburban municipalities subject to the Affordable Housing Planning and Appeal Act (AHPAA) because less than ten percent of their housing stock is affordable.

We also include a Glossary of Terms.

Findings

1. **Integration through the provision of affordable housing throughout the County benefits everyone, while the costs of segregation are likewise imposed on us all.** As the Metropolitan Planning Council (MPC) points out in its report *The Cost of Segregation*, “Segregation is not only an issue in low-income communities or communities of color. Everyone pays a price If metro Chicago were less segregated, it could see \$4.4

billion in additional income each year, a 30 percent lower homicide rate and 83,000 more bachelor's degrees.”³

2. **Cook County has much less affordable housing than it needs.**

- a. **According to the DePaul Institute of Housing Studies, suburban Cook County has a shortage of 180,000 units affordable to lower-income households, and the gap between demand and supply is growing.** “Affordability” in this context refers to families earning 150% of the Federal poverty level and able to pay no more than \$940 per month in rent.⁴
- b. **Most affordable housing requires a Federal subsidy either to construct or to rent.** “Naturally occurring” (unsubsidized) affordable housing, generally two- to four-unit buildings, is being replaced in Cook County by high-rise construction for high-income renters, especially successful singles.⁵ Even when these developments include 10 or 20% affordable units, they rarely accommodate families,⁶ nor will 20 units here or there make a significant dent in the affordable housing shortage. Given land and construction costs in Cook County, only Federal dollars make it economically feasible to develop significant amounts of new affordable housing, especially for families.⁷
- c. **There are not enough Federal resources to meet demand.** The Federal Low-Income Housing Tax Credit (LIHTC) only funds 110,000 new units in the whole country annually, fewer than the number needed in Cook County alone.⁸ Housing Choice Vouchers, which subsidize rent in privately-owned buildings, provide an alternative to new construction, but the Cook County Housing Authority only receives enough Federal support to serve 14,000 households through vouchers.⁹ The waiting lists for vouchers are more than a year long,¹⁰ during which time households are rent-burdened (paying more than one-third of their income for rent) or severely rent-burdened (paying more than 50% of their income for rent).
- d. **The mismatch in Cook County between demand and supply of affordable housing is greatest in the northern suburbs, as Exhibit C shows.**

3. **Children benefit the most from desegregation.** When low-income families of color move into “opportunity areas” (defined in the Glossary: roughly, areas of wealth and good schools), their children experience impressive gains, especially where counseling and community support structures are provided.¹¹ According to the October 2009 Poverty and Race Research Action Council/Baltimore Regional Housing Campaign Report *New Homes, New Neighborhoods, New Schools* (p. 3), children in families who moved *from* communities that were 80 percent black and 33 percent poor *to* communities that were 21 percent black and 7.5 percent poor improved their test scores significantly: in the new neighborhoods’ elementary schools, 69 and 76 percent of students scored proficient or higher on state math and reading tests, compared with 44 percent and 54 percent in the original city schools. The white students in those neighborhoods experienced no decline in their performance as a result of integration.¹² These results were confirmed in 2014 in a study by Harvard economist Raj Chetty and his colleagues, showing that the youngest children who moved went on to earn 31 percent more than those who hadn’t moved. Outcomes for adults are less uniformly positive, at least as measured by income and educational attainment.¹³

4. **Racial segregation is pervasive even though it is illegal.**
 - a. **The patterns of segregation in Cook County are not natural.** Decades of intentional government policies created the residential segregation that exists today. These policies include the Federal Housing Administration’s refusal to lend to African-Americans during the post-World War II suburban building boom and state and local government toleration of racially restrictive covenants.¹⁴ The distorting effects of historic segregation are demonstrated in an analysis showing the difference between where African-American families would live (based on income in a free market) versus where they actually live.¹⁵ Black families are concentrated in neighborhoods poorer than their incomes would predict or permit.
 - b. **Segregation persists in suburban Cook County as a result of entrenched policies.** As the MPC explains, “[M]ajority white, affluent areas often enact policies that hinder the availability of economic mobility options, such as zoning laws that limit multi-family rental housing or smaller homes that might be more affordable.”¹⁶

In addition to low-density zoning and prohibition of rentals or apartment buildings, other obstacles to racial integration of the suburbs include neighborhood opposition (known by its acronym, NIMBY, meaning “not in my back yard”) and unlawful but still prevalent landlord discrimination against families with vouchers.
 - c. **Affordable housing in suburban Cook County serves predominantly, though not exclusively, people of color.**¹⁷ Because of the wealth and income gap between white and nonwhite families, permitting and creating affordable housing in affluent white suburbs is the most efficient way to integrate them racially.¹⁸
5. **Traffic congestion and pollution are reduced when people can live closer to their jobs.**¹⁹
6. **Communities with a variety of housing options can become more stable, more diverse, and less transient.**²⁰ Communities with housing at a variety of price points allow young adults to move back into the communities where they grew up, local workers to shorten or eliminate their commutes, and seniors to remain where they have their roots.²¹
7. **Free-market forces work against the continued availability of affordable housing.**²²
 - a. **In gentrifying areas the economic incentives are for developers to buy up properties, increase the number of units per square foot, shrink the average apartment size, and raise rents.**²³ Two-, three-, four- and six-flats, which provide much of “naturally occurring” affordable housing for families, are at the greatest risk of elimination.²⁴
 - b. **New affordable rental units don’t cost much less to build than market-rate rental units, but developers earn much less on them and so are reluctant to build them.**²⁵

- c. **Affordable housing set-asides in new buildings, also known as “inclusionary zoning,” can promote integration, but not unless these set-asides are mandatory.**²⁶ In cost-prohibitive areas that would not otherwise see housing for low-income people, many private developers prefer to deposit a required amount into an affordable housing fund rather than create affordable units themselves. However, municipalities are increasingly insisting on actual units on-site or nearby.²⁷
- d. **Permanent affordability is not a requirement for government financing.** LIHTC units need only be affordable for 30 years. HUD HOME funds have only a 15-year affordability period.²⁸ When affordability periods expire, the buildings can return to the market, pushing rents out of reach for low-income people.
- e. **Housing Choice Vouchers are a promising, cost-effective strategy, but have limited benefit in a costly market.**²⁹ Vouchers are rental subsidies for privately-owned housing. Rich Monocchio of the Housing Authority of Cook County (HACC) believes vouchers are the best tool to solve the affordable housing shortage.³⁰ However, HUD offers only a few higher-value vouchers for use in high-rent areas under an exception to its regulations known as “Small Area Fair Market Rent.” This limits vouchers’ effectiveness in assisting low-income people in moving to wealthy neighborhoods.³¹ And, as mentioned above, resources are scarce.

