



# 2025 – 2029 Housing & Community Development Consolidated Plan

July 8, 2025

## **Executive Summary MA-10**

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

#### **1. Introduction**

The intent of this county-wide Consolidated Plan is to identify housing and community development needs, goals, outcomes and strategies for Lake County, Illinois. It is also the intent of this document to implement, to the greatest extent possible, the goals of the Lake County Board's Strategic Plan. This document serves as a major component toward the official application to the U.S. Department of Housing and Urban Development (HUD) for funding from three current HUD grant programs: Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and the Emergency Solutions Grant (ESG) Programs for program years 2025 -2029.

Three jurisdictions in Lake County receive Community Development Block Grant (CDBG) funds under the entitlement allocation: Lake County, as an urban county, and the Cities of North Chicago and Waukegan, each as independent entitlements. These three CDBG jurisdictions regularly coordinate with one another and collaborate on planning and implementation of CDBG funded community development activities. The City of North Chicago – while retaining its entitlement status – has opted for its CDBG funding from the U.S. Department of Housing and Urban Development (HUD) – Community Planning and Development Office to be administered by Lake County in accordance with the Lake County Consolidated Plan. The Joint Agreement between Lake County and the City of North Chicago provides that North Chicago entitlement-funded activities under the 2025 – 2029 Housing and Community Development Consolidated Plan be pre-approved by the City of North Chicago prior to submission by Lake County to the U.S. Department of Housing and Urban Development. These three units of local government have also formed a HOME Consortium for the purposes of carrying out housing activities funded under the HOME Investment Partnerships Program. Lake County serves as the coordinating unit and Lead Agency for the administration of the Lake County Consortium. Lake County Community Development administers the HOME Program.

Lake County Community Development, in addition to administering HUD's Emergency Solutions Grant (ESG) program, serves as the collaborative applicant for Lake County's Continuum of Care. The Cities of North Chicago and Waukegan collaborate with Lake County on countywide homeless planning and support for homeless service and housing agencies.

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

The Program Year 2025-29 Consolidated Plan focuses on actions and investments that will support low- and moderate-income residents of Lake County. The following plan will advance progress within the following four goals:

1. Maximize Affordable Housing
2. Improve Homeless Crisis Response System
3. Enhance the living environment for the Lake County Low and Moderate Income (LMI) population
4. Program Administration

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

The priorities and goals of this ConPlan mimic the PY2020-24 ConPlan, with a focus on housing and homelessness. The continuation of an investment focus on affordable housing is not a result of past failures, rather it is a reflection of housing demand outpacing supply. The continuation of this strategy is a direct result of community needs assessment activities complete as part of this ConPlan process.

During the previous ConPlan cycle Lake County was successful in partnering with the Illinois Housing Development Authority (IHDA) in the development of affordable multifamily properties through the use of the Low-Income Housing Tax Credit (LIHTC). Additional success was in the support of homeownership through the Community Land Trust (CLT) and Down Payment Assistance (DPA) programs.

During Program Year 2024 (PY24), with support from Lake County, PADS Lake County was able to begin the process of developing a permanent fixed site shelter. Upon completion, the shelter will be a significant improvement to the homeless response system. The lack of shelter infrastructure has been a issue facing Lake County for years.

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

The PY25-29 ConPlan was completed in accordance with the Lake County Consortium Citizen Participation Plan (CPP). Following the public announcement a series of public meetings, including public hearings, were held. Each meeting allowed for public comment during the meeting as well as the ability for members of the public to submit comment via mail or email. The meeting schedule is summarized below, and all comments received are detailed in Table 4 – Citizen Participation Outreach.

