



Analysis of Impediments
to Fair Housing Choice (AI)
Revised 2020 Update

DRAFT

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By federal law, it is illegal for any housing provider to discriminate in the sale or rental of housing on the basis of race, color, religion, national origin, sex/gender, familial status or disability. In the State of Illinois, it is also illegal to discriminate based on sexual orientation, marital status, military status, victims of sexual harassment and individuals with orders of protection (for victims of domestic violence).

Lake County, Illinois – as a HUD¹ -funded jurisdiction – is required to submit a certification with its Annual Action Plan that it will affirmatively further fair housing, which means taking meaningful actions to further the goals identified in an analysis conducted in accordance with the requirements of the Code of Federal Regulations (CFR) found at 24 CFR 5.150 (contained in **Appendix A**). Each jurisdiction must also pledge the opposite: That it will take no action materially inconsistent with its obligation to affirmatively further fair housing.

This report is a summary-level update of the full Analysis of Impediments to Fair Housing Choice (“AI”) authored by Lake County Community Development with its consultant, Applied Real Estate Analysis (AREA) in **2014**. Neither demographic nor housing settlement patterns in Lake County, Illinois has changed drastically since 2014, so this **2020 AI Update** is an opportunity to rearticulate Impediments and refresh commitments to actions that overcome Impediments articulated in 2014. Also, this update summarizes recent regional studies and approaches to ending Chicago’s regionwide patterns of segregation, such as the Metropolitan Planning Commission’s 2018 report, “Our Equitable Future: A Roadmap of the Chicago Region.”

The socioeconomic dynamics and geography of race, color, ethnicity and housing described in the **2014 AI** remain omnipresent. To confirm the lack of demographic shifts over the past five years that would cause material changes between an Analysis of Impediments to Fair Housing authored in 2014 or in 2019, the following table compares 2014 and 2019 data sets across the seven federal protected classes and finds little change:

#	Federal Protected Class	2014 Data	2019 Data
1.	Race	African-American 6.4% White Non-Hispanic 66.4%	African-American 6.6% White Non-Hispanic 63.4%, with small increases in Asian (6% to 6.9%) & Hispanic (19% to 20.9%) ethnicity
2.	Color	Black Non-Hispanic 6.5%	Black Non-Hispanic 6.6%
3.	Religion	No quantifiable change	
4.	National Origin	No quantifiable change	
5.	Sex (Gender)	No quantifiable change	
6.	Familial Status	Small decrease in female-headed households among some minorities (for African Americans, female-headed households decreased from 33% to 29% and for Asian-Americans, from 7% to 4%).	
7.	Disability	7% with a disability	9% with a disability

Given both this stable demographic environment and the complexity involved with addressing structural elements in our society that may undermine fair housing, Lake County in 2019 states regarding its **2014 AI: Much of the work identified in 2014 remains to be done.** Looking back at the 2014 Analysis of Impediments to Fair Housing Choice, a total of 20 impediments were identified in Lake County. In 2014, AREA grouped the 20 impediments into three categories – solely public sector, solely private sector and a combination of private/public sectors that are listed in **Table 1** below.

¹ U.S Department of Housing & Urban Development.

Table 1: 2014 Impediments

PUBLIC SECTOR IMPEDIMENTS	
Impediment 1.	The County does not have a comprehensive, long-term strategy for fair housing education for existing residents, potential residents, businesses, and officials in County. Consequently, there is a lack of awareness of fair housing laws.
Impediment 2.	The County has not developed a fair housing policy statement or fair housing ordinance that applies to incorporated and unincorporated areas.
Impediment 3.	Developments that require approval from the County or municipalities are not asked to demonstrate any actions taken to affirmatively further fair housing.
Impediment 4.	Zoning laws can limit the number of housing options for members of the protected classes.
Impediment 5.	There is not a dedicated County staff person responsible for fair housing.
Impediment 6.	There is not a long-term process in place for receiving and addressing housing discrimination complaints.
Impediment 7.	There is limited information on fair housing on the County website.
Impediment 8.	The County government does not maintain a comprehensive log of incidents of discrimination that occur within the County.
Impediment 9.	CDBG, HOME, and ESG funding applicants are not required to provide information on the applicants' efforts to affirmatively further fair housing.
Impediment 10.	In general, the County lacks initiatives that affirmatively further fair housing.
Impediment 11.	It is difficult to ascertain whether households have equal access to public housing and Housing Choice Vouchers.
Impediment 12.	Public transportation is not accessible by all County residents, in particular seniors and persons with disabilities.
Impediment 13.	County information should expand its affirmative marketing materials.
PRIVATE SECTOR IMPEDIMENTS	
Impediment 14.	The cost of both purchasing and renting housing in the County is relatively unaffordable for racial and ethnic minorities.
Impediment 15.	Racial and ethnic minorities are denied home purchase mortgages at a higher rate than white applicants.
Impediment 16.	Housing designated for moderate- and low-income families is concentrated in certain communities, not spread throughout the County.
PUBLIC-PRIVATE SECTOR IMPEDIMENTS	
Impediment 17.	"Fair housing" and "affordable housing" may often be used interchangeably by individuals in the private and public sectors.
Impediment 18.	Protected classes may not have equal access to housing opportunities.
Impediment 19.	There is a limited understanding of federal and state protected classes, in particular persons with a disability.
Impediment 20.	Throughout the County, there is a strong housing-jobs-transit mismatch.

Appendix B contains further comparison of detailed demographic data from 2014 compared to today. Additionally, the Chicago Metropolitan Agency for Planning (CMAP) makes this Community Data Snapshot available by municipality at the following website: www.cmap.illinois.gov.² CMAP is the official regional planning organization for the northeastern Illinois counties of Cook, DuPage, Kane, Kendall, Lake, McHenry, and Will and states in the Community Development section of its website:

Helping all communities prosper in the Chicago region is at the center of what we do. Persistent disparities, however, continue to exist along the lines of race and income that produce unequal outcomes. These inequities impact health, employment, education, public safety and many other elements of community. Inequity also fundamentally threatens the success and implementation of our regional principles, including inclusive growth. Our planning decisions and investments must prioritize equity and improving the lives of residents and families of all backgrounds and in every part of our

² Also available as a PDF file: <https://www.cmap.illinois.gov/documents/10180/102881/Lake+-+ALL.pdf>.

*region, particularly those that have historically been left behind.*³

Maps that illustrate – again – the geographic composition of our Lake County population by some federally protected classes (such as Race) and housing issues are detailed in **Appendix C**. Key housing-related disparities observed then remain true now. These key housing-related observations include:

- a. Certain areas of the County (North Chicago, Round Lakes, Waukegan, and Zion) contain concentrated populations of members of protected classes. These areas have concentrated poverty, but the minority concentrations are not related only to income.⁴
- b. Minorities bear a disproportionate share of housing cost burden in Lake County, with 38% of all Latinos and 49% of all African Americans in Lake County present in the below \$45k/yr income range where housing costs overwhelm the household budget.
- c. The need for better housing options remains persistent across several federally protected classes – large families, people with disabilities and people of color.

Additionally, Lake County’s provider of fair housing legal services and education since 2013, Prairie State Legal Services (PSLS), has continued to compile data on fair housing complaints. When a member of the public believes their fair housing rights have been compromised, they can do one or more of three things:

1. Discuss a fair housing complaint with the County-funded lawyer at PSLS, who can decide to pursue the complaint via legal process; and/or
2. File a fair housing complaint with the State of Illinois Department of Human Rights; and/or
3. File a fair housing complaint with the U.S. Department of Housing & Urban Development.

Complaints received by all three entities from Lake County residents are compiled in **Appendix D**.

LAKE COUNTY RESPONSE: 2015 to 2019

As some public sector Impediments can be addressed by a public sector entity, Lake County government has made administrative or other types of changes (documented in **Appendix E**) to address Impediments Six through Ten. Four of these five impediments were addressed through a combination of County staff-level or Agency-level operational changes. Impediment #10, “In general, the County lacks initiatives that affirmatively further fair housing” was addressed by the County’s restructuring of its HUD-funded investment portfolio in alignment with the findings and recommendations of the **2014 AI**.

Immediately following the release of its **2014 AI**, Lake County focused on affirmatively furthering fair housing when setting the goals of its 2015-19 Five-Year Plan for HUD Consolidated funding in several direct ways:

- Of the Consolidated Plan’s ten goals, three goals⁵ explicitly increased housing choice in Lake County and two were focused on improving high poverty neighborhoods; and
- Goal #7 set aside funding for people with disabilities, one of the federal protected classes; and
- Goal #8 aimed to foster welcoming, inclusive and neighborly suburban communities; and
- For the first time in Lake County history, CDBG investment goals changed from spreading the funds between as many municipalities as possible to a two-pronged approach – suggested by the **2014 AI** – to focus CDBG investment on both Target areas⁶ with concentrated poverty and minority concentrations (illustrated in **Appendix C**) AND high opportunity areas that lack affordable housing.

³ <https://www.cmap.illinois.gov/programs/community-development> (retrieved 4.30.19).

⁴ This finding was further explored by U.S. Census data in “The Opportunity Atlas” profiled below.

⁵ Goal #1: Rehab housing; Goal #2: Create New Housing; and Goal #4: Provide direct assistance to facilitate and expand homeownership among and/or to provide rental assistance to persons of low- and moderate-income.

⁶ Please see **Figure 2** and **Appendix I**.

In Lake County’s 2015-19 Consolidated Plan, the federal dollars allocated to affordable housing increased from 41% (County historical average) to a five-year goal of 59%. This goal was based on housing allocation percentages in similarly-sized urban counties nationwide. In addition to shifting funding amounts in support of affirmatively furthering fair housing, Lake County adapted its housing application scoring criteria to create a preference for new housing, specifically rental housing for large families, in high opportunity areas. These changes to housing application scoring included, on a 465-point scale:

- Geographic Priorities
 - 20 points – employment and transit center with low supply of affordable housing
 - 25 points – identified by State of Illinois as having less than 10% of housing stock affordable
- Neighborhood Analysis
 - 15 points – new housing choice fits neighborhood
 - 20 points – significant new housing choice that fits neighborhood
 - 25 points – significant new housing choice for FAMILIES (3BR) fits neighborhood
- Accessible Units – up to 10 points
- BONUS – 5 point per assisted unit
 - Rental units
 - Units reserved for people with disabilities and/or permanent supportive housing

As a result, 2015-19 target funding levels for housing close to employment/transit – “high opportunity areas” – increased from 11% to 28%. **AI-related changes to the CDBG Public Improvements application are detailed in Appendix F.**

With a preference for affordable housing in high opportunity areas firmly established, the County sought local municipalities willing to locate high-quality affordable housing for families in high opportunity areas. Over the course of the five-year plan, Lake County was able to dedicate housing grant dollars to the following affordable housing projects in high opportunity areas:

Table 2: 2015-19 Large Affordable Housing Developments Funded by Lake County in Opportunity Areas

AREA	PROJECT (Developer)	HUD \$\$\$ ALLOCATED
Deerfield	Zion Woods (Housing Opportunity Development Corporation)	\$1,480,000
Mundelein	Fairhaven Crossing (Verigreen)	\$301,520
Gurnee/Waukegan	LakeView Pointe (Community Partners for Affordable Housing)	\$775,000

In addition, the community land trust managed by Community Partners for Affordable Housing (CPAH) continued investing in two to four units of new homeowner or rental single-family housing in high opportunity North Shore communities, Highland Park and Lake Forest, annually.

In response to the initiatives of former President Obama, in May 2016, Lake County Community Development also revised its Citizen Participation Plan to require public notices in any language that is the primary language of greater than 10% of Lake County population. As of 2014, the second most common language spoken at home in Lake County was Spanish, with 16.56% of residents speaking Spanish at home. Since then, all Community Development Plans and Amendment Notices pertaining to funding from the U.S. Department of Housing and Urban Development (HUD) have been published jointly in English and Spanish.

When audited in late 2017 by HUD for program year 2015 performance in support of “fair housing and equal opportunity civil rights,” Lake County reported these early 2015-19 Consolidated Plan efforts. In response, HUD awarded Lake County a clean audit with neither concerns nor findings.

In December 2019, the Lake County Board adopted the Fair Housing Policy Statement to address both Impediments #2 “The County has not developed a fair housing policy statement or fair housing ordinance that applies to incorporated and unincorporated areas and #5 “There is not a dedicated County staff person responsible for fair housing.” The Statement is included in **Appendix G**. Over this time frame, community-wide conversations on race and equity emerged both regionally and nationally. Excerpts of these broader themes are highlighted in **Appendix H**. Best practices and Lake County maps to be considered in future work are contained in **Appendices I and J**.

COLLECTIVE NEXT STEPS

The **2014 AI** presented a myriad of potential action steps on the 20 Impediments. At that time, Lake County needed a range of potential actions from which to select, as the community conversation around these issues was emerging. After both the advances in community dialog outlined above and five years of working to address these 20 Impediments, this **2020 AI Update** outlines a community-wide action plan with clearer focus. Such focus begins with dropping five impediments that have been substantially addressed with changes that have been institutionalized (see Appendix E) in the hopes these impediments (six through ten) will continue to be addressed. Additional focus for this **2019 Update** is further provided in three ways:

1. *Proposed Implementation Partners*. To provide greater focus for the next five years, this **2020 AI Update** goes one step further than the **2014 AI**’s grouping by public sector, private sector and both sectors (see **Table 1**). The tables below suggest the types of local entities (county, municipalities, agencies, housing authorities, transit providers, lenders, employers) most likely to have the relevant reach required to address each impediment. These entities are suggested in **Table 3**. In most cases, collaboration between several types of entities – most likely facilitated by Lake County as the author of this **2020 AI Update** – will be most effective. Positive change in these areas is voluntary and cannot be mandated.
2. *Specific Action Steps*. For each of the **remaining 15 impediments**, a single action step from the **2014 AI** is recommended in **Table 4** plus a new Action Step is proposed in **Table 5**. Incorporating both new learnings and best practices (listed in **Appendix I**) increases the countywide chance of success.
3. *Recommendations for the 2020-24 Consolidated Plan*. It is once again of key importance that Lake County aligns investment of HUD funding over the new five-year (2020-24) cycle in ways that overcome impediments to fair housing choice. In each five-year plan, HUD provides the opportunity to address priority needs as defined by the community. In 2015-19, Lake County adopted HUD’s three performance objectives – create suitable living environments, affordable housing and economic opportunity – as priority needs. The recommendation of this **2020 AI Update** is to refine these priority needs for the 2020-24 Consolidated Plan include priorities outlined here such as:

- INCLUSIVE GROWTH
- BORDERLESS TRANSIT (TO INCREASE ACCESS TO JOBS BY LOW/MOD RESIDENTS & PEOPLE W/DISABILITIES)⁷

Additionally, the 2015-19 Consolidated Plan successfully targeted investment in affordable housing, economic development for low/moderate income workers and assistance for people with disabilities. These goals should be pursued with even greater focus:

- ASSIST PEOPLE WITH DISABILITIES
- MAXIMIZE AFFORDABLE HOUSING
- PRIORITIZE PATHWAYS FOR ECONOMIC MOBILITY

⁷Please see <http://www.lakecountylil.gov/3770/Paratransit-Market-Study> (p 20).