8. Cook County’s jurisdiction is narrow.

- a. **Cook County has very little power over housing.**³²
 - Only the State can amend the Affordable Housing Planning and Appeal Act (AHPAA) to create robust enforcement mechanisms which assure each suburb is providing its fair share of affordable housing and to make clear that its requirements apply to Home Rule communities.³³
 - Only municipalities can eliminate the primary obstacles to creation of affordable housing in their jurisdictions, namely single-family zoning, time-consuming approval processes, excessively rigorous building codes, and inconsistency in building requirements between municipalities.³⁴ The County can only change zoning in unincorporated areas, most of which lack proper infrastructure for development, including sewer and water.³⁵
- b. **The major supplier of subsidized affordable housing is the Housing Authority of Cook County, but it has insufficient resources and answers only to HUD.** The HACC Board is nominated by the County Board President and confirmed by the Board of Commissioners but is not otherwise answerable to the County. It also has insufficient funding to expand its activities significantly, and its funding has declined under every Federal administration.³⁶

- c. **Cook County as a home rule unit of government in Illinois does have taxation authority.** The ability to levy taxes or use tax abatements has potential for incentivizing affordable housing.³⁷

PLANNING RECOMMENDATIONS

As a recipient of HUD funds for housing and community development,³⁸ Cook County is required to draft a Consolidated Plan every few years that assesses level of met and unmet needs in the county (excluding Chicago, which receives its own funds and writes its own plan).³⁹ The Cook County Department of Planning and Development drafts the plan which includes an Annual Action Plan and a fair housing analysis.

1. The goals related to affordable housing from the 2015-19 Consolidated Plan should be reiterated in the 2019 Plan.⁴⁰ In addition, we would like to see new goals related to the following as recommended by the Chicago Metropolitan Agency for Planning (CMAP) in its *On to 50* report:⁴¹
 - Tax policy;
 - Development-specific revenues; and
 - Amendment to zoning laws in unincorporated Cook County to remove barriers to affordability.
2. Cook County should develop a system of incentives to encourage constituent suburbs to accept Local Technical Assistance from CMAP⁴² and the Illinois Housing Development Authority (IHDA)⁴³ to expand housing choice, including review of zoning and building codes and development and implementation of the plans required by the state's affordable housing statute.
3. Cook County should consider in its planning whether there are ways it can:
 - Encourage municipalities with inclusionary zoning/housing ordinances to require construction of actual affordable units and not merely payment into a fund.
 - Incentivize those without such ordinances to adopt them.
 - Establish a County-wide Inclusionary Zoning Administration to relieve the suburbs' administrative load. In its *Policy Focus Report on Inclusionary Housing*, the Lincoln Institute of Land Policy lists more than a dozen major tasks involved in administering these ordinances, everything from "communicating program requirements to developers and property managers" to "setting affordable rents" to "recertifying annual income of tenants."⁴⁴ These may be unduly burdensome to individual suburban governments.
4. In its planning, the Cook County Board should encourage Cook County Health, which serves over 300,000 people annually, to expand its collaborative efforts to facilitate the provision of affordable housing to its workers and to patients who use its facilities most frequently.
5. In the course of their Consolidated Planning, Cook County government and HACC should determine how the newly enacted federal Opportunity Zones credit provisions⁴⁵ can be used to increase the supply of affordable housing while reducing segregation.

6. Cook County should ensure racial and economic equity in all its decision-making. The suburban regions are starkly different.
 - a) Several areas in the south and west suburban areas have large minority populations with higher joblessness rates. Jobs are more plentiful in the northern suburban area.
 - b) As of 2013, 70% of Cook County voucher holders lived in the southern suburbs. Affordable housing is less accessible in the northern suburban area.⁴⁶
 - c) The areas with larger minority populations often display inequalities in access to good schools, shopping, and transportation.
 - d) Air, soil, and water quality are also concerns in these communities.

Cook County should develop comprehensive strategies that will advance racial equity and distribute more public funds into areas where this can lead to an increase in the economic base, thus producing more jobs. That should be coupled with incentives to use set-asides of affordable units in any new housing development, particularly in areas where affordability is a scarce commodity. These approaches will provide the region with more balanced access to affordable housing.⁴⁷

COMPLIANCE RECOMMENDATIONS

7. HACC should work to expand its pilot program increasing voucher availability in “opportunity areas.” This Small Area Fair Market Rental program, which sets voucher values based on individual suburbs or zip codes, has permitted low-income families to move to locations with better public schools and other amenities. However, because each of these vouchers contains a higher subsidy than ordinary vouchers, their use means fewer families can be served overall. Still, Monocchio noted that HACC has moved 75 families from Harvey (south suburb) to Streamwood (northwest suburb) and Skokie (north suburb) using a “porting” system targeting families with children 13 years old or younger.⁴⁸
8. Cook County government should allocate additional resources to the Cook County Commission on Human Rights so it can pursue more cases of housing discrimination, expanding its staff as necessary to engage in fair housing enforcement testing.⁴⁹ This will help assure implementation of the county’s source-of-income protection and also foster stability in already-integrated areas.
9. Cook County and HACC should foster stability in already-integrated areas by collaborating with private funders to provide pro-integrative home-loan and insurance-purchase programs such as Home Value or Home Equity Protection, which locks in current home values for the next 10 years, protecting concerned owners against any decline they fear will be caused by integration.⁵⁰

TAX-RELATED RECOMMENDATIONS

10. The Cook County Board should evaluate the success of the affordable housing trust funds operated by the state and the City of Chicago to determine whether a separate Cook County fund would be useful.