06/12/2024 – Housing and Community Development Commission (HCDC) – Public Hearing  
07/10/2024 – Housing and Community Development Commission (HCDC) – Public Hearing  
10/22/2024 – Lake County Human Services PY2025 Grant Workshop  
10/22/2024 – Lake County Affordable Housing PY2025 Grant Workshop  
10/22/2024 – Lake County Public Improvement PY2025 Grant Workshop  
02/07/2025 – Public Services Advisory & Recommendation Committee (ARC)  
02/07/2025 – Affordable Housing Advisory & Recommendation Committee (ARC)  
02/19/2025 – Housing and Community Development Commission (HCDC) – Public Hearing  
02/25/2025 – Behavioral Health Advisory & Recommendation Committee (ARC)  
06/11/2025 – Housing and Community Development Commission (HCDC) – Public Hearing

## 5. Summary of public comments

Details of all the public comments received are included as the “Public Process” attachment to this plan. In additions the comments received are summarized below.:

07/10/2024 – Housing and Community Development Commission (HCDC) – Public Hearing

*Joanna Jaimes of Mano a Mano read her comments on the critical need for the Productive Parents Program. The need for the Productive Parents Program is more pressing than ever. Our community's demand for adult education services is growing at an unprecedented rate. From 2020 to 2024, the number of individuals attending our ESL classes increased by nearly 60%. Similarly, our job readiness training program saw an astonishing 128% increase in participation. These numbers highlight a significant and escalating demand for the services we provide, services that are essential for helping our community members acquire the skills they need to thrive in the workforce.*

*Rob Anthony of Community Partners for Affordable Housing (CPAH) said in terms of the 2025-2029 Consolidated Plan, as you know, the last one prioritized affordable housing, reporting that about thirty percent of homeowners and almost fifty percent of renters were housing cost burdened. Unfortunately, that situation has not changed dramatically. So clearly that lack of affordable housing continues to be one of the biggest problems in the region, which leads to housing instability, financial insecurity, negative impact of physical and mental health, diminished work and school performance.*

*Jennifer Yonan of Youth Conservation Corps (YCC) read the following: This year, YCC is celebrating our 50th year of serving youth in our community. YCC is an education and training program serving Opportunity youth ages 16 – 24 years old who are disconnected from school and from employment We strongly encourage the HCDC's Consolidated Plan for 2025- 2029 to focus on ensuring access to affordable housing and providing public transit for low- and moderate-income families and individuals in Lake County, IL*

*Greg Davenport of North Suburban Legal Aid Clinic said the North Suburban Legal Aid Clinic provides free legal service in the practice areas of housing and domestic violence. The lack of affordable housing leads to many of the clients in cases that we see. We provide support for tenants, so we are working with low-income tenants in the area. We help with eviction matters, tenant and landlord disputes, helping with subsidize housing and vouchers as well too.*

*Allen Swilley of PADS Lake County - Like most counties across the country, homelessness is increasing at an alarming rate, year over year. PADS Lake County is considered the ‘front door to the homeless services system’ and will be on the front lines over the next five years providing services to residents experiencing housing crises. Our data shows that the need for fixed shelter extends beyond the northeast region of the county and should be considered among Lake County decision makers.*

*Pat Davenport of A Safe Place comments: When considering the housing crisis Lake County is experiencing as a whole and how these conditions impact our domestic violence and human trafficking survivors, A Safe Place would like to emphasize the following focus for the county in the next 5 years.*

*Megan Brady, Prairie State Legal Services (PSLS) - The common thread for the current and ongoing needs we see from our community members is a lack of accessible, decent, affordable housing in Lake County. Specifically, PSLS identifies the following needs in our community; Lack of affordable housing; Habitability issues; Need for homelessness prevention programs; Lack of accessible housing for people with disabilities; Barriers to renting because of discriminatory practices; Financial assistance for security deposits, application fees, and moving expenses; and Temporary housing for renters experiencing a gap in housing.*

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

All comments received to date were accepted.

## **7. Summary**

Lake County's Consolidated Plan will serve as a guide for building affordable housing, supporting the homeless response system, and creating suitable living environments for the Lake County LMI population. The PY2025-29 ConPlan reflects the coordinated efforts of citizens, stakeholders, and partner agencies to achieve the goals in the Consolidated Plan. This work is in support of affirmatively furthering fair housing.