Table 3: Thirteen Remaining Impediments With Entity Types Most Likely to Implement Solution(s)

#	IMPEDIMENT TO FAIR HOUSING CHOICE	County	Municipalities	Fair Housing Agency	Housing Authorities	Regional Transit	Regional Lenders	Regional Employers
1	The County does not have a comprehensive, long-term strategy for fair housing education for existing residents, potential residents, businesses and officials in the County. Consequently, there is lack of awareness of fair housing laws.	X	X					
3	Developments that require approval from the County or municipalities are not asked to demonstrate any actions to affirmatively further fair housing.	X	X					
4	Zoning laws can limit the number of housing options for members of the protected classes.	X	X					
11	It is difficult to ascertain if households have equal access to public housing and Housing Choice Vouchers.	X		X	X			
12	Public transportation is not accessible by all County residents, in particular seniors and persons with disabilities.				X			
13	County information should expand its affirmative marketing materials.	X						
14	The cost of both purchasing and renting housing in the County is relatively unaffordable for racial and ethnic minorities.	X	X					
15	Racial and ethnic minorities are denied home purchase mortgages at a higher rate than white applicants.					X		
16	Housing designated for moderate- and low-income families is concentrated in certain communities, not spread throughout the County.	X	X					
17	“Fair housing” and “affordable housing” may often be used interchangeably by individuals in the private and public sectors.	X	X	X	X	X		
18	Protected classes may not have equal access to housing opportunities.	X	X					
19	There is limited understanding of federal and state protected classes, in particular of persons with a disability.	X		X				
20	Throughout the County, there is a strong housing-jobs-transit mismatch.	X	X		X	X	X	

This **2020 AI Update** would not be complete without a discussion of 2014 action steps still pending plus the addition of new potential action steps that have surfaced since 2014. In the following two tables, both initial and newly suggested action steps are organized by Impediment with a nod to various entities that are most likely to implement one or more proposed solutions.

Table 4: Original 2014 Action Steps by Impediment (Including Proposed Implementation Partners)

#	REFRESH COMMITMENT TO 2014 ACTION STEPS	County	Municipalities	Fair Housing Agency	Housing Authorities	Regional Transit	Regional Lenders	Regional Employers
1	Continue fair housing training sessions, develop training/outreach benchmarks, host regional housing discussions.	X	X					
3	Encourage affirmative marketing by housing developers, pair County subsidies with private developments and consider a variety of housing types to meet resident needs.	X	X					
4	Recommend fair guidelines for zoning & building codes at county and municipal levels.	X	X					
11	Encourage housing authorities to participate in fair housing activities and to advertise openings in any language that is the primary language of 10% or more of County residents.	X	X	X				
12	Identify opportunities to expand public transportation options in the area. Assist with implementation of para-transit market study.				X			
13	Finish review of County publications, and expand availability of materials in primary language of 10% or more of County residents.	X						
14	Consider establishing programs in which developers acquire reduced-cost land through County tax sale process for new affordable housing. Conduct forums with private developers to identify the barriers to creating lower cost for-sale and rental housing. Expand relationships with housing developers, encourage affordable housing development, consider inclusionary zoning mechanisms.	X	X					
15	Support home purchase counseling; expand marketing of loan products.					X		
16	Develop tool kit for municipalities to respond to State of IL Affordable Housing Planning and Appeal Act.	X	X					
17	Conduct extensive education and outreach in consumer, government and private sectors.	X	X	X	X	X		
18	Foster relationships with real estate professionals to expand housing choice, continue testing, engage community groups.	X	X					
19	Provide training sessions for real estate professionals & public.	X		X				
20	Assist in expanding the supply of housing near employment centers; Consider infrastructure project elements that support public transportation.	X	X	X	X		X	

Table 4 profiles action steps proposed in the **2014 AI** that remain timely and pertinent in today’s environment. These actions take considerable collaboration, research, public input and staff time in order to be implemented.

Table 5: Proposed Additional Action Steps by Impediment (Including Proposed Implementation Partners)

#	POTENTIAL ADDITIONAL ACTION STEPS (BY IMPEDIMENT)	County	Municipalities	Fair Housing Agency	Housing Authorities	Regional Transit	Regional Lenders	Regional Employers
1	Explore social media and other new outreach & marketing opportunities for fair housing education.	X	X					
3	Consider requiring developers to consult with transit agencies to verify that proposed developments do not negatively affect existing or planned transit service. Consult directly with developers to ensure that development does not negatively affect bike or pedestrian networks. (CMAP On To 2050)	X	X					
4	Consider updating plans, zoning codes, and development regulations to incentivize greater densities and mixed uses near rail stations and along high-priority bus corridors with a preference toward employment rich land uses. (CMAP On To 2050) Codes could also contain "visitation" and/or accessibility requirements.	X	X					
11	Continue funding Prairie State Legal Services to provide frequent training sessions for residents and staff of all three housing authorities.	X	X	X				
12	Invest in strategic "borderless transit" pilots (e.g. CDBG Public Services) to improve connectivity between job hubs and both people with disabilities and low-income communities.				X			
13	Increase visibility of County's "You are Welcome Here" campaign. Explore working with the Lake County Board's Diversity & Inclusion Committee.	X						
14	Prioritize affordable housing in opportunity areas. Work with developers to create lower-cost for-sale and rental housing that fits well in local communities. Consider innovative types of housing such as cohousing (e.g. www.cohousing.org), accessory dwelling units (ADUs), climate resilient housing and tiny house developments.	X	X					
15	Assess the extent to which this issue is being monitored by banking regulators, and extent to which County can help.					X		
16	Work with Lake County Municipal League to build capacity of local landbank to redevelop vacant land.	X	X					
17	Continue to address impediments that affect all protected classes, not just lower-income members of protected classes.	X	X	X	X	X		
18	Continue expanding homeownership among protected classes, with bilingual down-payment assistance and the community land trust model.	X	X					
19	Expand training sessions on reasonable accommodations for people with disabilities to real estate professionals and general public.	X	X					
20	Encourage employers to locate jobs near transit and collaborate with workforce development service providers to determine transportation needs and address them.	X	X	X	X	X		

According to CMAP *On To 2015*, emerging research shows that placing employment near transit may have an even stronger impact on the success of transit. Planning for bus and rail transit-supportive land uses must also involve enhancing pedestrian and bike connections to transit, thereby making it easier and safer for employees and residents near transit corridors to walk or bike to rail or bus stations.

Appendices

Appendix A	Code of Federal Regulations (CFR) – Analysis of Impediments
Appendix B	American Community Survey Demographic Data Tables
Appendix C	Demographic and Housing HUD CPD Maps
Appendix D	Fair Housing Complaints 2015 to 2018
Appendix E	2014 Impediments Addressed
Appendix F	CDBG Scoring Bonus for Affirmatively Furthering Fair Housing
Appendix G	Lake County Fair Housing Policy Statement
Appendix H	National Conversations on Race, Housing & Equity
Appendix I	Best Practices
Appendix J	Maps in 2020-24 Consolidated Plan for HUD

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Appendix A
Code of Federal Regulations

§91.225 Plan Certifications

Affirmatively furthering fair housing.

Each jurisdiction is required to submit a certification that it will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the AFH⁸ conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, and that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.

§5.150 Affirmatively Furthering Fair Housing: Purpose

Pursuant to the affirmatively furthering fair housing mandate in section 808(e)(5) of the Fair Housing Act, and in subsequent legislative enactments, the purpose of the Affirmatively Furthering Fair Housing (AFFH) regulations in §5.150 through §5.180 is to provide program participants with an effective planning approach to aid program participants in taking meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination. The regulations establish specific requirements for the development and submission of an Assessment of Fair Housing (AFH)...in a manner that connects housing and community development policy and investment planning with meaningful actions that AFFH. A program participant's strategies and actions must AFFH and may include various activities, such as developing affordable housing, in areas of high opportunity; strategically enhancing access to opportunity, including through: Target investment in neighborhood revitalization or stabilization; preservation or rehabilitation of existing affordable housing; promoting greater housing choice within or outside of areas of concentrated poverty and greater access to areas of high opportunity; and improving community assets such as quality schools, employment and transportation.

§5.151 Affirmatively Furthering Fair Housing: Implementation

Section 5.160 of the AFH regulations provides the date by which program participants must submit their first AFH.⁹ Until such time, the program participant shall continue to conduct an analysis of impediments as required of the program participant...in accordance with requirements in effect prior to August 17, 2015.

⁸ Some versions still say "AFH" – the temporarily required Assessment of Fair Housing – although HUD is developing a proposed rule to amend the existing AFFH regulations.

⁹ Federal Register Notice published January 5, 2018 extended deadline for AFH submission to "their next AFH submission date that falls after October 31, 2020." On May 23, 2018 the AFH Assessment Tool for Local Governments was withdrawn.

Appendix B
ACS Demographic Data Tables

TABLE 1 - Total Population of Lake County

Year	Population	% Change
1980	440,372	NA
1990	516,418	17.27%
2000	644,356	24.77%
2010	704,596	9.35%
2012	702,120	-0.35%
2017	703,520	0.20%

Source: U.S. Census Bureau, 1980, 1990, 2000, 2010, 2012, and 2017 American Community Survey 1-Year Estimates

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TABLE 2 - Race and Ethnicity of Individuals

	1990		2000		2010		2012		2017	
	Number	%	Number	%	Number	%	Number	%	Number	%
White alone	430,566	83.4%	472,968	73.4%	458,731	65.1%	558,340	64.3%	431,852	61.4%
Black or African American alone	33,736	6.5%	43,580	6.8%	45,332	6.4%	451,690	6.8%	46,372	6.6%
American Indian, Alaska Native, Native Hawaiian and Other Pacific Islander alone	1,009	0.2%	1,272	0.2%	1,559	0.2%	44,266	0.2%	1,144	0.2%
Asian alone	12,135	2.3%	24,866	3.9%	42,735	6.1%	47,769	6.3%	53,834	7.7%
Some other race alone	402	0.1%	1,085	0.2%	1,228	0.2%	325	0.0%	2,405	0.3%
Two or more races:	---	---	7,869	1.2%	14,185	2.0%	12,888	1.8%	14,080	2.0%
Hispanic or Latino	38,570	7.5%	92,716	14.4%	140,826	20.0%	143,780	20.5%	153,833	21.9%

Source: U.S. Census Bureau, 1990, 2000, 2010, 2012, and 2017 American Community Survey 1-Year Estimates

TABLE 3 - Language Spoken at Home

Year	2012		2017	
	Count	Percentage	Count	Percentage
Total Persons*	657,620	100%	662,763	100%
Speaks only English	475,502	72.31%	475,837	72%
Speaks another language**	182,118	27.69%	186,926	28%
Spanish or Spanish Creole	108,906	16.56%	112,173	17%
Other Indo-European languages	43,028	7%	42,840	6%
Asian and Pacific Island languages	27,330	6%	27,863	4%
Other languages	2,854	2%	4,050	1%

*Five years of age and older

Source: U.S. Census Bureau, 2012 and 2017 American Community Survey 1-Year Estimates

TABLE 4 - Population of Persons with a Disability

	Under 5				5 to 17 yrs old			
	2012		2017		2012		2017	
	Number	%	Number	%	Number	%	Number	%
Without a Disability	44,500	99%	40,277	99%	140,095	97%	126,142	96%
With a Disability	388	1%	480	1%	5,032	3%	4,803	4%
With a hearing difficulty	348	90%	442	92%	1,142	23%	1,109	23%
With a vision difficulty	275	71%	38	8%	990	20%	655	14%
With a cognitive difficulty					3,366	67%	3,233	67%
With an ambulatory difficulty					472	9%	466	10%
With a self-care difficulty					860	17%	723	15%
With an independent living difficulty								

Source: U.S. Census Bureau, 2012 and 2017 American Community Survey 1-Year Estimates

TABLE 4 - Population of Persons with a Disability

	18-64 yrs old				65 yrs and older			
	2012		2017		2012		2017	
	Number	%	Number	%	Number	%	Number	%
Without a Disability	425,824	95%	391,947	93%	76,624	75%	68,366	73%
With a Disability	22,562	5%	30,156	7%	25,757	25%	25,665	27%
With a hearing difficulty	3,856	17%	7,101	24%	9,052	35%	11,464	45%
With a vision difficulty	3,679	16%	6,729	22%	3,692	14%	3,473	14%
With a cognitive difficulty	8,853	39%	10,896	36%	6,498	25%	4,765	19%
With an ambulatory difficulty	11,427	51%	11,278	37%	16,865	65%	14,432	56%
With a self-care difficulty	5,818	26%	4,021	13%	6,884	27%	4,457	17%
With an independent living difficulty	8,998	40%	9,403	31%	12,098	47%	10,500	41%

Source: U.S. Census Bureau, 2012 and 2017 American Community Survey 1-Year Estimates

TABLE 4 - Population of Persons with a Disability

	Total			
	2012		2017	
	Number	%	Number	%
Without a Disability	687,043	93%	626,732	91%
With a Disability	53,739	7%	61,104	9%
With a hearing difficulty	14,398	27%	20,116	33%
With a vision difficulty	8,636	16%	10,895	18%
With a cognitive difficulty	18,717	35%	18,894	31%
With an ambulatory difficulty	28,764	54%	26,176	43%
With a self-care difficulty	13,562	25%	9,201	15%
With an independent living difficulty	21,096	39%	19,903	33%

Source: U.S. Census Bureau, 2012 and 2017 American Community Survey 1-Year Estimates

TABLE 5 - Income of Persons with a Disability

Year	2012	2017
Total (all persons)	\$37,730	\$38,618
With a disability	\$23,319	\$27,552
No disability	\$38,506	\$39,555

Source: U.S. Census Bureau, 2012 and 2017 American Community Survey 1-Year Estimates

TABLE 6 - Marital and Family Status

Household Type	All Households		White		African-American		Asian		Hispanic	
	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017
Married-Couple Family	59%	59%	60%	60%	30%	29%	77%	77%	59%	58%
Male Householder, No Wife Present	4%	4%	2%	3%	4%	4%	4%	2%	10%	10%
Female Householder, No Husband Present	11%	11%	8%	9%	33%	29%	7%	4%	17%	17%
Householder Living Alone	22%	22%	25%	23%	28%	33%	10%	14%	10%	10%
Householder Not Living Alone	4%	4%	4%	5%	5%	4%	2%	3%	5%	4%

Source: U.S. Census Bureau, 2012 and 2017 American Community Survey 1-Year Estimates

TABLE 7- Poverty Status by Household

	White		African American		Asian		Hispanic		All	
	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017
At or above poverty level	94%	95%	77%	78%	96%	95%	82%	89%	91%	93%
Below poverty level	6%	5%	23%	20%	4%	5%	18%	11%	9%	7%