11. The Cook County Board, in consultation with the Assessor, should consider whether an increase in the transfer tax on sales of property in Cook County would be worthwhile if the proceeds were used to support affordable housing, including funding low interest loans and/or grants to rehabilitate multi-family housing in formerly redlined areas.
12. The Cook County Board should consider amending its ordinance relating to assessment classes (Cook County Code of Ordinances Section 74.63) to provide that the County approve Class 6b tax incentives only for industrial and commercial developments located in municipalities which are in compliance with the AHPAA's requirement that 10% of their rental housing be affordable. Alternatively, the Board could consider amending the ordinance to extend Class 6b tax incentives to residential development.
13. In correcting errors in assessed valuation, the Assessor should be particularly sensitive to past overvaluation of property in low- and middle-income neighborhoods and undervaluation of property in high-income communities. Overvaluation results in higher taxes, which increases the pressure on owners of affordable rental units to sell them for conversion to luxury accommodations.
14. The Cook County Board should consider supplementing the revitalization work of the Cook County Land Bank by creating a Cook County Community Land Trust to create and preserve affordable housing and guarantee its affordability in perpetuity. Community Land Trusts (CLTs) are nonprofit entities that purchase property and retain ownership of the land while permitting private ownership of the housing on it.⁵¹ Their governing boards (including elected officials, residents of CLT properties and community members) have a mandate to maintain the land's affordability and thereby control upward pressure on housing prices. The City of Highland Park created a CLT more than 15 years ago to develop new housing, own and control a portion of units in privately-developed multifamily buildings, and take donations of existing housing.⁵² This CLT now covers the north suburban region and is called Community Partners for Affordable Housing.

RECOMMENDATIONS TO THE COOK COUNTY LEAGUE OF WOMEN VOTERS

All interviewees agreed that the biggest obstacle to expansion of affordable housing is neighbors' opposition. The County League and its constituent local Leagues can help change local attitudes by:

- ✓ Sharing the data about the shortage of affordable housing in the County⁵³
- ✓ Showing that what does exist is concentrated into just a few disproportionately low-income communities, thus causing and exacerbating racial segregation.⁵⁴
- ✓ Explaining how regulations which look neutral on their face, such as single-family zoning, contribute to segregation and the shortage of affordable housing.⁵⁵
- ✓ Revealing the stories and the faces of affordable housing to counter NIMBYism.
- ✓ Reminding people that the largest housing subsidy in the country goes not to renters but to homeowners, in the form of the mortgage interest deduction. According to *The Atlantic*, "In 2015, the [Mortgage Interest Deduction] cost the federal government \$71 billion, more than double the \$29.9 billion funding for Section 8 [affordable housing]. Households earning more than \$100,000 receive almost 90 percent of the benefits."⁵⁶
- ✓ Emphasizing "values" in providing affordable housing, in much the same way a values argument supported the County's adoption of the minimum wage increase and paid sick leave.
- ✓ Promoting local referenda such as those employed for the minimum wage on compliance with the AHPAA's affordable-housing minima, to demonstrate community support for affordable housing.
- ✓ Adopting the findings and recommendations embodied in this report as the basis for their local League activities on affordable housing.

EXHIBIT A: INTERVIEWEES

1. Barbara Barreno-Paschal, Director of Housing, Chicago Lawyers' Committee for Civil Rights Under Law
2. Karl Bradley, Deputy Director, Affordable Housing, Cook County Department of Planning and Development
3. Rob Breyemeier, Executive Director, Oak Park Regional Housing Center
4. Jonathan Burch, Principal Planner, Chicago Metropolitan Agency for Planning
5. Kristi DeLaurentis, Executive Director, South Suburban Mayors & Managers Association
6. Patricia Fron, Executive Director, Chicago Area Fair Housing Alliance
7. Andrew Geer, Vice President and Chicago Market Leader, Enterprise Community Partners
8. Ranjit Hakim, Executive Director, Cook County Commission on Human Rights
9. King Harris, Board Chair, Illinois Housing Development Authority
10. Anne Houghtaling, Executive Director, HOPE Housing Center
11. Fritz Kaegi, Cook County Assessor
12. Bo Kemp, Partner, Faegre Baker Daniels (authority on Opportunity Zones)
13. Christine Klepper, Executive Director, Housing Choice Partners (authority on voucher mobility)
14. Richard Koenig, Executive Director, Housing Opportunity Development Corporation
15. Betsy Lassar, past leader, Interfaith Housing Development Corporation; co-founder, Highland Park Land Trust (spoke at a meeting of the group)
16. Peter Levavi, Senior Vice President, Brinshore Development
17. Leah Levinger, Executive Director, Chicago Housing Initiative
18. Rich Monocchio (x2), Executive Director, Housing Authority of Cook County
19. Marisa Novara, Vice President, Metropolitan Planning Council
20. Jennifer O'Neil, Housing Consultant (authority on voucher mobility)
21. Bob Palmer, Policy Director, Housing Action Illinois
22. John Petruszak, Executive Director, South Suburban Housing Center
23. Robert Rose, Executive Director, Cook County Land Bank
24. Russell Rydin, Executive Director, South Suburban Land Bank & Development Authority
25. Anthony Simpkins, Managing Deputy Commissioner, Housing Bureau, City of Chicago Department of Planning and Development
26. Geoff Smith, Executive Director, Institute for Housing Studies, DePaul University

27. Dr. Janet Smith, Co-Director, Nathalie P. Voorhees Center for Neighborhood and Community Improvement, University of Illinois at Chicago
28. Kyle Smith, Director of Housing Initiatives, Metropolitan Mayors Caucus
29. Larry Suffredin, Cook County Commissioner
30. Joanna Trotter, Senior Program Office for Equitable Development, Chicago Community Trust
31. Kate Walz, Vice President of Advocacy, Sargent Shriver National Center on Poverty Law
32. Jim Wheaton, Executive Director, Chicago Community Land Trust
33. Sue Wiemer, Chief Operating Officer, Turnstone Development Corporation
34. Josh Wilmouth, President and CEO, Full Circle Communities, Inc. (affordable housing developer)

EXHIBIT B: STUDIES REVIEWED*

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*Additional studies cited in endnotes.

Exhibit C: This is a list of all suburbs with fewer than 10% affordable housing units as determined by the Illinois Housing Development Authority. Each is required by state law to submit a plan for getting to 10%, though many fail to do so citing their home-rule status as a justification.