## The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	LAKE COUNTY	Community Development
HOME Administrator	LAKE COUNTY	Community Development
ESG Administrator	LAKE COUNTY	Community Development

**Table 1 – Responsible Agencies**

### Narrative

Lake County Community Development (LCCD) serves as the entity responsible for the preparation of the Consolidated Plan as well as the administration of CDBG, HOME, and ESG funds. LCCD is a division of the Lake County Planning, Building and Development (PBD) Department of Lake County Government. Direct oversight of LCCD is the responsibility of the Lake County Housing and Community Development Commission (HCDC). The standing County Committee is the Health and Community Services Committee (HCS). The Lake County Board (LCB) has ultimate oversight over program administration, including funding allocations.

### Consolidated Plan Public Contact Information

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

### **1. Introduction**

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

Lake County Community Development is committed to enhancing coordination with all agencies that serve Lake County's residents in need, including those in need of assisted housing or other supportive services. The County coordinated with community partners by collaborating on projects, participating in coalitions, and acting as a funder.

Lake County Community Development has a committed collaboration with the Lake County Coalition for the Homeless (local Continuum of Care), as well as participation in various groups and efforts of community partners to improve services for Lake County's residents. Lake County Community Development staff participate in meetings of the regular governmental and non-governmental health and service agency groups, such as the Lake County Alliance for Human Services and Live Well Lake County. Lake County Community Development plays a critical role in the newly developed Lake County's Attainable Housing Coalition, with the "Kickoff" summit taking place in July 2025.

Lake County consults with each of the three Public Housing Agencies (PHAs) in Lake County during the consultation and writing of the 5-year Consolidated Plan. In addition to these regular communications, special projects often require collaboration between the PHAs and the County. Public Housing Agencies are eligible to apply for CDBG and HOME funding during the annual application round conducted by Lake County Community Development.

As a funder who may provide HOME, CDBG or ESG to assisted housing providers, Lake County maintains regular communications with many of Lake County maintains regular communications with many of Lake County's service agencies that provide assisted housing. Additionally, County staff participate in meetings of government and service agency groups that deal with housing issues, such as the Metropolitan Mayor's Caucus and the Illinois Governor's Conference on Affordable Housing.

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

Community Development staffs the Continuum of Care, so substantial overlap of efforts and coordination do take place.

Lake County Community Development has an extremely collaborative relationship with the Lake County Coalition for the Homeless (the Coalition), the Continuum of Care (CoC) that serves Lake County. Lake County employs the Coalition's CoC Coordinator, Continuum of Care Specialist and HMIS Administrator, who work closely with Lake County Community Development staff and are consulted on all matters related to homelessness. Lake County Community Development also serves and the Coalition's Collaborative Applicant, which is the body that submits funding applications on behalf of the CoC. This relationship supports the work of local agencies and ensures that the planning and funding efforts of the Coalition and the County are strategic and collaborative.

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

Lake County works closely with its Continuum of Care (CoC), housed within Community Development and supported by dedicated staff including a CoC Program Coordinator, CoC Program Specialist, and HMIS Administrator. ESG funding decisions are guided by a data-driven process that includes monthly analysis of HMIS data, as well as annual review of System Performance Measures (SPMs) and Longitudinal Systems Analysis (LSA). These data sets are used to assess system performance, identify service gaps, and inform the strategic allocation of ESG resources based on the needs and characteristics of the local homeless population. The CoC collaborates with the Lake County Coalition for the Homeless and the HMIS Committee to oversee HMIS policies and procedures, ensuring data quality, compliance, and coordinated system-wide standards.