Source: U.S. Census Bureau, 2012 and 2017 American Community Survey 1-Year Estimates

TABLE 8 - Percentage of Households in Income Range of All Households

Race	Total		<\$10,000		\$10,000- \$14,999		\$15,000- \$19,999		\$20,000- 24,999		\$25,000- 29,999		\$30,000- 34,999		\$35,000- 39,999		\$40,000- 44,999	
	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017
White	80%	78%	65%	65%	69%	59%	73%	69%	73%	64%	65%	66%	70%	84%	70%	67%	75%	81%
Black	8%	7%	26%	18%	20%	35%	14%	13%	14%	13%	11%	10%	12%	4%	11%	10%	9%	13%
Asian	6%	7%	4%	8%	4%	5%	2%	3%	4%	6%	4%	5%	6%	1%	6%	4%	4%	1%
Native Hawaiian or Other Pacific Islander	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%
American Indian/Alaskan Native	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%
Other Race	5%	6%	3%	7%	6%	0%	8%	13%	6%	14%	16%	19%	11%	9%	11%	16%	9%	5%
Two or More Races	1%	1%	0%	3%	0%	1%	2%	2%	2%	1%	2%	1%	1%	0%	1%	4%	2%	0%
Hispanic	15%	16%	11%	18%	17%	13%	21%	23%	26%	23%	31%	29%	30%	26%	30%	34%	27%	17%

Source: U.S. Census Bureau, 2012 and 2017 American Community Survey 1-Year Estimates

TABLE 8 - Percentage of Households in Income Range of All Households

Race	Total		\$45,000– \$49,999		\$50,000– \$59,999		\$60,000– \$74,999		\$75,000– \$99,999		\$100,000– \$124,999		\$125,000– \$149,999		\$150,000– \$199,999		\$200,000 or more	
	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017
White	80%	78%	76%	75%	76%	72%	81%	77%	81%	80%	85%	78%	85%	83%	86%	84%	91%	87%
Black	8%	7%	10%	11%	8%	8%	7%	10%	5%	5%	5%	5%	5%	4%	4%	3%	1%	1%
Asian	6%	7%	4%	1%	5%	5%	6%	5%	7%	8%	6%	10%	8%	9%	8%	11%	7%	11%
Native Hawaiian or Other Pacific Islander	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%
American Indian/Alaskan Native	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%	<1%
Other Race	5%	6%	8%	9%	9%	11%	5%	7%	6%	6%	3%	5%	2%	3%	1%	2%	0%	1%
Two or More Races	1%	1%	1%	3%	2%	2%	1%	1%	1%	2%	1%	1%	1%	1%	1%	1%	1%	1%
Hispanic	15%	16%	26%	25%	23%	26%	17%	17%	14%	18%	9%	15%	8%	10%	5%	7%	3%	3%

Source: U.S. Census Bureau, 2012 and 2017 American Community Survey 1-Year Estimates

TABLE 9 - Percentage of Households in Income Range of Households within Race

Race	<\$10,000		\$10,000-\$14,999		\$15,000-\$19,999		\$20,000-24,999		\$25,000-29,999		\$30,000-34,999		\$35,000-39,999		\$40,000-44,999	
	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017
White	3%	4%	2%	2%	3%	2%	3%	3%	3%	3%	3%	3%	3%	3%	3%	3%
Black	14%	10%	7%	11%	6%	5%	6%	6%	5%	4%	5%	2%	5%	5%	4%	6%
Asian	2%	4%	2%	2%	2%	1%	2%	3%	2%	2%	3%	1%	3%	2%	2%	1%
Native Hawaiian or Other Pacific Islander	0%	26%	0%	0%	0%	0%	0%	0%	0%	0%	0%	10%	0%	0%	0%	0%
American Indian/Alaskan Native	9%	3%	3%	1%	6%	8%	2%	15%	2%	3%	5%	3%	2%	4%	10%	6%
Other Race	2%	5%	3%	0%	4%	6%	4%	8%	11%	10%	8%	5%	7%	9%	6%	2%
Two or More Races	7%	9%	4%	2%	5%	5%	5%	2%	6%	2%	2%	0%	5%	11%	5%	0%
Hispanic	6%	5%	4%	2%	3%	4%	7%	5%	7%	6%	9%	5%	6%	8%	8%	3%

Source: U.S. Census Bureau, 2012 and 2017 American Community Survey 1-Year Estimates

TABLE 9 - Percentage of Households in Income Range of Households within Race

Race	\$45,000– \$49,999		\$50,000– \$59,999		\$60,000– \$74,999		\$75,000– \$99,999		\$100,000– \$124,999		\$125,000– \$149,999		\$150,000– \$199,999		\$200,000 or more	
	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017	2012	2017
White	3%	3%	7%	5%	9%	10%	14%	13%	11%	10%	8%	8%	10%	11%	14%	17%
Black	4%	5%	7%	6%	8%	13%	9%	9%	7%	8%	5%	4%	5%	4%	2%	2%
Asian	2%	0%	6%	4%	9%	7%	16%	13%	11%	14%	10%	9%	12%	14%	14%	23%
Native Hawaiian or Other Pacific Islander	0%	0%	0%	8%	12%	0%	0%	56%	0%	0%	0%	0%	0%	0%	88%	0%
American Indian/Alaskan Native	11%	4%	19%	16%	13%	4%	11%	8%	2%	8%	4%	6%	0%	5%	0%	5%
Other Race	5%	5%	12%	10%	9%	11%	16%	11%	5%	9%	3%	4%	1%	3%	1%	2%
Two or More Races	3%	8%	11%	7%	11%	8%	14%	16%	6%	9%	5%	7%	6%	5%	5%	9%
Hispanic	8%	5%	11%	9%	8%	11%	10%	14%	5%	10%	4%	5%	2%	4%	2%	3%

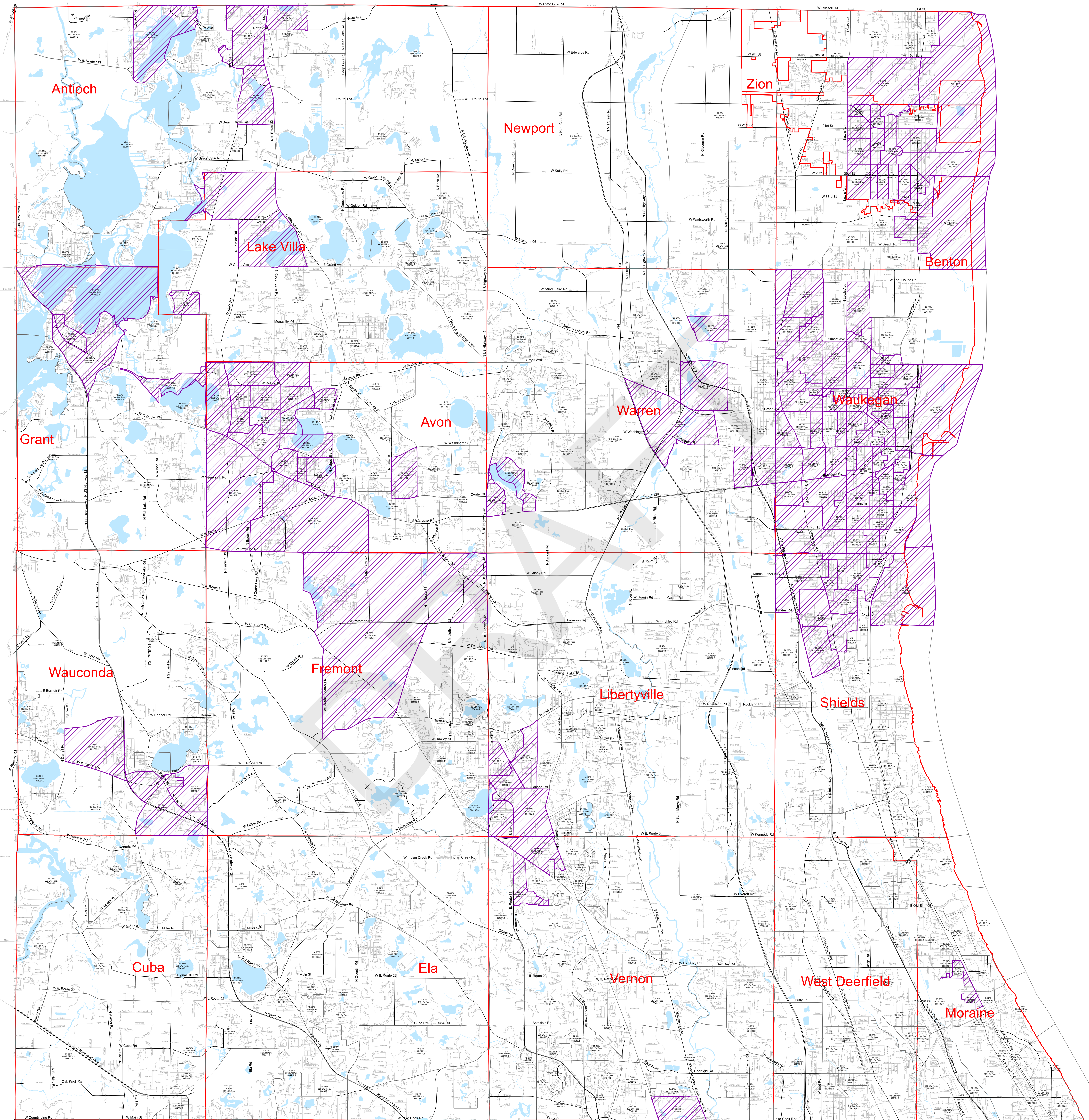
Source: U.S. Census Bureau, 2012 and 2017 American Community Survey 1-Year Estimates

Appendix C
Demographic and Housing HUD CPD Maps

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Lake County HUD Qualifying Low/Moderate Income Block Groups

The mapped boundaries of the US Census geography do not align with County data.
Please confirm eligibility with Community Development staff.

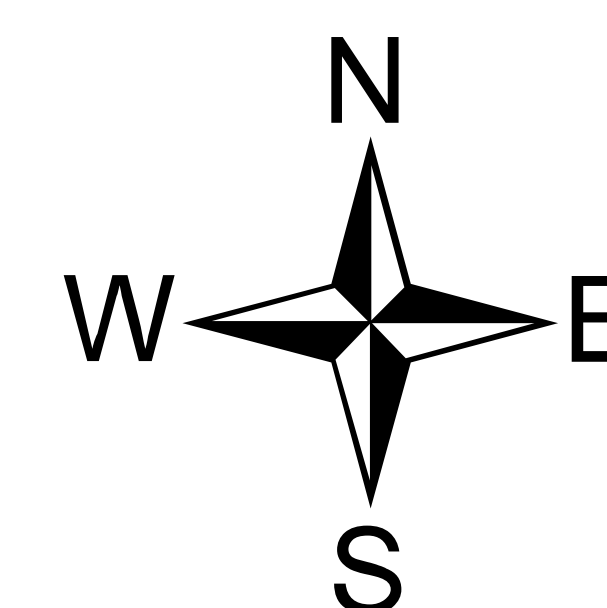


Percent Low and Moderate Income

0.0% - 46.82%

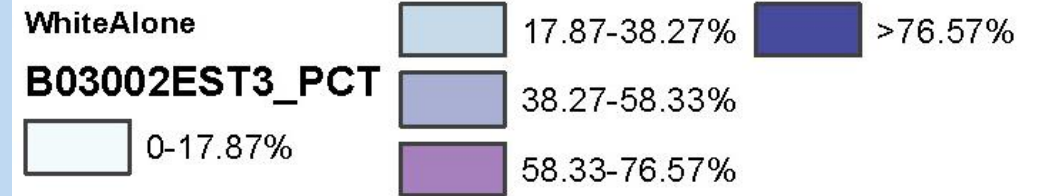
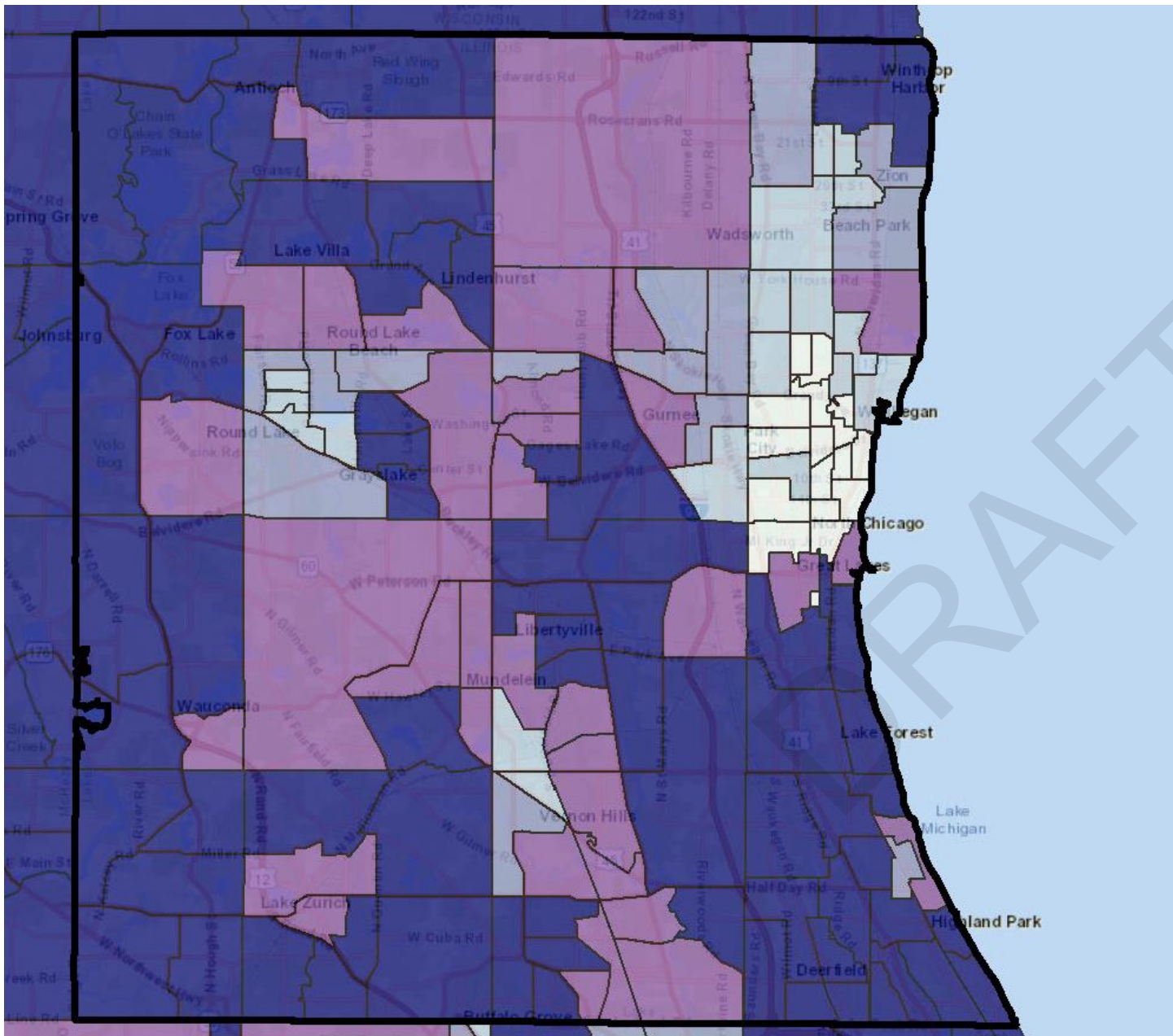
46.83% - 100%