Affordable Housing Planning and Appeal Act: 2018 Report of Non-Exempt Local Governments in % order

#	Place	County	Population	Year Round Units	Total Affordable Units	Affordable Housing Share
1	Campton Hills	KANE	11500	3,504	27	0.8%
2	South Barrington	COOK	4766	1,483	12	0.8%
3	Long Grove	LAKE	8065	2,366	27	1.1%
4	Barrington Hills	COOK	3574	1,384	18	1.3%
5	Inverness	COOK	7844	2,714	36	1.3%
6	Western Springs	COOK	13133	4,346	64	1.5%
7	Deer Park	LAKE	3409	1,121	22	1.9%
8	Kenilworth	COOK	2613	792	18	2.2%
9	Glencoe	COOK	8870	3,081	78	2.5%
10	Oak Brook	DUPAGE	7988	2,986	77	2.6%
11	Timberlane	BOONE	1023	311	8	2.7%
12	Winnetka	COOK	12437	4,014	110	2.7%
13	Frankfort	WILL	18415	5,997	178	3.0%
14	North Barrington	LAKE	2972	1,046	31	3.0%
15	Northfield	COOK	5374	2,126	67	3.2%
16	Lakewood	MCHENRY	4111	1,320	42	3.2%
17	Burr Ridge	DUPAGE	10736	4,338	144	3.3%
18	Hinsdale	DUPAGE	17438	5,533	184	3.3%
19	Hawthorn Woods	LAKE	7590	2,394	81	3.4%
20	Green Oaks	LAKE	3832	1,140	40	3.5%
21	Prairie Grove	MCHENRY	1704	598	22	3.8%
22	Lake Bluff	LAKE	5758	1,992	76	3.8%

23	Lincolnshire	LAKE	7291	2,941	130	4.4%
24	Wilmette	COOK	27367	9,551	431	4.5%
25	Bull Valley	MCHEN RY	1213	429	20	4.6%
26	Wayne	DUPAG E	2513	929	44	4.8%
27	Lake Forest	LAKE	18881	6,557	348	5.3%
28	Lincolnwood	COOK	12637	4,118	227	5.5%
29	Lily Lake	KANE	1253	385	21	5.6%
30	Riverwoods	LAKE	3759	1,248	71	5.7%
31	Northbrook	COOK	33538	12,647	722	5.7%
32	Homer Glen	WILL	24385	8,337	492	5.9%
33	Kildeer	LAKE	3976	1,308	84	6.4%
34	Plainfield	WILL	41881	12,332	793	6.4%
35	Gilberts	KANE	7479	2,187	156	7.1%
36	Glenview	COOK	46559	16,782	1,223	7.3%
37	Deerfield	LAKE	18686	6,648	486	7.3%
38	Naperville	DUPAG E	145789	50,410	3,778	7.5%
39	Tower Lakes	LAKE	1149	387	30	7.7%
40	Geneva	KANE	21732	7,798	600	7.7%
41	Sleepy Hollow	KANE	3338	1,192	92	7.7%
42	Park Ridge	COOK	37567	13,834	1,112	8.0%
43	Elmhurst	DUPAG E	45742	15,535	1,278	8.2%
44	La Grange	COOK	15688	5,277	448	8.5%
45	River Forest	COOK	11217	3,788	340	9.0%
46	Highland Park	LAKE	29780	11,361	1,056	9.3%

Affordable Housing Planning and Appeal Act: 2018 Report of Non-Exempt Local Governments in alpha order

#	Place	County	Population	Year Roun d Units	Total Afforda ble Units	Affordabl e Housing Share
1	Barrington Hills	COOK	3574	1,384	18	1.3%
2	Bull Valley	MCHEN RY	1213	429	20	4.6%
3	Burr Ridge	DUPAG E	10736	4,338	144	3.3%
4	Campton Hills	KANE	11500	3,504	27	0.8%
5	Deer Park	LAKE	3409	1,121	22	1.9%
6	Deerfield	LAKE	18686	6,648	486	7.3%
7	Elmhurst	DUPAG E	45742	15,535	1,278	8.2%
8	Frankfort	WILL	18415	5,997	178	3.0%
9	Geneva	KANE	21732	7,798	600	7.7%
10	Gilberts	KANE	7479	2,187	156	7.1%
11	Glencoe	COOK	8870	3,081	78	2.5%
12	Glenview	COOK	46559	16,782	1,223	7.3%
13	Green Oaks	LAKE	3832	1,140	40	3.5%
14	Hawthorn Woods	LAKE	7590	2,394	81	3.4%
15	Highland Park	LAKE	29780	11,361	1,056	9.3%
16	Hinsdale	DUPAG E	17438	5,533	184	3.3%
17	Homer Glen	WILL	24385	8,337	492	5.9%
18	Inverness	COOK	7844	2,714	36	1.3%
19	Kenilworth	COOK	2613	792	18	2.2%
20	Kildeer	LAKE	3976	1,308	84	6.4%
21	La Grange	COOK	15688	5,277	448	8.5%
22	Lake Bluff	LAKE	5758	1,992	76	3.8%
23	Lake Forest	LAKE	18881	6,557	348	5.3%
24	Lakewood	MCHEN RY	4111	1,320	42	3.2%
25	Lily Lake	KANE	1253	385	21	5.6%

26	Lincolnshire	LAKE	7291	2,941	130	4.4%
27	Lincolnwood	COOK	12637	4,118	227	5.5%
28	Long Grove	LAKE	8065	2,366	27	1.1%
29	Naperville	DUPAG E	145789	50,410	3,778	7.5%
30	North Barrington	LAKE	2972	1,046	31	3.0%
31	Northbrook	COOK	33538	12,647	722	5.7%
32	Northfield	COOK	5374	2,126	67	3.2%
33	Oak Brook	DUPAG E	7988	2,986	77	2.6%
34	Park Ridge	COOK	37567	13,834	1,112	8.0%
35	Plainfield	WILL	41881	12,332	793	6.4%
36	Prairie Grove	MCHEN RY	1704	598	22	3.8%
37	River Forest	COOK	11217	3,788	340	9.0%
38	Riverwoods	LAKE	3759	1,248	71	5.7%
39	Sleepy Hollow	KANE	3338	1,192	92	7.7%
40	South Barrington	COOK	4766	1,483	12	0.8%
41	Timberlane	BOONE	1023	311	8	2.7%
42	Tower Lakes	LAKE	1149	387	30	7.7%
43	Wayne	DUPAG E	2513	929	44	4.8%
44	Western Springs	COOK	13133	4,346	64	1.5%
45	Wilmette	COOK	27367	9,551	431	4.5%
46	Winnetka	COOK	12437	4,014	110	2.7%

Glossary of Housing Terms and Acronyms

Affordable Housing: The U.S. Department of Housing and Urban Development (HUD) defines affordable housing as housing that costs less than 30% of a household's income. "Affordable housing" is also a term of art for housing that costs less than 30% of the income of households earning less than the Area Median Income (AMI, defined below).