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



1	<b>Agency/Group/Organization</b>	City of Zion
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Development staff met with City of Zion staff to discuss the economic development and non-housing community development needs of the City. It is anticipated that the City will continue to engage Lake County Community Development to assist in the implementation of the strategies outlined in the City's Comprehensive Plan.
2	<b>Agency/Group/Organization</b>	Waukegan Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Development staff contacted the Waukegan Housing Authority staff to discuss the potential to collaborate on projects where the goals of the WHA and the goals of the 5-Year Consolidated Plan overlap. The anticipated outcome of this consultation is an increase in rental assistance resources available to low-income Lake County residents with disabilities, improved access to services, and improved coordination between the Waukegan Housing Authority and Lake County Community Development.
3	<b>Agency/Group/Organization</b>	North Chicago Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Development staff corresponded with North Chicago Housing Authority staff to discuss the potential to collaborate on projects where the goals of the NCHA and the goals of the 5-Year Consolidated Plan overlap. The anticipated outcome of this consultation is improved coordination between the North Chicago Housing Authority and Lake County Community Development, which will improve the outcomes of existing programs.
4	<b>Agency/Group/Organization</b>	Lake County Workforce Development

	<b>Agency/Group/Organization Type</b>	Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A consultation was held between the Workforce Development, key staff of the organization and Lake County Community Development. Ideas for future collaborations were discussed that will be considered in the future including creating subsidies for individuals seeking employment resources and continued transit assistance to those households until they are self-sufficient in this regard.
5	<b>Agency/Group/Organization</b>	Lake County Health Department
	<b>Agency/Group/Organization Type</b>	Services - Housing
		Services-Children
		Services-Elderly Persons
		Services-Persons with Disabilities
		Services-Persons with HIV/AIDS
		Services-Victims of Domestic Violence
		Services-homeless
		Services-Health
		Health Agency
		Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Lake County Health Department (LCHD) was consulted on the existing programs for lead poisoning in Lake County. The LCHD provided data on the number of cases investigated and the trends they interpret from the data. Potential outcomes included an improved coordinated effort to target the areas where cases are most common.
6	<b>Agency/Group/Organization</b>	The Alliance for Human Services in Lake County
	<b>Agency/Group/Organization Type</b>	Services - Housing
		Services-Children
		Services-Elderly Persons

		Services-Persons with Disabilities
		Regional organization
		Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Non-Homeless Special Needs
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	At a convening of non-profit Executive Directors by the Lake County Alliance for Human Services, Lake County Community Development attended an informal focus group on the service needs in the County. There was substantial interest in coordination of services by United Way 211 and the ServicePoint Referral Network. Lack of transportation was mentioned as a barrier to both services and jobs.
7	<b>Agency/Group/Organization</b>	Lake County Municipal League
	<b>Agency/Group/Organization Type</b>	Housing
		Other government - County
		Other government - Local
		Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lake County Community Development consulted with the Lake County Municipal League (LCML). The topics discussed included the potential role for the Lake County Land Bank Authority (LCLBA). It was noted that affordable housing is a natural byproduct of Land Banking activities and that the LCLBA can serve as a redevelopment tool for many of Lake County's vacant and/or distressed properties.
8	<b>Agency/Group/Organization</b>	Antioch Township
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans

		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
		Market Analysis
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A meeting was held at the Antioch Public Library District to discuss local homelessness data and community coordination. Attendees included township caseworkers, community-based service providers, and library staff.
9	<b>Agency/Group/Organization</b>	Freemont Township
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
		Non-Homeless Special Needs
		Market Analysis
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A meeting was held at the Antioch Public Library District to discuss local homelessness data and community coordination. Attendees included township caseworkers, community-based service providers, and library staff.
10	<b>Agency/Group/Organization</b>	Avon Township
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children

		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
		Market Analysis
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A meeting was held at the Antioch Public Library District to discuss local homelessness data and community coordination. Attendees included township caseworkers, community-based service providers, and library staff.
11	<b>Agency/Group/Organization</b>	Lake County Coalition for the Homeless
	<b>Agency/Group/Organization Type</b>	Services - Housing
		Services-Children
		Services-Elderly Persons
		Services-Persons with Disabilities
		Services-Persons with HIV/AIDS
		Services-Victims of Domestic Violence
		Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lake County's Continuum of Care is housed within Community Development and staffs the Lake County Coalition for the Homeless, enabling close coordination between CoC efforts and broader community initiatives. With shared staffing, the structure supports consistent consultation and strategic planning. The CoC Coordinator reports to the Community Development Administrator and uses HMIS and system performance data to guide funding decisions, identify service gaps, and inform targeted responses to homelessness in Lake County.