Exception Criteria: 46.83% Low and Moderate Population



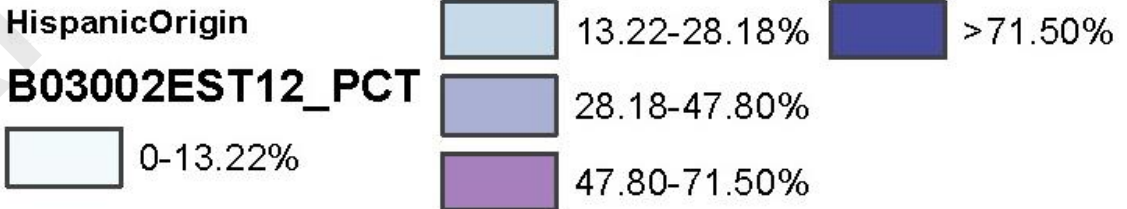
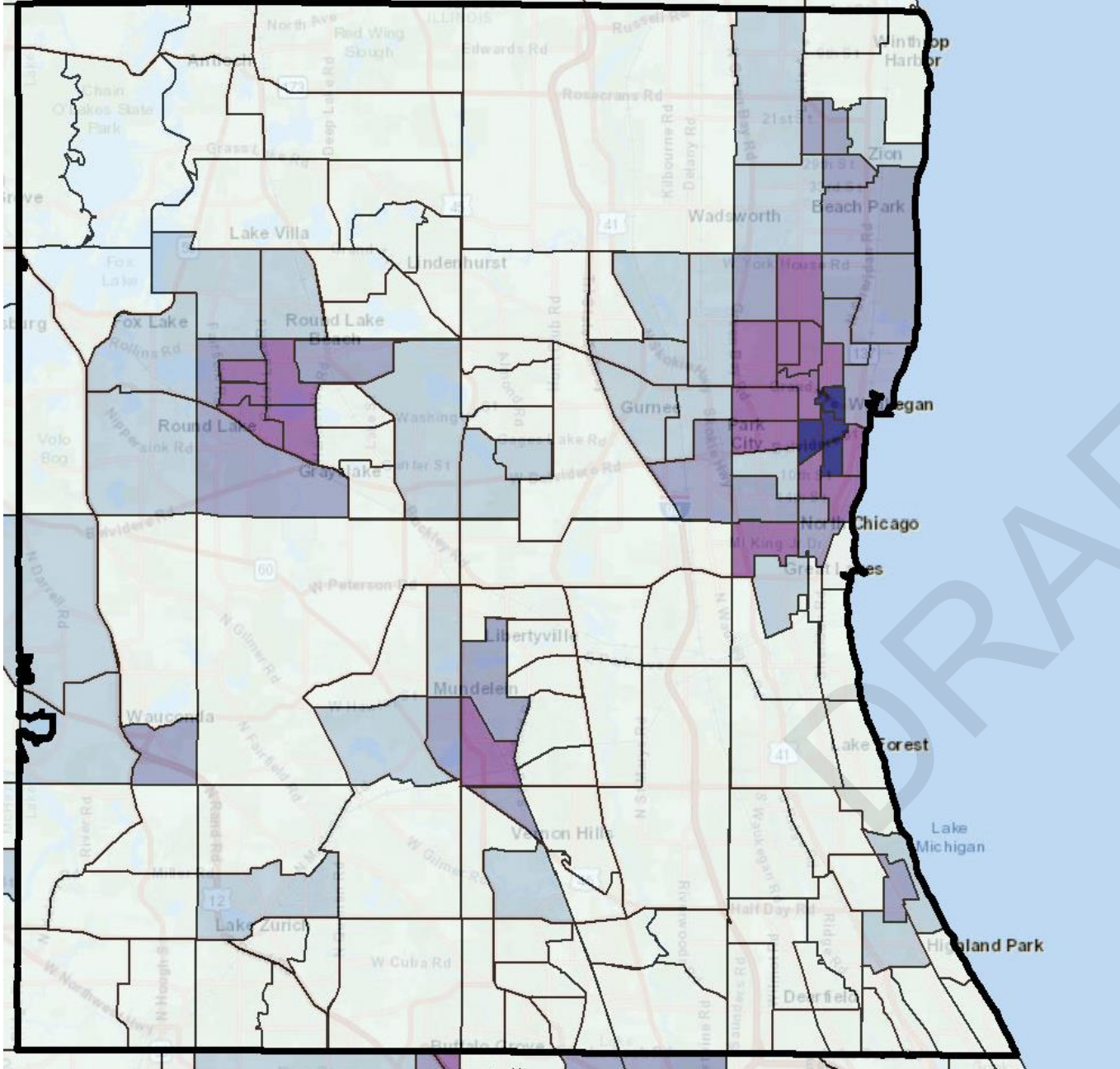
0 1 2 4 6 8 Miles

Lake County White Population



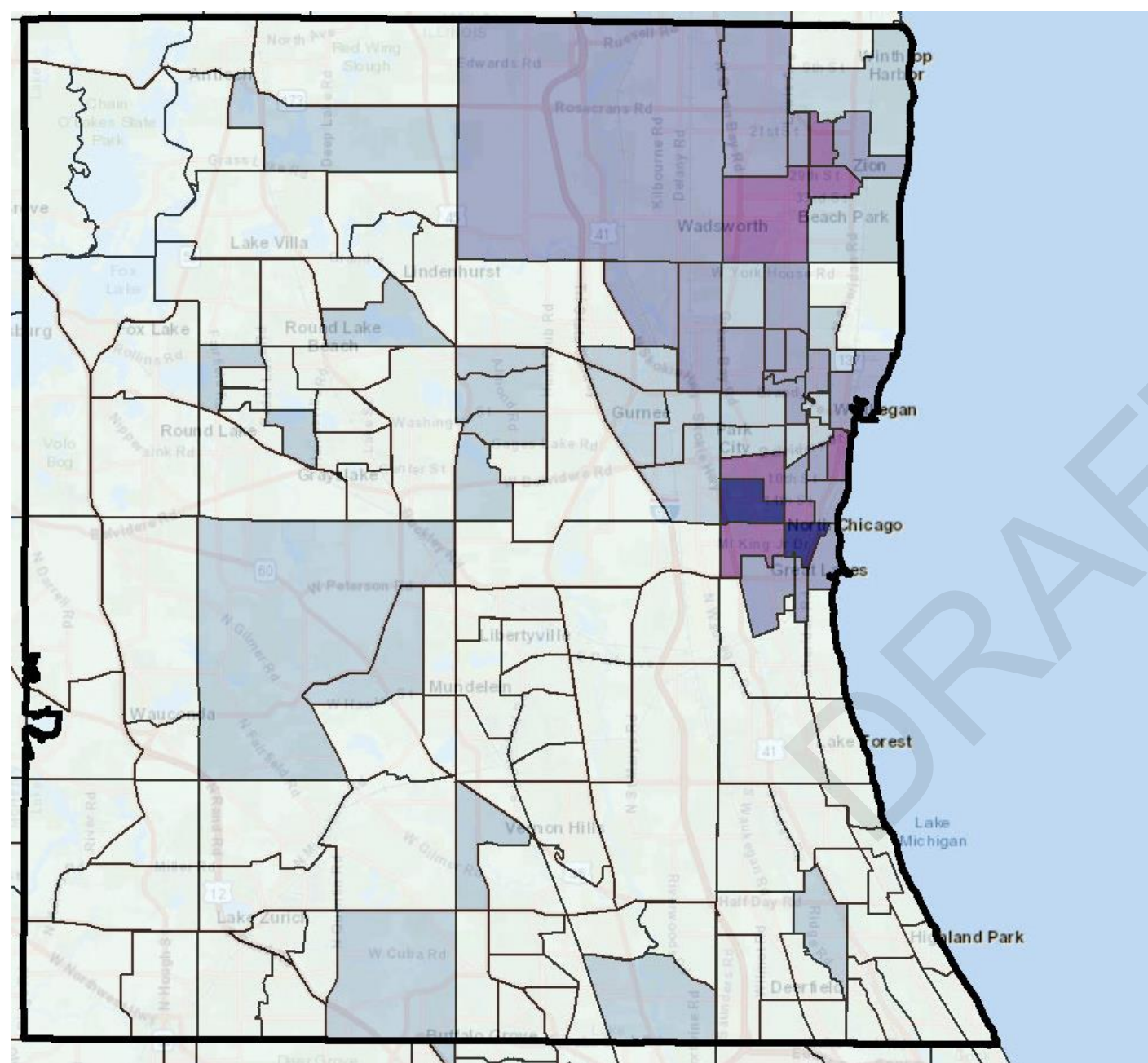
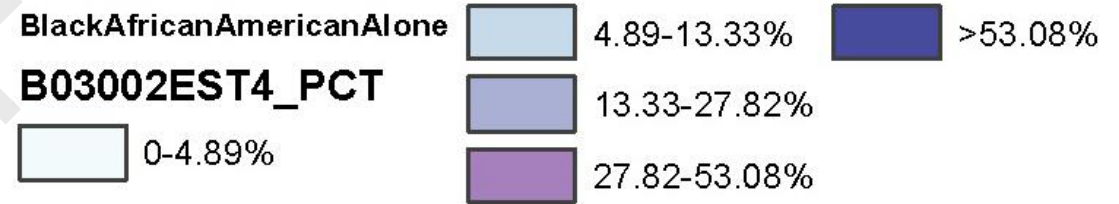
Source: HUD CPD Maps

Lake County Hispanic Population



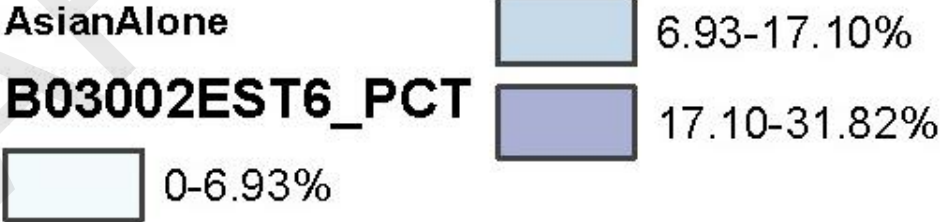
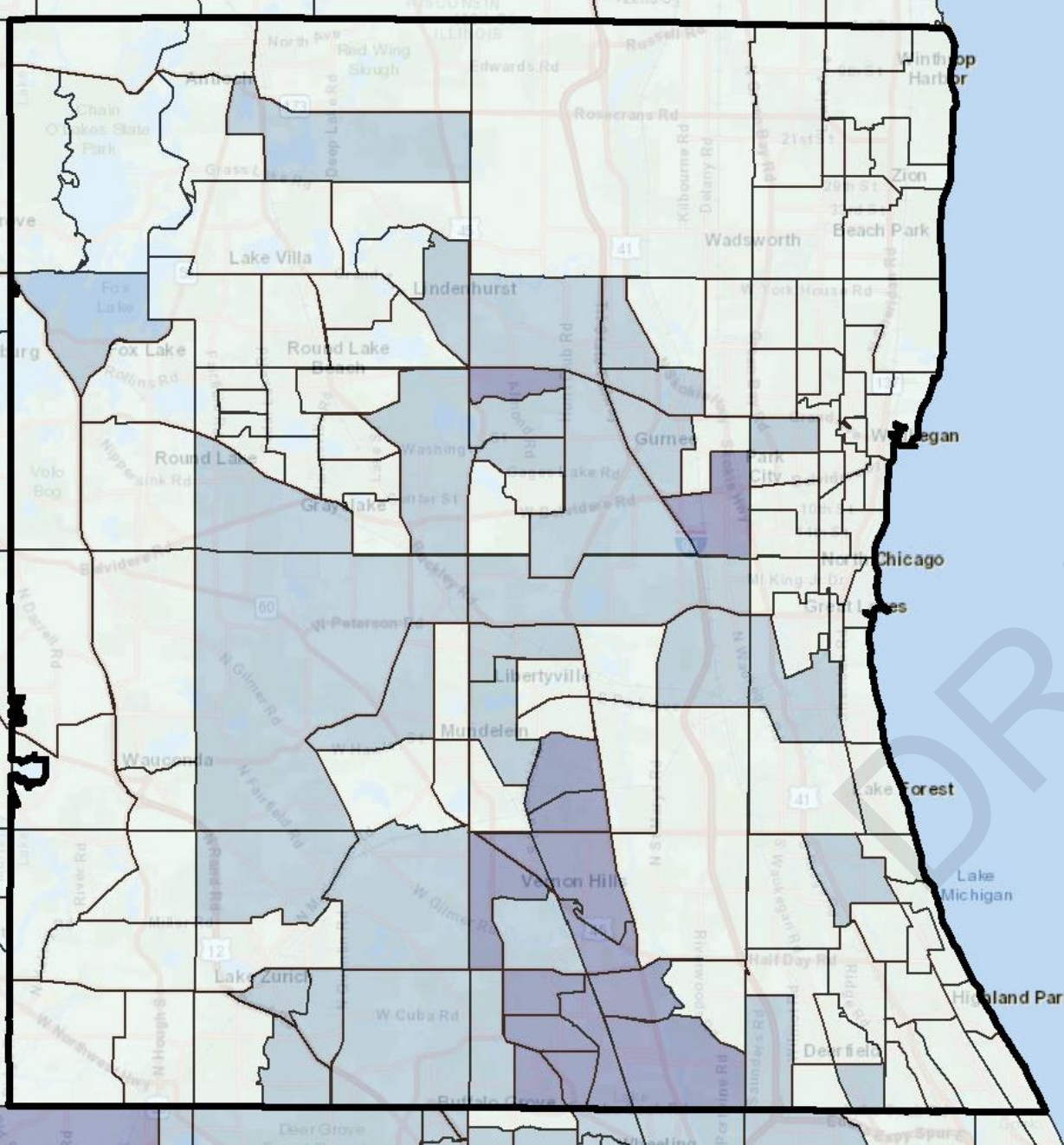
Source: HUD CPD Maps