The Affordable Housing Planning and Appeal Act (AHPAA) was passed by the Illinois General Assembly in 2003 to address the lack of moderately-priced housing in many Illinois communities, virtually all in the Chicago suburbs. The law established a process for identifying communities with a shortage of local housing stock (less than 10%) that would be available to homebuyers at 80% of AMI and renters at 60% of AMI. Those communities that are identified by the Illinois Housing Development Authority (IHDA) through a Census analysis as having under 10% affordable housing are required to develop a plan that will bring them into compliance. Compliance is assessed every 5 years and there is an appeal process that is available to developers if they feel that local government ordinances or municipal actions are creating impediments to the development of their project based on the affordable component. It is enforced by a State Housing Appeals Board (SHAB) appointed by the Governor that has the power to overturn local zoning to allow the housing to be built.

Area Median Income (AMI) is a benchmark calculated and published annually by HUD. "Median" means that half of all households in the area are estimated to have more than this amount of income and half have less. [Cook County's AMI is based on data from the Chicago-Naperville-Elgin or Chicago-Naperville-Joliet Metropolitan Statistical Area (MSA). Beside Cook County, this MSA includes DuPage, Grundy, Kendall, McHenry and Will Counties. For more information on the MSA, see *Changes to Illinois Metropolitan Statistical Area Delineations Following the 2010 Census*, Illinois Department of Employment Security, Economic Information and Analysis Division, February 2015.] Households are categorized by the percentage of AMI they earn. Thus:

- **A Very Low-Income Household** is a household with income at or below 50% of AMI adjusted for household size;
- **A Low-Income Household** is one with income at or below 80% of AMI adjusted for household size; and
- **A Moderate-Income Household** is one with income between 80-120% of AMI adjusted for household size.

Cook County's AMI is \$80,200 for a family of three and \$89,100 for a family of four. The complete calculations appear at the City of Chicago's website but are applicable to the entire MSA: https://www.chicago.gov/city/en/depts/dcd/supp_info/area_median_incomeamichart.html

Community Reinvestment Act (CRA): A Federal law requiring banks to invest a certain amount of their resources in low-income and nonwhite communities. The CRA was designed to overcome the effects of redlining, a practice (described below) of refusing to lend in such communities.

The Fair Housing Act, part of the Civil Rights Acts of 1965 and as amended, prohibits discrimination in the housing market throughout the nation on the basis of race, color, religion, national origin, sex, disability, and familial status (presence of children in the home). Cook County includes additional protections such as sexual orientation and gender status, housing status (that is, former homelessness), unfavorable military discharge status, marital status, and in 2019, arrest record. Often confused with affordable housing, fair housing is a right regardless of income. However, because people of color and households with children headed by women earn less than able-bodied whites, prohibiting affordable housing has an adverse fair housing impact that can be corrected by HUD and other government bodies.

Housing Trust Fund is a loosely defined term covering various types of public and nonprofit-controlled funds from which loans and grants are made for affordable housing. These trust funds are variously capitalized with public revenue, dedicated taxes, grants and payments from market-rate developers. The two most prominent in Cook County are:

- **The National Housing Trust Fund**, a HUD program that supports the acquisition, new construction, or reconstruction of rental units for extremely low-income families or families with incomes below the poverty line, whichever is greater. States and state-designated entities are eligible for funds.
- **Illinois Affordable Housing Trust Fund (IAHTF)**, established in 1990 and primarily funded by 50% of the State's receipts of the real estate transfer tax. It has been IHDA's most flexible resource for gap financing for rental housing and financing of smaller properties and the funds can also be used for leveraging funds from other sources. Eligible applicants include proprietorships, partnerships, nonprofit and for-profit corporations, units of local government and local housing authorities. Eligible activities include new construction, acquisition, and rehabilitation of rental properties, along with down payment/closing cost assistance for homebuyers, and rehabilitation and new construction of owner-occupied homes.

Mobility: The practice of encouraging low-income families to move to safer and wealthier neighborhoods. *Not to be confused with mobility as used in the context of housing accessible to people with disabilities.*

Opportunity Areas: A designation by HUD for areas with low poverty, safe neighborhoods and high-quality schools. The recently enacted Housing Choice Voucher Mobility Demonstration provides incentives to public housing agencies to help families realize their goal of moving to "high-opportunity communities." The 2019 funding bill included \$28 million for the demonstration: \$20 million for housing mobility services, \$5 million for new vouchers for families with children, and \$3 million for research. *Not to be confused with Opportunity Zones.*

Opportunity Zones: Areas designated for priority investment by the Tax Act of 2017. Developers who create or rehabilitate properties in Opportunity Zones receive tax advantages including lower tax rates and more rapid depreciation. *Not to be confused with Opportunity Areas.*

Public Housing: A term encompassing all subsidized rental housing, but most often used to describe units owned and managed directly by the Public Housing Authority. *Formerly known as “projects.”*

Public Housing Agencies (PHAs): Governmental agencies answerable to and funded by HUD, charged with providing affordable housing in a particular region. Cook County’s PHA is the Housing Authority of Cook County, with the unhappy acronym of HACC.

Redlining: The unethical practice that puts services (financial and other) out of reach for residents of a certain area based on race or ethnicity. The phrase “redlining” was coined by James McKnight, a sociologist, in the 1960s based on the practice of lenders actually drawing a red line on a map around areas in which they would not invest.

Section 8 housing: The name used to refer to privately-owned housing rented to low-income people who pay 30% of their income as rent and whose remaining rent is paid by the government. *Also known as “vouchers.”*

Source of Income Discrimination: The practice by private landlords of refusing to rent to tenants whose rent is partially paid by the local Public Housing Authority. This practice is prohibited in Cook County by ordinance, but many tenants still ask landlords, “Do you accept Section 8? Do you take vouchers?” and many landlords remain unaware of or indifferent to the prohibition.

Supportive Housing: Ongoing targeted and coordinated social services designed to support the homeless and individuals with disabilities so they can attain and retain their independence. Supportive housing is a subset of affordable housing.

Vouchers: Housing subsidies provided by HUD through Public Housing Authorities which enable low-income households to rent from private landlords. Tenants pay 30% of their income as rent and the PHA pays the balance directly to the landlord.

Endnotes

¹ Urban Institute, “Housing and Housing Finance” (October 31, 2018). Retrieved from: <https://www.urban.org/urban-wire/renters-are-more-likely-homeowners-struggle-paying-basic-needs> “Renters face greater financial uncertainties than homeowners, making them more vulnerable to hardship. More renters (28 percent) than owners (18 percent) express low confidence in their ability to produce a \$400 savings cushion to cover an emergency expense.”