12	<b>Agency/Group/Organization</b>	Lake County Division of Transportation
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy
		Non-Homeless Special Needs
		Market Analysis
		Economic Development
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives of the Lake County Division of Transportation met with Community Development to discuss the County's needs as they relate to transportation and future planning. Plans were discussed to have consulting group work hand-in-hand with County decision makers to use CDBG-PS funding to improve transit in Lake County for low/mod income households. Work in this regard would be done in concert with a recent transit study completed for the County.
13	<b>Agency/Group/Organization</b>	City of North Chicago
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Multiple one-on-one meetings were held to discuss the City's priority needs and how they could be addressed. The city expressed the needs for funding capital projects including bolstering their aging infrastructure.
14	<b>Agency/Group/Organization</b>	Community Youth Network
	<b>Agency/Group/Organization Type</b>	Services - Housing
		Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs - Unaccompanied youth

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Development staff met with Community Youth Network to discuss their priorities and plans for growth. The CYN staff indicated that the organization is interested in expanding and partnering with other youth organizations to better serve youth who need counseling, after school enrichment, and housing. The consultation is expected to improve coordination for services for Lake County youth.
15	<b>Agency/Group/Organization</b>	Mano a Mano Family Resource Center
	<b>Agency/Group/Organization Type</b>	Services-Health
		Services-Education
		Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
		Economic Development
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Mano a Mano representatives provided their input on what they felt Community Development should prioritize in the future in a face-to-face meeting. The growing foreign born and Spanish speaking population in Lake County could benefit from County spending to improve job readiness according to Mano a Mano representatives. Computer skills training, quality childcare and supports for citizenship assistance were also identified as important focusses for funding consideration by the Mano a Mano staff.
16	<b>Agency/Group/Organization</b>	Highland Park Community Nursery School & Day Care Center
	<b>Agency/Group/Organization Type</b>	Services-Children
		Services-Education
		Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
		Economic Development
		Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Highland Park ED met face-to-face with Community Development representatives to express her organization's concerns for the future and what priorities CD should consider for future planning. The organization has seen an increasing need for subsidized childcare for low/mod income households. As there is increasing need the pre-school suggests that increasing resources to offset the costs not covered elsewhere would ease the burden on these low/mod income households and allow them to support their family via employment.
17	<b>Agency/Group/Organization</b>	Center for Enriched Living
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
		Services-Persons with Disabilities
		Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from the Center for Enriched Living met face-to-face with Lake County representatives to express their opinion on what the greatest challenges their clients are facing in the community. Investments in employment services for intellectually disabled Lake County residents was identified as a key potential focus for the County. Additionally, needs for mental health services is always present.
18	<b>Agency/Group/Organization</b>	Great Lakes Adaptive Sports Association
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from GLASA met with Lake County representatives to discuss, face-to-face, the priorities they believe the County should include in their upcoming consolidated plan. GLASA representatives expressed needs for additional mental health services and transportation. GLASA staff proposed further investment in disability services such as those provided by GLASA. If service dollars were not possible, then capital investments in equipment would be helpful to the organization.
19	<b>Agency/Group/Organization</b>	Erie Family Health Center Inc.
	<b>Agency/Group/Organization Type</b>	Services-Health