Lake County African American Population



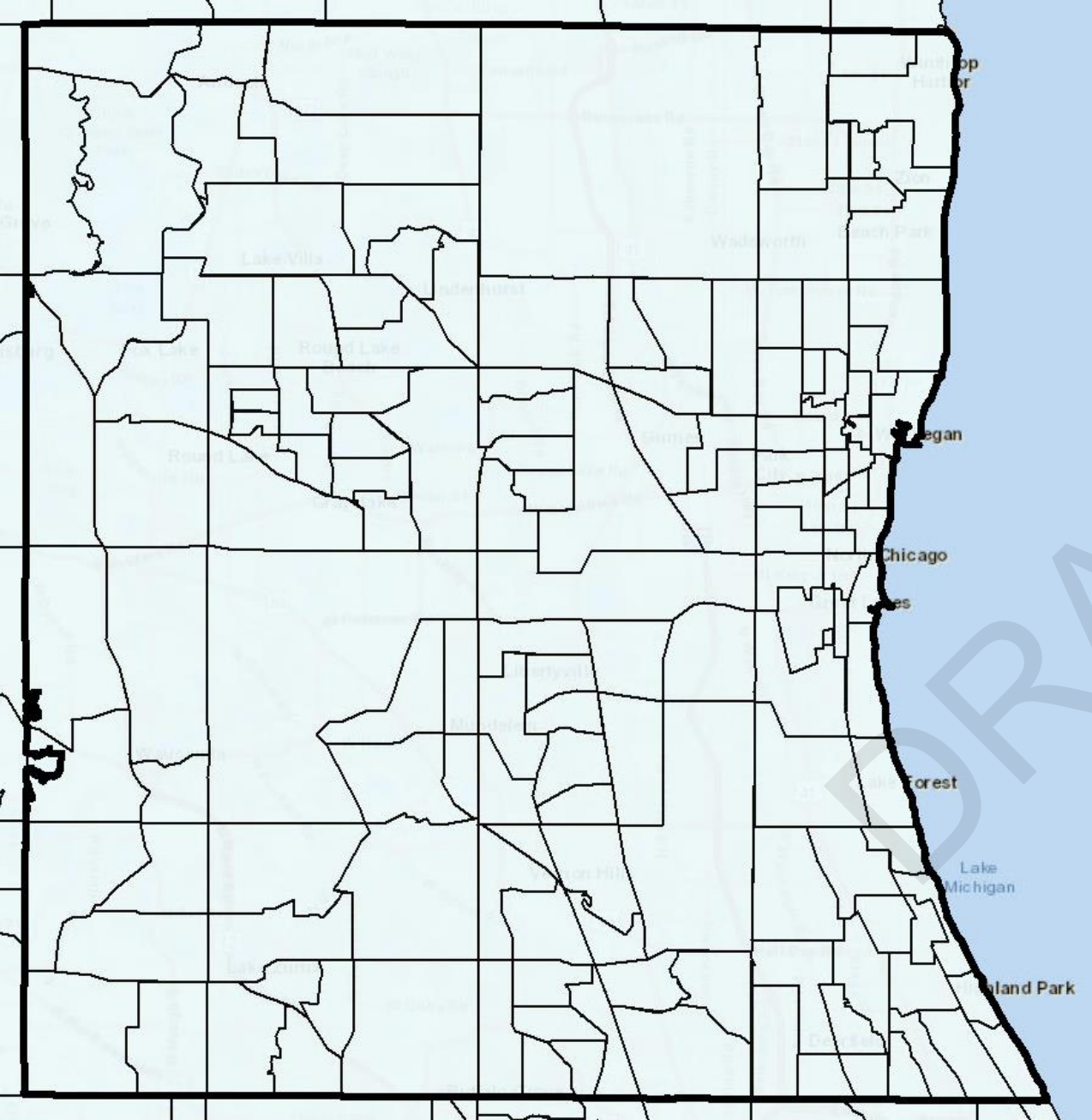
Source: HUD CPD Maps

Lake County Asian Population



Source: HUD CPD Maps

Lake County American Indian, Native Hawaiian, Alaska Native and Other Pacific Islander Population