² Nancy McArdle and Dolores Acevedo-Garcia, Joint Center for Housing Studies, Harvard University, “Consequences of Segregation for Children’s Opportunity and Wellbeing” (2017). Retrieved from: https://www.jchs.harvard.edu/sites/default/files/a_shared_future_consequences_of_segregation_for_children.pdf “Segregation is not benign. The neighborhoods where children live and grow are both separate and greatly unequal along racial/ethnic lines in ways that have profound impacts on opportunities for healthy child development and wellbeing.”

³ Metropolitan Planning Council (2017). *The Cost of Segregation*. Retrieved from <https://www.metroplanning.org/uploads/cms/documents/cost-of-segregation.pdf>

⁴ DePaul Institute for Housing Studies (2019). 2019 State of Rental Housing in Cook County. Retrieved from <https://www.housingstudies.org/releases/state-rental-2019/>

⁵ DePaul Institute, 2019: “Whereas units in two-to-four unit buildings represented 35.7 percent of the county’s rental stock in 2007, only 29.5 percent of the stock was in two-to-four unit buildings by 2017. The loss is significant for housing affordability— these units are a valuable source of affordable rental housing.” See also DePaul Institute for Housing Studies (2017). 2017 State of Rental Housing in Cook County. Retrieved from: <https://www.housingstudies.org/releases/2017-state-rental-housing-cook-county/> “...the share of rental units in single-family homes and larger multifamily buildings continues to increase, while the share of rental units in two-to-four unit buildings continues to shrink.”

⁶ Mike Maciag, “As Affordable Housing Shrinks, Where Can Families Live?” (2015), *Governing Magazine*, Retrieved from: <https://www.governing.com/topics/urban/gov-urban-affordable-housing-families.html> “With demand for smaller-size rentals as high as it currently is, there’s not much incentive for developers to build anything but studios, one-bedrooms and a limited number of two-bedroom units. Data compiled for *Governing* by the real estate analysis firm Axiometrics indicates that, on average, only 5 percent of market-rate rentals in larger cities have three or more bedrooms. Inclusionary zoning ordinances require or encourage developers to include affordable housing units in new residential developments. These laws have not, however, incorporated requirements for larger units with more bedrooms.”

⁷ Illinois' 2019 Annual Comprehensive Housing Plan, submitted to Gov. J.B. Pritzker and the Illinois General Assembly. Retrieved from: <http://www.ilga.gov/reports/ReportsSubmitted/226RSGAEmail503RSGAAttach2019%20Annual%20Comprehensive%20Housing%20Plan%20-%20Final.pdf> See pp.53-54. For all of Illinois, the cost per unit for multifamily housing is \$235,483, and the majority of development funding comes from Federal sources.

⁸ Corianne Payton Scally, et al. (2018). *The Low-Income Housing Tax Credit: Past Achievements, Future Challenges*. Retrieved from https://www.urban.org/sites/default/files/publication/98761/lithc_past_achievements_future_challenges_final_0.pdf See p. 8: “Since 1995, about 110,000 units receive new investments each year with the exception of a production down[turn] during the Great Recession (HUD 2015a). In contrast, public housing peaked at 1.4 million units in the mid-1990s and is down to under 1.0 million today.”

⁹ Housing Authority of Cook County, Annual PHA Plan (2018). Retrieved from: <http://thehacc.org/wp-content/uploads/2018/10/Draft-PHA-Annual-5-Year-Plan.pdf>

¹⁰ Affordable Housing Online, Housing Authority of Cook County. Retrieved from: <https://affordablehousingonline.com/housing-authority/illinois/Housing-Authority-of-Cook-County/IL025> “According to the 2016 Q4 Picture of Subsidized Households database, the housing authority's voucher program has an annual turnover of 7% having issued approximately 1,981 vouchers in the past year. The average voucher holder has received housing benefits for 10 years and 5 months. According to the 2016 PSH database, persons who were issued a voucher in the preceding 12 months waited an average of 14 months on the waiting list.”

¹¹ McArdle and Acevedo-Garcia (2017), “Numerous studies have shown the detriments of attending segregated, high-poverty schools on math and reading scores as well as on drop-out rates, while others have shown that black and Hispanic students exhibit improved achievement in integrated settings, while white students are not harmed. More recently, Schwartz's study of low-income children living in public housing in Montgomery County, Maryland whose families were randomly assigned to housing in neighborhoods with different poverty rates (with corresponding differences in school poverty) found that, in both math and reading, elementary school students who had been assigned to low-poverty schools significantly outscored their peers in moderate-poverty schools after five to seven years. By the end of elementary school, the substantial achievement gap between public housing children in the district's most advantaged schools and non-poor students was cut in half for math and by one-third for reading.”

¹² Laura Engdahl, Policy Race Research Action Council, *New Homes, New Neighborhoods, New Schools*, October 2009. Retrieved from: <https://www.racialequitytools.org/resourcefiles/engdahl.pdf>

¹³ Raj Chetty, Nathaniel Hendren, and Lawrence F. Katz, “The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment,” Harvard University, August 2015. Retrieved from: http://www.equality-of-opportunity.org/images/mto_paper.pdf

¹⁴ Richard Rothstein, *The Color of Law: A Forgotten History of how Our Government Segregated America*. (Liveright Publishing Co., 2017) See also interview with Rothstein in Shelterforce Magazine (2018). Retrieved from: *Once we understand that the racial segregation of every metropolitan area was created by unconstitutional, explicit government[al], racial policy designed to ensure that whites and Blacks could not live near one another, then we have an obligation to remedy it.*”

¹⁵ Applied Real Estate Analysis, Inc. (2012). *Analysis of Impediments to Fair Housing Choice: Presented to Cook County Department of Planning and Development*. Exhibit III-23. Retrieved from <http://blog.cookcountyil.gov/economicdevelopment/wp-content/uploads/2014/02/Analysis-of-Impediments-to-Fair-Housing-Choice.pdf>; Chris Fusco, Tim Novak and Mick Dumke, *Chicago Sun-Times*, and Brett Chase, Better Government Association, “Public Housing Families Flee to Suburbs: The number of subsidized households in Chicago’s suburbs jumped almost 30 percent since 2000,” June 25, 2016. Retrieved from: <https://www.bettergov.org/news/public-housing-families-flee-to-suburbs/> “Nearly half the suburbs’ subsidized-housing units – about 19,600 – are in suburban Cook County. Of the 17 Cook County suburbs with more than 400 such households, 11 are in southern Cook County, which has experienced dramatic economic and racial upheavals as white residents – as well as middle-income black families – moved elsewhere, according to records and interviews.”