NativeHawaiianPacificIslanderAlone

B03002EST7_PCT

0-2.28%

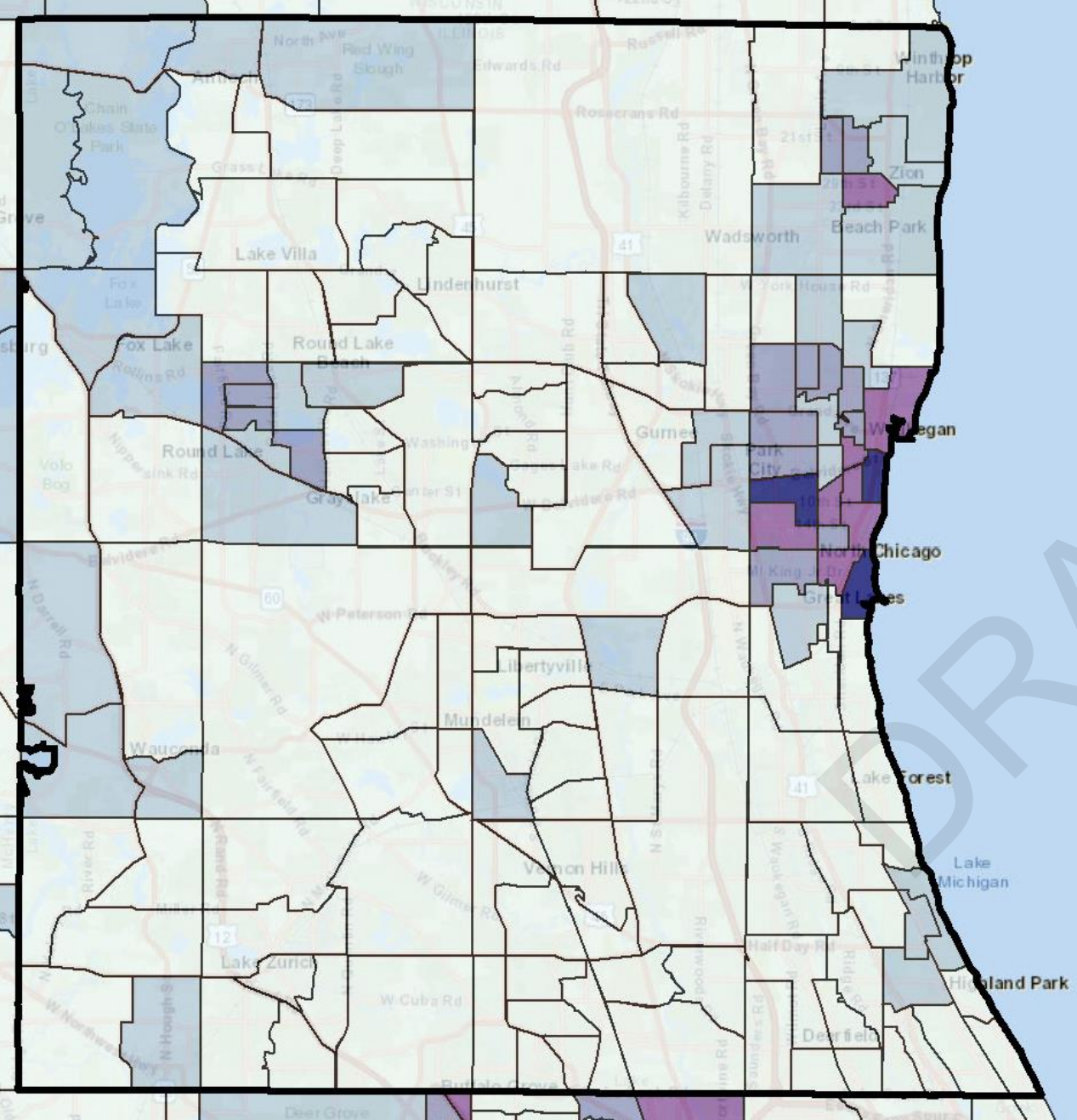
AmericanIndianAlaskaNativeAlone

B03002EST5_PCT

0-2.48%

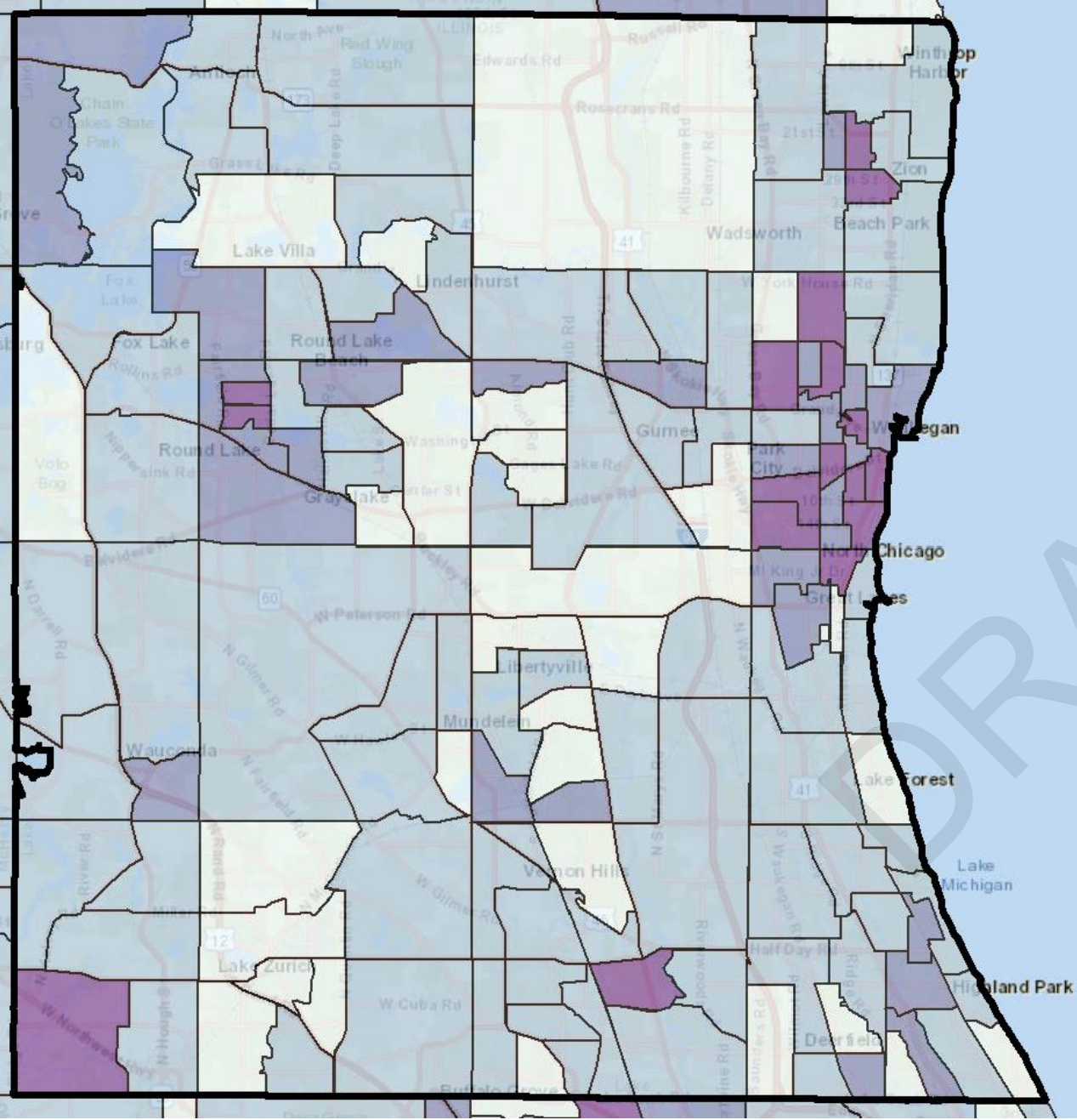
Source: HUD CPD Maps

Poverty Concentration



Source: HUD CPD Maps

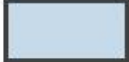
Housing Affordability



HousingCostBurden

B25106_CB_PCT

0-29.28% Paying>30%



29.28-38.78% Paying>30%



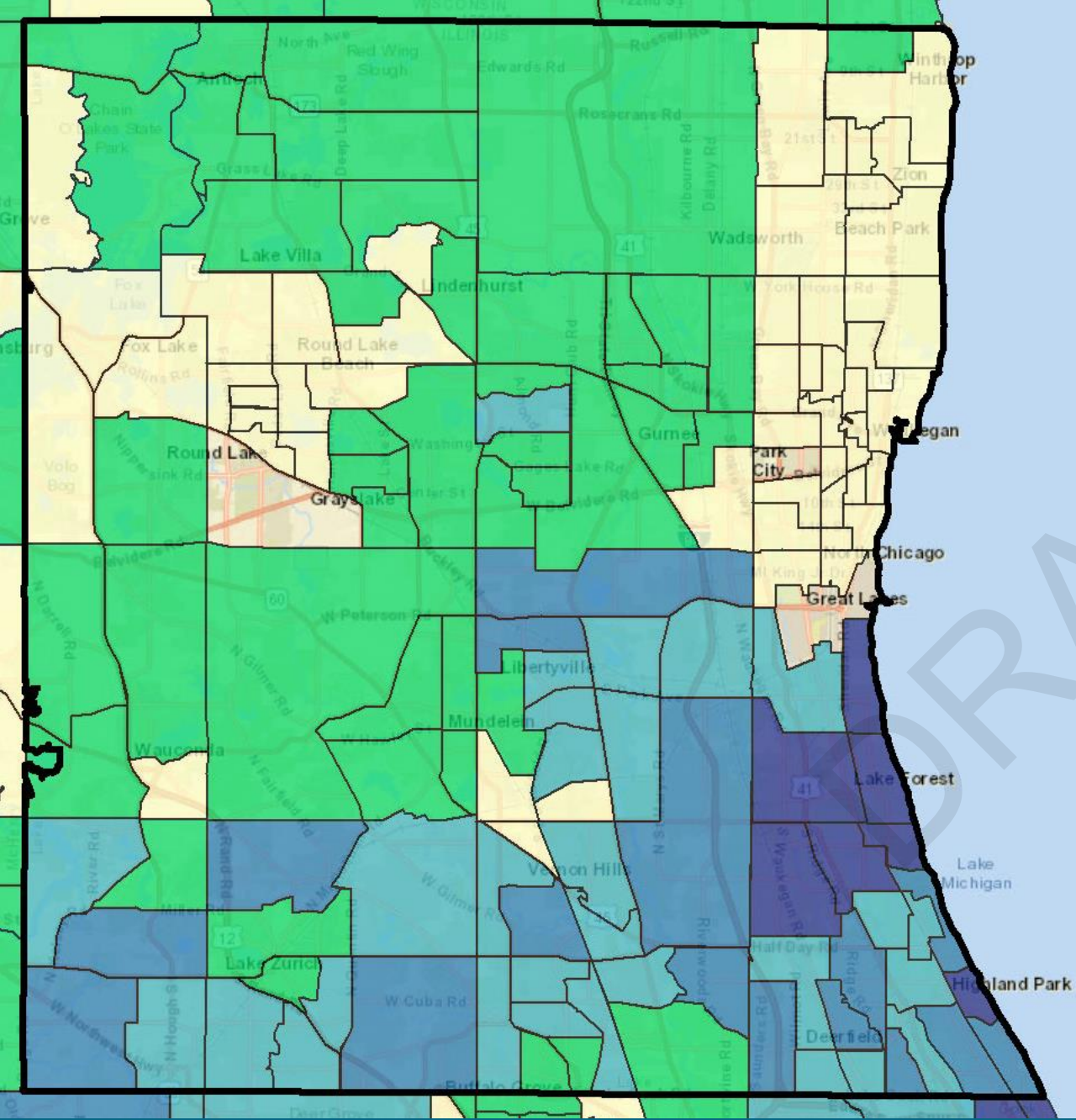
38.78-47.69% Paying>30%



47.69-58.44% Paying>30%

Source: HUD CPD Maps

Median Home Values



MedianHomeValue
B25097EST1

\$0-\$181,300.01

\$181,300.01-\$321,800.01

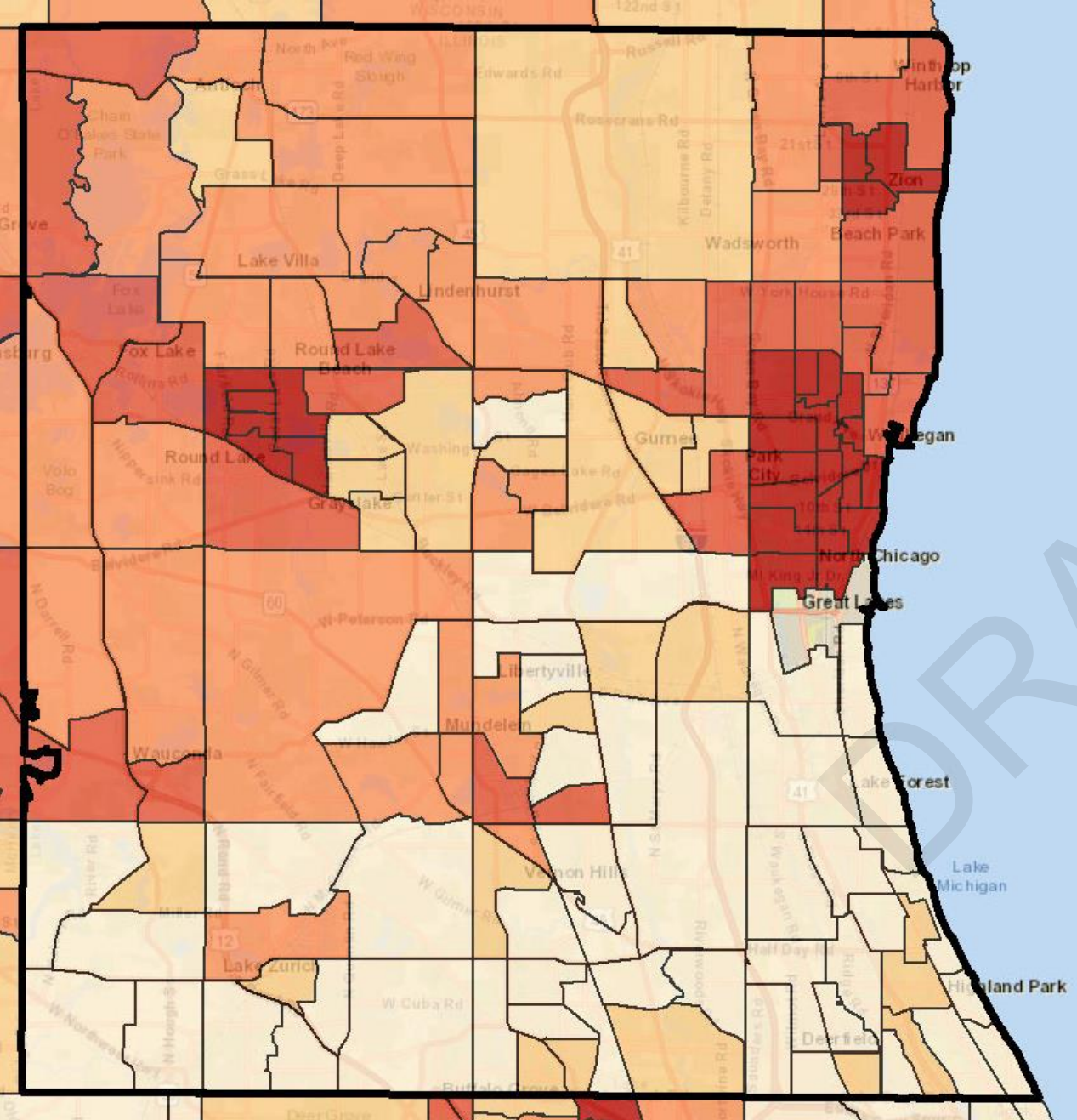
\$321,800.01-\$502,500.01

\$502,500.01-\$769,400.01

>\$769,400.01

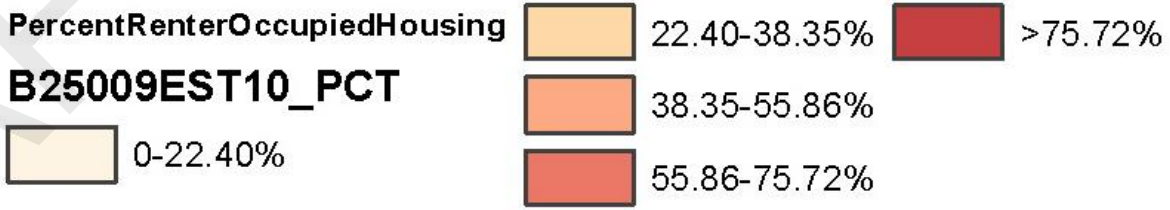
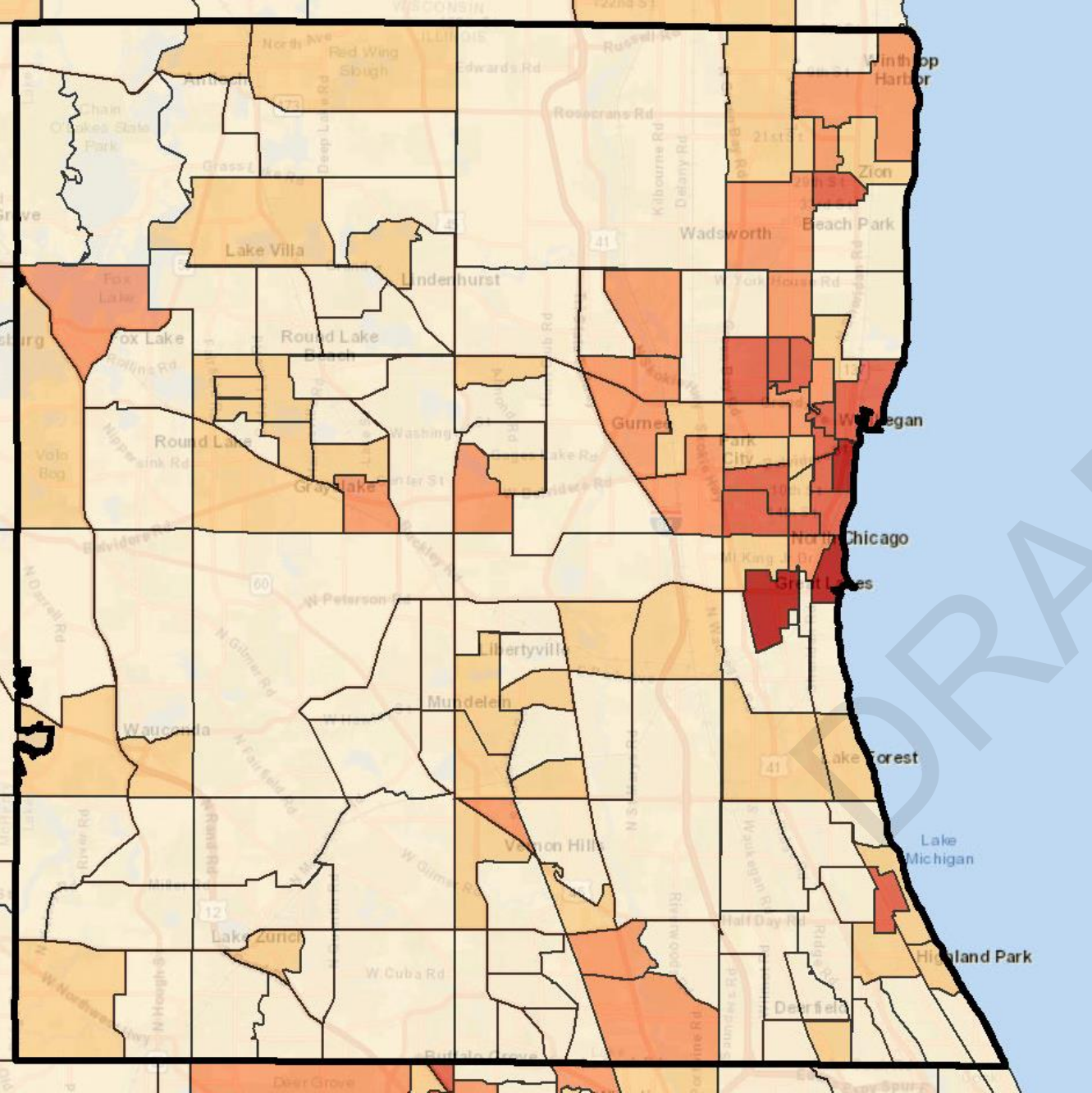
Source: HUD CPD Maps

Home Ownership Availability (100% AMI)



Source: HUD CPD Maps

Percent Rental Occupied Housing



Source: HUD CPD Maps

Appendix D
Lake County Fair Housing Complaints (2015 to 2018)

State & Federal Fair Housing Complaints Filed in Lake County

Year	HUD	IDHR
2014	26	11
2015	14	26
2016	2	9
2017	7	4
2018	9	8
2019	0	3

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FAIR HOUSING CASES

List of protected classes
involved in cases per year

	2015	2016	2017	2018	Total
Total unduplicated	69	53	100	124	346
Disability	47	39	65	49	200
Race	10	7	9	7	33
Familial status	5	5	10	4	24
National Origin	7	4	6	3	20
Sex	4	2	4	4	14
Criminal History	7	0	2	3	12
Color	3	3	2	2	10
Order of protection status	1	2	5	1	9
Religion	3	3	0	1	7
Source of income	3	1	1	0	5
Sexual orientation	2	2	0	1	5
Marital status	1	1	0	0	2
Military Status	0	1	0	0	1

FAIR HOUSING CASES

List of protected fair housing
issues by issue/violation

	2015	2016	2017	2018	Total
Reasonable Accommodation issue	35	37	57	42	171
Discriminatory Refusals to Rent	23	15	25	12	75
Discriminatory Terms, Conditions, Services or Facilities	15	15	10	7	47
Coercion or Intimidation, Interference or Retaliation	10	7	11	13	41
Discriminatory Advertising, Notices or Statements	8	5	4	3	20
Reasonable Modification issue	4	0	0	0	4
Discriminatory Lending or Financing	2	0	0	0	2
False denial or representation of availability	1	1	1	0	3
Design and Construction issues	1	0	0	1	2
Zoning	0	0	1	1	2

FAIR HOUSING CASES

List of protected fair housing
provider types

	2015	2016	2017	2018	Total
Management Company	14	14	46	27	101
Owner	26	19	19	12	76
Public Housing Authority	15	4	13	18	50
Condominium Association	3	9	7	3	22
Manager	2	7	3	2	14
Municipality	2	2	5	2	11
Neighbor	3	0	0	2	5
Broker	1	0	1	1	3
Lender	1	0	0	0	1
Newspaper/other Publisher	1	0	0	0	1
Nonprofit	1	0	0	0	1
Other	0	1	0	0	1

OTHER HOUSING CASES

List of housing issues managed by Fair Housing team not necessarily implicate fair housing laws

	2015	2016	2017	2018	Total
Termination of tenancy or subsidy	16	7	13	10	46
Section 8 Housing Choice Voucher	16	5	10	6	37
Tenant's rights & responsibilities	14	14	5	2	35
Non-renewal of lease	12	8	9	3	32
Admission to housing	16	1	11	3	31
Habitability	8	10	4	0	22
Lease violation	6	5	6	3	20
Quiet enjoyment	7	4	5	4	20
Non-payment of rent	6	3	7	3	19
Subsidized housing	10	2	1	3	16
Security Deposit	4	4	1	1	10
Utilities	5	1	0	1	7
Accounting/dispute re: balance of rent owed	3	0	0	0	3
Other	0	0	1	1	2
Foreclosure	0	1	0	0	1

Appendix E
2014 Impediments Addressed

#	2014 Impediment Addressed	Accomplishment(s)
2	The County has not developed a fair housing policy statement	Lake County adopted a Fair Housing Policy Statement (Attachment G) in December 2019.
5	There is not a dedicated County staff person responsible for fair housing	Lake County's Fair Housing Policy Statement (Attachment G) clearly delegated fair housing responsibilities to the Community Development Administrator.
6	There is not a long-term process in place for receiving and addressing housing discrimination complaints.	Lake County provides CDBG funding to a fair housing service provider such as Prairie State Legal Services to receive and address housing discrimination complaints.
7	There is limited information on fair housing on the County website.	Lake County's website (www.lakecountygov.il) now contains fair housing information, resources and referrals.
8	The County government does not maintain a comprehensive log of incidents of discrimination.	Lake County provides CDBG funding to a fair housing service provider such as Prairie State Legal Services to compile and review housing discrimination complaints filed with HUD and/or the Illinois Department of Human Rights (IDHR) – see Table 6 below.
9	HUD funding applicants are not required to provide information on the applicants' efforts to affirmatively further fair housing.	Beginning with the 2015 grant funding cycle, the Lake County Housing & Community Development Commission (HCDC) required municipal applicants to demonstrate efforts to affirmatively further fair housing. Please see Appendix E for further detail on the application scoring bonus training materials provided to local municipalities.
10	In general, the County lacks initiatives that affirmatively further fair housing.	Lake County aggressively invested both federal and local housing grant funds in fair housing support and affordable housing in high opportunity areas. The Lake County Housing & Community Development Commission (HCDC) implemented its priority of affirmatively furthering fair housing in the scoring system used to award housing grant dollars as seen here: http://www.lakecountyil.gov/DocumentCenter/View/25254/PY2019-Affordable-Housing-Project-Guidelines-PDF

Appendix F: Training Materials on AFFH Scoring Bonus for Local Municipalities Applying for CDBG Funding

25 Points: Robust policies & practices that affirmatively further fair housing



Laurel Court, courtesy of Fulton Developers

HIGHLAND PARK’S INCLUSIONARY HOUSING PROGRAM

1. What is “inclusionary housing”?

Inclusionary housing, also known as inclusionary zoning, is a tool that helps create housing opportunities for people at a variety of income levels. It requires developers to include a specified portion of affordable units alongside the market-priced units in any new housing development that is covered by the ordinance.