¹⁶ Metropolitan Planning Council (2017). *The Cost of Segregation*. Retrieved from <https://www.metroplanning.org/uploads/cms/documents/cost-of-segregation.pdf>

¹⁷ Analysis of Impediments, id., Exhibit III-20

¹⁸ Cummins, Justin D. (1998). “Housing Matters: Why Our Communities Must Have Affordable Housing,” *Howard Law Journal*, Spring 1998, 41 How. L.J. 455. Retrieved from: <https://fairhousing.com/legal-research/legal-research-articles/housing-matters-why-our-communities-must-have-affordable> “Because people of color have comparatively less resources and wealth, they are disproportionately limited to living in low- or moderate-income housing. Therefore, the prohibition of less-expensive housing ... perpetuates the exclusion of people of color from more desirable housing and other aspects of the opportunity structure.”

¹⁹ Transit-Oriented Development Institute. Retrieved from: <http://www.tod.org/> Reducing car travel “greatly reduced dependence on foreign oil, reduced pollution and environmental damage.”

²⁰ See Arnab Chakraborty and Andrew McMillan, University of Illinois at Champaign-Urbana, “Is Housing Diversity Good for Community Stability?: Evidence from the Housing Crisis.” *Journal of Planning Education and Research* (2018) Retrieved from: <https://phys.org/news/2018-11-variety-housing-higher-foreclosure.html> “Areas with low diversity but high housing costs may ... force households to move farther away from their desired location, possibly increasing their transportation costs and their vulnerability to trigger events.”

²¹ Affordable Housing Planning and Appeal Act of Illinois (2003) asserts this as the reason for the State's affirmative interest in having affordable housing in all communities: "The legislature finds and declares that: (1) there exists a shortage of affordable, accessible, safe, and sanitary housing in the State; (2) it is imperative that action be taken to assure the availability of workforce and retirement housing; and (3) local governments in the State that do not have sufficient affordable housing are encouraged to assist in providing affordable housing opportunities to assure the health, safety, and welfare of all citizens of the State. (Source: P.A. 93-595, eff. 1-1-04.)" Retrieved from: <http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=2477&ChapterID=29>

²² Emily Badger, "The basic reason why there just isn't enough decent housing for the poor," Washington Post, July 26, 2016. Retrieved from: <https://www.washingtonpost.com/news/wonk/wp/2016/07/26/the-basic-reason-why-there-just-isnt-enough-decent-housing-for-the-poor/> "For renters who make 30 percent of the local median income, or even 60 percent, new multifamily buildings were simply impossible to build without public help once you factor in the costs of acquiring land, paying designers, constructing buildings, maintaining them and servicing loans." See also Urban Institute, Interactive feature, "The cost of affordable housing: Does it pencil out?" Retrieved from: <http://apps.urban.org/features/cost-of-affordable-housing/> "Subsidies are essential to closing the gap. Changes to land use, to regulations, or in what and how we build all will help close the gap, but we won't get where we need to be without subsidies."

²³ Nadia Balint, "As Apartments Are Shrinking, Seattle Tops New York with the Smallest Rentals in the U.S.," Rent Café Blog, November 30, 2018. Retrieved from: <https://www.rentcafe.com/blog/rental-market/real-estate-news/us-average-apartment-size-trends-downward/> "Chicago the second smallest rentals, 733 square feet."

²⁴ See DePaul Institute for Housing Studies, id., 2019.

²⁵ Urban Institute, Interactive feature, "The cost of affordable housing: Does it pencil out?" Id. "Development costs a lot of money. Developers rely on loans and other sources to fund construction before people move in and start paying rent. But developers can only get those loans and equity sources if the development will produce enough revenue to pay back the loans and pay returns to investors. The gap between the amount a building is expected to produce from rents and the amount developers will need to pay lenders and investors can stop affordable housing development before it even begins, leaving few options for the millions of low-income families looking for safe, affordable homes." See also interviews with Andrew Geer, Vice President and Chicago Market Leader, Enterprise Community Partners and Peter Levavi, Senior Vice President, Brinshore Development

²⁶ Nicholas Brunick, et al., "Voluntary or Mandatory Inclusionary Housing? Production, Predictability, and Enforcement," Business and Professional People for the Public Interest, August 2004. Retrieved from: <http://www.bpichicago.org/documents/mandatoryv.voluntary5.06.pdf> "On balance, experience and research indicate that mandatory, rather than voluntary inclusionary housing programs are more effective at generating a larger supply of affordable housing."

²⁷ Emily Thaden and Ruoni Wag, “Inclusionary Housing in the United States: Prevalence, Impact, and Practices,” Lincoln Institute of Land Policy (2017), Retrieved from: https://www.lincolnst.edu/sites/default/files/pubfiles/thaden_wp17et1_0.pdf “Compared to older [inclusionary zoning] programs, newer programs were: (1) more likely to apply to certain zones, neighborhoods, or districts; (2) less likely to use expedited permitting as an incentive; (3) less likely to use in-lieu fee as an option for developers to fulfill the program; and (4) more likely to allow developers to preserve/rehab existing housing.”

²⁸ HUD User, “What Happens to LIHTC Properties After Affordability Requirements Expire?,” Retrieved from: https://www.huduser.gov/portal/pdredge/pdr_edge_research_081712.html See also interview with Betsy Lassar, past leader, Interfaith Housing Development Corporation; co-founder, Highland Park Land Trust

²⁹ Andrea Juracek, et al., “Housing Mobility Programs in the U.S. 2018,” Poverty Race Research Action Council. Retrieved from: <https://prrac.org/pdf/mobilityprogramsus2018.pdf> “High Opportunity Areas have historically been difficult for families to move into, either because they are too expensive or because property owners choose not to participate in the voucher program.” See also interviews with Christine Klepper, Executive Director, Housing Choice Partners, and Jennifer O’Neill, Housing Consultant.

³⁰ See interviews with Rich Monocchio (x2), Executive Director, Housing Authority of Cook County

³¹ National Low-Income Housing Coalition, “HUD Provides Guidance on Small Area FMRs,” Apr 30, 2019. Retrieved from: <https://nlihc.org/resource/hud-provides-guidance-small-area-fmrs> “[W]ithout public notice, on August 10, 2017, HUD abruptly suspended the SAFMR rule for two years. Five civil rights organizations representing three plaintiffs sued HUD over the suspension (see Memo, 10/30/17). On December 23, 2017, the U.S. District Court for the District of Columbia granted a preliminary injunction against HUD, finding that HUD had neither the authority nor compelling reasons to suspend implementation of the use of SAFMRs. Notice PIH 2018-01 is a sign that HUD will not appeal the Court’s decision.”

³² Interview with Cook County Commissioner Larry Suffredin.

³³ Affordable Housing Planning and Appeal Act of Illinois (2003). Retrieved from: <http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=2477&ChapterID=29>

³⁴ Marisa Novara and Amy Khare, “Two Extremes of Residential Segregation: Chicago’s Separate Worlds & Policy Strategies for Integration.” Joint Center for Housing Studies, Harvard University. (2017) Retrieved from: https://www.jchs.harvard.edu/sites/default/files/a_shared_future_two_extremes_residential_segregation.pdf *“We are intrigued by efforts in other states to regulate their way to higher integration. Housing policymakers often cite Massachusetts’ 40B, the Comprehensive Permit Act, which allows developers to override local zoning in areas where less than 10 percent of housing stock is affordable. Since it was enacted in 1969, studies show that 40B has accounted for 60 percent of all new affordable units in the state. This sounds like an ideal model, except for the political realities in Illinois. Our own attempt at a similar statewide law, the Affordable Housing Planning and Appeals Act (AHPAA) of 2004, was so gutted in negotiations for passage that it has no enforcement mechanism. In 2015, 68 Illinois municipalities fell short of meeting the 10 percent affordable housing goal, yet 40 of those municipalities, or nearly 60 percent, begged off the need to reach that goal because of their home rule status... Illinois’ attempt at a regulatory approach has been a dismal failure, and something incentive-based may be the only political possibility.”*

³⁵ Civic Federation, Unincorporated Cook County, December 2014. Retrieved from: https://www.civicfed.org/sites/default/files/REPORT_UnincorporatedAreasofCookCounty.pdf *“Unincorporated residents who live in areas that have inadequate water and sewer infrastructure, or private well and septic systems that are failing and inadequate Sheriff’s police protection are most interested in being annexed by an adjacent municipality; Unincorporated residents interviewed were unconcerned about a lack of sidewalks, streetlights, curbs and gutters in their neighborhoods; Unincorporated residents interviewed did express a concern about the lack of building code enforcement in the unincorporated areas...”*

³⁶ Monocchio interview. See also “Housing Authority of Cook County Prepares for Budget Cuts,” April 11, 2017. Retrieved from: <http://thehacc.org/2017/04/11/housing-authority-cook-county-prepares-budget-cuts/>

³⁷ Suffredin interview. See also Cook County Department of Revenue, Retrieved from: <https://www.cookcountyil.gov/agency/department-revenue> *“The Department of Revenue collects and processes approximately \$460,000,000.00 per year...The Department of Revenue was established by the Cook County Board of Commissioners in December 1992. The Department collects Cook County home rule taxes and other fees, and administers and enforces such collections. The Department audits and maintains delinquent property tax records. The Department of Revenue also researches and proposes new revenue sources for the County.”*

³⁸ Cook County CDBG Application Guide, 2019. Retrieved from: https://www.cookcountyil.gov/sites/default/files/2019_cdbg_application_guide_1.pdf

³⁹ Ibid.

⁴⁰ Cook County Department of Planning and Development within the Bureau of Economic Development (2015). *Planning for Progress: Cook County's Consolidated Plan and Economic Development Strategy, 2015-19*. Retrieved from <http://blog.cookcountyil.gov/economicdevelopment/wp-content/uploads/2014/10/PFP.pdf>. Retrieved in Word from U.S. Department of Housing and Urban Development website: <https://files.hudexchange.info/reports/conplans/20152019201812141256CONPLCNSRT000000000017595000000000017595007884302XXXXCOOK%2BCOUNTYIL.docx>

⁴¹ Chicago Metropolitan Agency for Planning (2017). *Expanding Housing Choice*. Retrieved from <https://www.cmap.illinois.gov/documents/10180/470714/Expanding%20Housing%20Choice%20strategy%20paper/dbfeddfe-a977-4408-b6b0-e81f0f158039>

⁴² Ibid.

⁴³ Illinois Housing Development Authority (2018). *Affordable Housing Planning and Appeal Act: 2018 Non-Exempt Local Government Handbook*. Retrieved from <https://www.ihda.org/wp-content/uploads/2015/07/2018-AHPAA-Handbook-Final.pdf>; See also interview with King Harris, Board Chair, Illinois Housing Development Authority.

⁴⁴ Lincoln Institute of Land Policy (2015). *Inclusionary Housing: Creating and Maintaining Equitable Communities*, page 49. Retrieved from https://www.lincolnst.edu/sites/default/files/pubfiles/inclusionary-housing-full_0.pdf

⁴⁵ <https://www.irs.gov/newsroom/opportunity-zones-frequently-asked-questions>; See also notes on presentation by Bo Kemp, Partner, Faegre Baker Daniels.

⁴⁶ Fischer, Paul (1993). *Racial and Locational Patterns of Subsidized Housing in the Chicago Suburbs: A Report to the MacArthur Foundation*. Retrieved from <https://docplayer.net/8373408-Racial-and-locational-patterns-of-subsidized-housing-in-the-chicago-suburbs-a-report-to-the-macarthur-foundation.html>

⁴⁷ Interviews with Russell Rydin, Executive Director, South Suburban Land Bank & Development Authority; Joanna Trotter, Senior Program Office for Equitable Development, Chicago Community Trust; and Kristi DeLaurentis, Executive Director, South Suburban Mayors & Managers Association.

⁴⁸ Monocchio interview

⁴⁹ Interview with Ranjit Hakim, Executive Director, Cook County Commission on Human Rights

⁵⁰ Interview with Rob Breyemeier, Executive Director, Oak Park Regional Housing Center

⁵¹ Interviews with Betsy Lassar, past leader, Interfaith Housing Development Corporation and co-founder, Highland Park Land Trust, and Jim Wheaton, Executive Director, Chicago Community Land Trust.

⁵² https://www.cityhpil.com/government/city_departments/community_development/planning/housing.php

⁵³ Interviews with Bob Palmer, Policy Director, Housing Action Illinois, and Geoff Smith, Executive Director, Institute for Housing Studies, DePaul University.

⁵⁴ Monocchio interview.

⁵⁵ Interview with Patricia Fron, Executive Director, Chicago Area Fair Housing Alliance

⁵⁶ Thompson, Derek (2017, May 17). *The Shame of the Mortgage Interest Deduction*. *The Atlantic*. Retrieved from <https://www.theatlantic.com/business/archive/2017/05/shame-mortgage-interest-deduction/526635/>