20 Points: Fair housing policy/ ordinance

§ 46-31 ZONING CODE

Sec. 46-31. *Contracts.*

All persons who receive a contract from the city for the furnishing of goods, merchandise, supplies, materials and the like shall, prior to payment of the city, submit proof in the form of a statement or affidavit that they have complied with section 2-105 of the Illinois Human Rights Act (Ill. Rev. Stat. ch. 68, § 2-105) as well as title VII of the 1964 Civil Rights Act (42 USC section 2,000 et seq.), and the Public Works Employment Discrimination Act (Ill. Rev. Stat. ch. 29, § 16.9 et seq.), dealing with equal employment opportunities. (Ord. No. 79-0-45, § 1, 9-19-79; Code 1969, § 2-106)

Secs. 46-53 – 46-60. *Reserved.*

ARTICLE III. FAIR HOUSING*

Sec. 46-61. *Definitions.*

The following words, terms and phrases, when used in this article, shall have the meanings ascribed to them in this section, except where the context clearly indicates a different meaning:

Real estate includes any building, structure or portion thereof in the city which is used or occupied, or is maintained, arranged or designed to be used or occupied, as a home, residence, sleeping place of one or more persons, place of business or office, but such term shall not include rooms for rental to one or two persons in a single-family dwelling, the remainder of which is occupied by the owner or members of his immediate family, or a lessee of the entire dwelling or members of his immediate family.

Real estate broker means any natural person, partnership, corporation or other entity, which for a consideration sells, purchases, exchanges, rents for others or negotiates to do any of the foregoing real property of another. (Code 1969, § 12-1202; Ord. No. 88-0-34, § 1, 6-4-68; Code 1969, § 8-2)

15 Points: Programs and/or Materials Valuing Diversity in Our Communities

Fair Housing Policy Statement

The Board of Directors of West Shore Park Corporation (WSP) fully support the following statement:

At West Shore Park, it is believed that its residents are the key component of the community. Each resident deserves to be welcome at all times regardless of race, color, national origin, religion, sex, physical or mental disability, familial status, marital status or any other classification protected by all applicable federal, state or local laws. WSP commitment to fair housing provides an opportunity for all people to call West Shore Park, HOME.

- Susan Frank, President - Block I
- James Melledy, Vice President - Block II
- Gina Rundall, Board Member - Block II
- Tabatha Curtis, Board Member - Block II
- Nicole Sullivan, Board Member - Block I

10 Points: Equal Opportunity Policy

5 Points: Increase Housing Choice

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FAIR HOUSING POLICY STATEMENT

Appendix G: Lake County Fair Housing Policy Statement

1. Purpose

As a County governmental authority undertaking housing activities, Lake County has an ethical and legal imperative to work aggressively to ensure housing programs funded and administered by the County comply with all local, state and federal fair housing laws, ordinances and executive orders that prohibit discriminatory housing practices, including: *Age Discrimination Act of 1975; Americans with Disabilities Act of 1990; Architectural Barriers Act of 1968; Civil Rights Act of 1964; Executive Order 11063, 12892, 13166; Housing and Community Development Act of 1974; Rehabilitation Act of 1973*; and the *Illinois Human Rights Act*. Lake County is committed to meeting this obligation and has developed this Fair Housing Policy to further that goal.

2. Statement

It is the policy of Lake County to promote fair housing opportunities and encourage racial and economic integration in its programs and housing development activities. Lake County is committed to equal housing opportunity for all persons, regardless of race, color, sex, age, religion, disability, national origin, ancestry, sexual orientation, marital status, military status, familial status, order of protection status, pregnancy, or arrest¹⁰ record in general and specifically in all programs and housing development activities funded or administered by Lake County. This shall be accomplished through strong external processes that provide access to all constituents to fair housing information and internal procedures that do not discriminate but affirmatively further fair housing.

3. Fair Housing Liaison

Per the Lake County 2014 Analysis of Impediments to Fair Housing Choice, the Community Development Administrator or his or her designee will function as a Fair Housing Liaison. The appointed person(s) understands the Fair Housing Laws and will attend applicable training to remain informed. The appointed person(s) is also responsible for scheduling staff training, facilitating information gathering and monitoring fair housing issues and concerns. The Fair Housing Liaison will review quarterly fair housing reports submitted by the County's fair housing program manager(s) and monitor the status of actions recommended in the Lake County Analysis of Impediments to Fair Housing Choice. It is the responsibility of the Fair Housing Liaison to carry out the following:

- a. **Annual State of Fair Housing Report** - The anniversary of the *Fair Housing Act* is recognized nationally each year during the month of April, at which time Lake County recommits to goals of eliminating housing discrimination and creating equal opportunity. To that end, the Lake County Community Development Administrator will deliver an annual *State of Fair Housing Report* to the Lake County Board during April of each year. The *State of Fair Housing Report* will note updated demographics and provide a consolidated description of housing discrimination complaints reported in the County. It will include complaints that are reported to Lake County fair housing agencies, the State of Illinois, and the U.S. Department of Housing and Urban Development (HUD). Fair housing issues identified in the community, such as in the newspaper, will also be recorded in the report.

¹⁰ A protected class in Illinois starting January 1, 2020



FAIR HOUSING POLICY STATEMENT

- b. **Fair Housing Funding** - Lake County will continue to provide Community Development Block Grant (CDBG) funding to fair housing groups to support the education, counseling and legal services they provide to local residents. Topics related to fair housing such as transportation and affordable housing will also be supported by CDBG funding.
- c. **Fair Housing Community Outreach** - Lake County seeks to participate in community-wide fair housing and outreach activities. To the greatest extent feasible, the Fair Housing Liaison will encourage Lake County's participation in community events to engage the broadest audience possible and gain community feedback regarding fair housing concerns.
- d. **Affirmative Marketing Program** - Lake County or any sub-recipient of Lake County housing grant funds will carry out an affirmative marketing program to attract prospective buyers or tenants of all majority or minority groups. All advertising for the sale or rental of housing in all programs and housing development activities funded or administered by the Lake County will indicate to the public that such housing is open to all persons and is designed to attract buyers and renters without regard to race, color, gender, age, religion, disability, national origin, ancestry, sexual orientation, marital status, military status, familial status, victims of sexual harassment, or being an individual with orders of protection. All brochures, circulars, billboards, direct-mail and other forms of advertising for the sale or rental of housing will include the official equal housing opportunity slogan or logotype. Lake County will include the Fair Housing Logo on all housing related documents and advertisements, and the HUD fair housing poster, which includes the *Code of Equal Opportunity in Housing*, is displayed in a prominent place in government offices. Lake County will also secure and distribute Fair Housing material provided by Fair Housing agencies and organizations.
- e. **Private Sector Role in Fair Housing** – To increase the supply of housing that is affordable to all racial and ethnic groups in Lake County, the Fair Housing Liaison (or designee) will develop partnerships with the private sector to expand the supply of affordable housing. This work includes working with developers to identify and to remediate the barriers to creating lower-cost-for-sale and rental housing.
- f. **Technical Assistance** – The Fair Housing Liaison will provide guidelines for zoning and building codes at county and municipal levels to increase equitable access to housing.

4. Reporting Possible Discrimination

Lake County is committed to providing safe, affordable, decent, and sanitary housing located in areas where people choose to live and to assuring equal housing opportunity and non-discrimination in all activities. Complaints pertaining to discrimination in any program funded or administered by Lake County or its sub-recipients may be filed with a local fair housing agency, the State of Illinois, or HUD.

- To file a complaint with a local fair housing agency, contact Prairie State Legal Services (PSLS) Fair Housing Program at 855-FHP-PSLS (855-347-7757), place a toll-free call at (800) 942-3940 or



FAIR HOUSING POLICY STATEMENT

apply for legal assistance on <https://www.pslegal.org/psls-apply-online.asp>. *PSLS can also help the public submit complaints, as appropriate, to the two entities below:*

- To submit a housing discrimination complaint with the Illinois Department of Human Rights (IDHR), call the IDHR Fair Housing Intake Investigator at (312) 814-6229 or email IDHR.FairHousing@illinois.gov.
- To file a complaint with HUD, place a toll-free call to (800) 669-9777 or TTY (800) 927-9275; complete the online complaint form available on <http://portal.hud.gov/hudportal/ HUD> ; or mail a completed complaint form or letter to: Office of Fair Housing and Equal Opportunity, Department of Housing & Urban Development, 451 7th Street, SW, Room 5204, Washington D.C. 20410-2000.

This information shall be publicly available at www.lakecountyil.gov. Alleged acts of fair housing discrimination by County employees or contractors are to be immediately brought to the attention of the Fair Housing Liaison. It is the policy of Lake County to cooperate in the investigation of fair housing complaints.

5. Internal Practices

- a. **Planning** – As stated in its November 9, 2004 Regional Framework Plan, Lake County shall “encourage a diverse variety of housing units to meet the needs of Lake County residents of different demographic groups and economic levels in a manner consistent with local planning objectives.” For purposes of this Policy Statement, this shall include meeting the housing needs of people with disabilities.
- b. **Training & Awareness** - Lake County will introduce fair housing training to relevant personnel, such as housing inspectors and planners in the Planning, Building & Development Department. Linkages between work under this Policy and broader diversity awareness and training initiatives in Lake County will be explored.

DATED, at WAUKEGAN, LAKE COUNTY, ILLINOIS on this 10th day of December, A.D. 2020.

Appendix H: Community Conversations on Race, Housing & Equity Since 2014

Potentially the most influential change since 2014, on the national level, was the release by the United States Census in 2018 of its “Opportunity Atlas,” an interactive mapping tool that “traces the roots of outcomes such as poverty and incarceration back to neighborhoods in which children grew up.” One of the key findings was that “moving to a better neighborhood earlier in childhood can increase a child’s income by several thousand dollars.”¹¹ Lake County’s profile in this atlas is contained in **Figure 1** below.

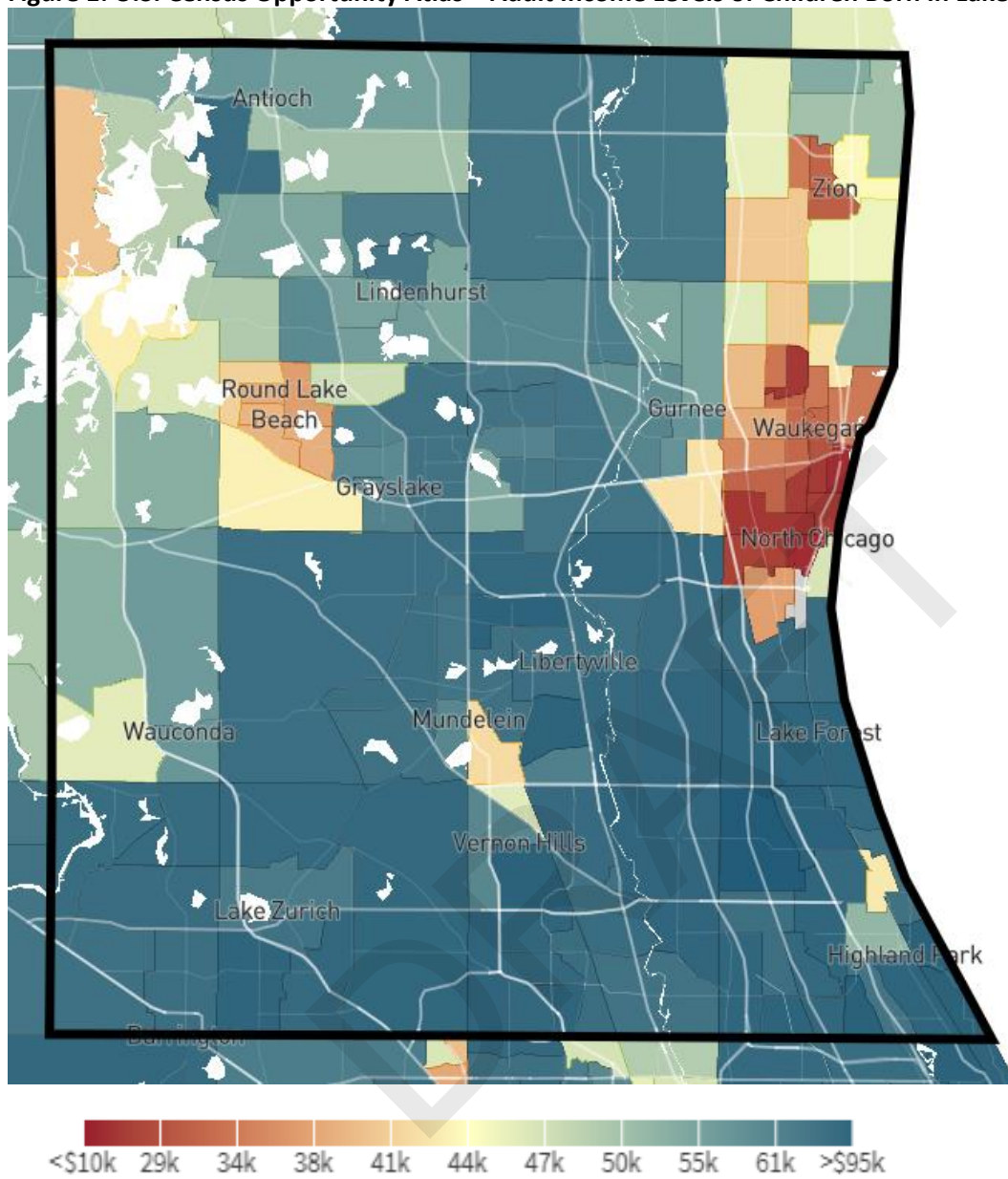
The **2014 AI** relied on a geography-based “opportunity” index for the Chicago region developed by Lukehart, Luce & Reece in a September 2005¹². This tool had demonstrated that poverty rates are nearly four times greater in low-opportunity areas and that opportunity is also highly skewed across racial groups. Since then, the United States Census in 2018 released its own “Opportunity Atlas,” a mapping tool that defined high opportunity census tracts across race, gender and income levels. The tool estimates outcomes (income, incarceration rate) based on where an individual grew up (census tracts) incorporating factors such as their parents’ income, the child’s race, and the child’s gender. Here is Lake County:

DRAFT

¹¹ www.opportunityinsights.org

¹² “The Segregation of Opportunities: The Structure of Advantage and Disadvantage in the Chicago Region” https://scholarship.law.umn.edu/imo_studies/2/

Figure 1: U.S. Census Opportunity Atlas – Adult Income Levels of Children Born In Lake County



In this **Figure 1** U.S. Census map, areas with colors ranging from light orange to dark red represent opportunity-challenged areas. These areas largely coincide with Lake County’s CDBG target areas – Fox Lake, Mundelein, North Chicago, Round Lake area, Waukegan and Zion.

Relevant to suburban areas like Lake County, the Urban Land Institute’s 2016 report, “Housing in the Evolving American Suburb,” noted that “considerable evidence indicates that zoning practices common in suburbs, and practiced in many cities as well, limit residential density and require multiple levels of local approval and thereby contribute to racial and economic segregation. Separate but related actions in 2015 by the U.S. Supreme Court and HUD to effectively strengthen fair housing enforcement and reporting by city and suburban areas that receive federal funding may result in challenges to such “exclusionary zoning” policies.”¹³

Locally, Chicago’s regional planning organizations broached new ground. In response to its 2015 study, “The Cost of Segregation¹⁴,” the Chicago Metropolitan Planning Council (MPC) released “Our Equitable Future: A Roadmap for the Chicago region” identifying 25 actionable policies and interventions that “better equip everyone living in our region to participate in creating a stronger future.”

While several “Roadmap” recommendations focus on important efforts outside of the scope of this document – such as education and criminal justice reform – the Roadmap does contain several recommendations that fit a Lake County AI strategy. The MPC strategies¹⁵ most relevant for community development priorities are listed here, some of which are included in new AI action steps proposed in this document:

1. Targeting economic development and inclusive growth:

- a. Invest equitably across the region. Recommendation: *Focus investment in targeted areas.*
- b. Make vacant lands an asset. Recommendation: *Build capacity among community-based organizations and suburban municipalities to enter into targeted land banking agreements with (local land banks) to redevelop vacant land.*
- c. Improve health through publicly funded development. Recommendation: *Any proposal seeking government-owned land or government money must detail the range of ways the proposed development will impact health in the surrounding community.*
- d. Use equity as a key measure for transportation planning efforts. Recommendation: *Adopt equity as a performance measure in planning and evaluating transportation services and investments.*
- e. Help local governments build capacity needed to thrive. Recommendation: *Develop tailored initiatives to increase municipal capacity, equipping smaller and lower-income communities.*

2. Creating jobs & building wealth

Make jobs accessible to low-income residents. Recommendation: *Pilot new transit services in the Chicago region to improve connectivity between job hubs and low-income communities with low employment. In addition, collaborate with workforce development service providers to determine transportation needs and address them. “The long commutes that result from workers seeking out affordable housing far from job centers place a drain on their families, their physical and mental well-being, and negatively impact the environment through increased gas emissions.”¹⁶*

¹³ <https://urbanland.uli.org/industry-sectors/residential/housing-evolving-u-s-suburbs3/>

¹⁴ <http://www.metroplanning.org/costofsegregation>

¹⁵ <https://www.metroplanning.org/uploads/cms/documents/cost-of-segregation-roadmap.pdf>

¹⁶ https://www.whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf

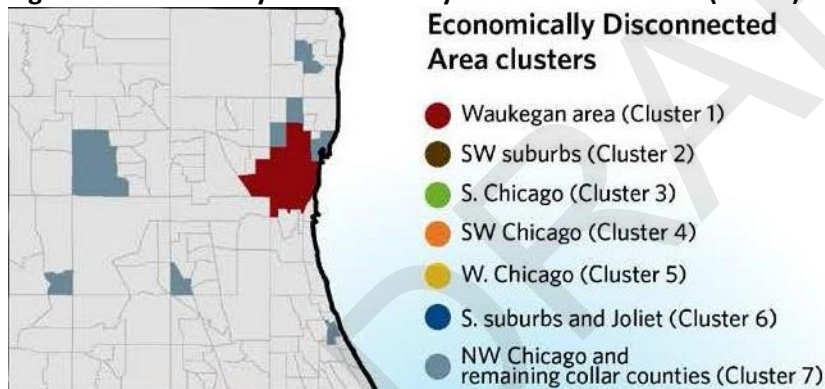
3. Building inclusive housing & neighborhoods

Expand homeownership opportunities. In Lake County this is accomplished by providing HOME subsidies as down-payment assistance to new homeowners and by converting vacant lots to infill development funded by Lake County HOME, CDBG and AHP dollars.

In July of 2017, CMAP published an Inclusive Growth strategy paper which outlined strategies on how to work toward a more inclusive economy. The paper identified “economically distressed areas” (EDAs) at the census tract levels defined as areas with a concentration of either; low-income households and minority population or low-income households and limited English proficiency (LEP) population.¹⁷

CMAP was able to group EDAs that are economically and demographically similar which revealed distinct patterns within the region. The grouping identified seven EDA clusters across the region, including one located in Lake County “Waukegan Area Cluster.” A firm understanding of the composition and economic makeup of these clusters present an opportunity to improve planning effort that support inclusivity. CMAP’s work on EDA clusters “highlights the need for collaborative efforts on inclusive growth that promote economic opportunity across the region via workforce, economic development, infrastructure investment, community building, and other comprehensive efforts that address the broad nature of lack of economic opportunity. Local economic development staff and workforce development programs must meet the needs of a changing and diversifying economy and promote growth of and access to jobs with pathways for upward mobility.”¹⁸

Figure 2: Lake County’s Economically Disconnected Areas (CMAP)



On October 10, 2018 CMAP adopted their regional comprehensive plan “On To 2050”. During the three-year planning process that included engaging over 100,000 residents across seven counties, CMAP identified three overarching principles: (1) Inclusive Growth, (2) Resilience and (3) Prioritized Investment. The plan specifically states that, “Regions that offer economic opportunity for residents regardless of race, income, or background enjoy longer, stronger periods of prosperity and fewer, shorter periods of stagnation.”¹⁹ Lake County acknowledges that it cannot fully prosper when large numbers of people and places are left behind.

In a broad sense, the national conversation about housing and poverty became more sophisticated, often containing insights about the role of race and ethnicity in housing and opportunity. America’s rental housing crisis made national headlines, causing government leaders to begin exploring local solutions. In its 2016 housing report, the Joint Center for Housing Studies at Harvard University projected that the percentage of

¹⁷ CMAP, On to 2050 Strategy Paper “Inclusive Growth” <https://www.cmap.illinois.gov/onto2050/strategy-papers/inclusive-growth>

¹⁸ CMAP, EDA Paper 1 <https://cmap.is/2W5p8H2> (retrieved 4.29.19)

¹⁹ <https://www.cmap.illinois.gov/2050/principles>

severely cost-burdened households will increase 11 percent by 2025.

Various academic studies have identified zoning and land-use planning as key contributors to lack of housing affordability. George Mason University reviewed the literature and found that most studies show that “both traditional land-use policies...increase the cost of housing.”²⁰

In 2017, the Yale Law Journal published valuable historical context explaining how past land use decisions resulted in “residential stagnation” of disenfranchised populations:

- “Before the 1970s, land-use restrictions (zoning laws, subdivision regulations, historic preservation, and so on) limited access to some towns or communities, usually rich suburbs. They did not, however, cap housing construction in entire metropolitan regions. Builders could always construct new housing, either in downtowns or on the urban fringe...” As a result, “states’ per capital GDPs were converging” as people left poor states like Mississippi to move to richer ones like Connecticut.
- “But starting in the 1970s, the combined effect of land-use restrictions in many of the richest metropolitan areas stopped that convergence in its tracks. Though doctors, lawyers and other high-skilled individuals who could afford the higher housing costs could still move to capture higher wages in richer, restrictive states, less-skilled workers could not.”²¹

In support of the proposed 2020-24 Consolidated Plan priority needs and goals, maps for use in the new five-year plan have been created that allow Lake County to mirror **Figures 1** and **2** above. Such maps reflect the **2019 AI** recommendation to continue the County’s two-pronged approach of targeting federal investment in improving low/moderate income communities while supporting affordable housing development in high opportunity areas. These Lake County maps for use in the 2020-24 Consolidated Plan are defined and contained in **Appendix I**.

²⁰ <https://www.mercatus.org/system/files/Ikeda-Land-Use-Regulation.pdf>

²¹ Schleicher, David. **The Yale Law Journal**. October 2017, Volume 127, Number 1, pp. 78 – 154.

Appendix I: Best Practices

NATIONAL EXAMPLES

- AARP Model Accessory Dwelling Unit (ADU)²² ordinance @ www.aarp.org/livablecommunities
- The White House's Housing Development Toolkit²³ recommends the following actions:
 - Establish by-right development
 - Tax vacant land or donate it to non-profit developers
 - Streamline or shorten permitting processes and timelines
 - Eliminate off-street parking requirements
 - Enact high-density and multifamily zoning
 - Allow accessory dwelling units
 - Establish density bonuses and/or inclusionary zoning
 - Establish development tax or value capture incentives
 - Use property tax abatements (to affordable housing during development stage)

REGIONAL EXAMPLES

- Please see Homes for Changing Region Toolkit @ www.metroplanning.org/homegrown
- **Village of Bolingbrook, IL.** In 2003, Bolingbrook passed an ordinance to codify "visitability" criteria:
 - A no-step entrance leading from the driveway to an entrance with a min 32-inch clear opening.
 - One accessible bathroom on the same level as the no-step entrance.
 - At least one shower in the home with reinforced beams to allow for the installation of grab rails if necessary, at a later date.
 - Exterior doorways at least 36 inches wide and interior doors with a min 32-inch clear opening.
 - Corridors and passageways 42 inches wide on the same level as the no-step entrance.
 - Electrical wall outlets placed no more than 15 inches above finished flooring.
 - Wall switches controlling light fixtures and fans placed 48 inches (max) above finished flooring.
- **Village of Bull Valley, IL.** In an effort to introduce affordable housing to a village principally comprised of large residential lots, Bull Valley created its first ADU. This ADU is a basement apartment into which the owner of the principal residence will move when she leases the main parts of the home to a tenant.

LOCAL EXAMPLES OF RESIDENTIAL ZONING CODE INNOVATION

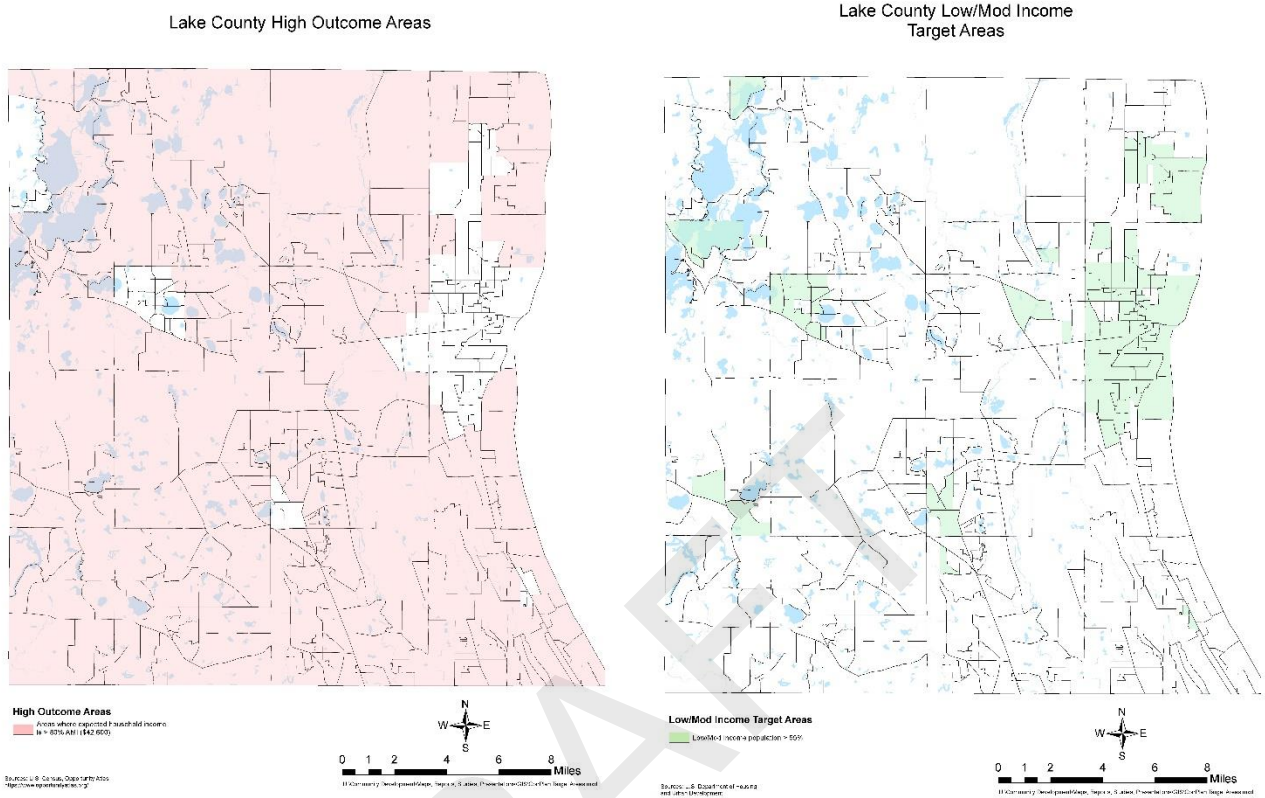
- **Lake County residential occupancy limit.** Lake County's definition of family includes "A group of not more than four (4) unrelated persons living together as a single housekeeping unit in a dwelling unit."
- **City of Evanston ADU.** City council voted on May 14, 2018 to allow rental of accessory dwelling units (ADU) with registration requirement.²⁴
- **Village of Park Forest, IL.** Park Forest allowed ADUs in Unified Development Ordinance (UDO). In a PUD of SF homes with an attached ADUs, five ADUs were permitted with deed restrictions requiring owner occupancy and parking requirements met in shared garage.
- **Village of Glenview, IL.** In the development of the Glen, a former naval station, one of several new neighborhoods contained ADUs. Glenview requires the homeowner to occupy one unit, the other of which may be rented. The Village has not encountered any issues with the rental units.

²² Accessory Dwelling Units (ADUs) are self-contained second dwelling units located within or attached to a principal single-family dwelling. The ADU is equipped with a kitchen, bathroom and sleeping area. ADUs are discreetly located and coordinated with the principal dwelling to preserve the neighborhood character.

²³ https://www.whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf

²⁴ <https://www.cityofevanston.org/Home/ShowDocument?id=46030>

Appendix J: Maps in 2020-24 Consolidated Plan for HUD



The maps above define two different types of target areas to be used in Lake County’s 2020-24 Consolidated Plan for HUD. These maps are substantially similar to Figure 1. U.S. Census Opportunity Atlas and Figure 2. Economically Disconnected Area Clusters contained above in Appendix G. These maps make it possible for potential applicants for Lake County’s HUD grants to select eligible sites. The goal of these maps are to prioritize HUD investment for strategic implementation of the action steps outlined here to address impediments to fair housing choice in Lake County.

Proposed Target Areas	Data Source	Use in 2020-24 Consolidated Plan
Lake County High Outcome Areas	U.S. Census Opportunity Atlas	High Outcome (pink) areas will receive preferential scoring in applications for affordable housing dollars.
Lake County Low/Mod Income Target Areas	U.S. Census & U.S. Department of Housing & Urban Development (HUD)	Low/Mod Income (green) areas are the only areas eligible for applications under the proposed “Prioritize Pathways for Upward Economic Mobility” goal.