	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
		Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from Erie's Waukegan facility met face-to-face with Lake County representatives to discuss their organization's future and the needs they see in the community. Their client numbers are growing, and they suggested that continued investment in their behavioral health services will support the growth they're seeing. They have become an efficient provider of counseling and psychiatric services for low/mod income households which is not the case County-wide. Investment in their programs could result in better health outcomes for Lake County's low/mod income residents.
20	<b>Agency/Group/Organization</b>	Prairie State Legal Services
	<b>Agency/Group/Organization Type</b>	Services - Housing
		Services-Victims of Domestic Violence
		Service-Fair Housing
		Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
		Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from Prairie State Legal Services (PSLS) expressed the need for affordable housing, accessible housing, lack of healthy nutritious foods, employment and school disparities, especially with special education, as needs in the community. LCCD is facilitating an opportunity for PSLS to meet with potential clients in the courthouse when they are in court facing eviction, helping low-income families gain representation in real time.
21	<b>Agency/Group/Organization</b>	Lake County Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
		Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Development staff met with Lake County Housing Authority staff to discuss the potential to collaborate on projects where the goals of the LCHA and the goals of the 5-Year Consolidated Plan overlap. The anticipated outcome of this consultation is an increase in rental assistance resources available to low-income Lake County residents with disabilities, improved access to services, and improved coordination between the Lake County Housing Authority, the Lake County Coalition for the Homeless, and Lake County Community Development.
22	<b>Agency/Group/Organization</b>	Lake County Funders - Lake County Community Foundation
	<b>Agency/Group/Organization Type</b>	Services & Philanthropy
		Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lake County Community Development team members participate in monthly funders call with numerous Lake County members and organizations. During these calls Lake County hears from organizations that share a common interest of improving the quality of life in the Lake County area.
23	<b>Agency/Group/Organization</b>	Lake County Partners
	<b>Agency/Group/Organization Type</b>	Business and Civic Leaders
		Economic Development
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Lake County staff discussed issues impacting economic development with Lake County Partners (LCP). LCP identified the continued need for investment in housing as housing burden increased across all income levels.
24	<b>Agency/Group/Organization</b>	Live Well Lake County - Lake County Health Department
	<b>Agency/Group/Organization Type</b>	Services - Housing
		Services-Elderly Persons
		Services-Health
		Services-Education
		Services-Employment
		Health Agency
		Publicly Funded Institution/System of Care
		Foundation
		Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Poverty impact on Health Outcomes

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This group led by the Lake County Health Department identified health trend disparities in Lake County, where low-income and less educated populations were more likely to suffer from Hypertension, Obesity and Diabetes. Another key observation was a need to strengthen the capacity and infrastructure of behavioral health services.
25	<b>Agency/Group/Organization</b>	Lake County Haven
	<b>Agency/Group/Organization Type</b>	Services – Housing
		Services – Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs
		Non-Homeless Special Needs
		Non-Housing Community Development
		Special Needs Facilities and Services
		Barriers to Affordable Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representative for Lake County Haven expressed challenges for access to mental health services and the time needed to focus on mental health. Linking people to services that are accessible and affordable, specifically psychiatric services is key.
26	<b>Agency/Group/Organization</b>	A Safe Place
	<b>Agency/Group/Organization Type</b>	Services - Housing
		Services-Victims of Domestic Violence
		Services – Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs
		Non-Homeless Special Needs
		Non-Housing Community Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from A Safe Place and representatives from the County meet face-to-face to discuss the needs they are seeing in the community. A Safe Place identified a need for more trauma informed shelters. There is a rise in numbers of people seeking shelter, this is both due to more awareness and additional needs. Navigating McKinney Vento proves challenging for families in the shelter.

27	<b>Agency/Group/Organization</b>	Youth Conservation Corps (YCC)
	<b>Agency/Group/Organization Type</b>	Services – Employment
		Services – Youth
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
		Non-Housing Community Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from Youth Conservation Corps (YCC) and representatives from the County meet face-to-face to discuss the needs they are seeing in the community. YCC identified an increase in homelessness among youth, both from parents turning kids out when they turn 18 and youth choosing to leave their parents home at or before turning 18. Transportation is an ongoing need, these are opportunities to connect with the local public transportation company, PACE, to look at bus routes and avoid some of the areas where gangs are prevalent.
28	<b>Agency/Group/Organization</b>	PADS Lake County
	<b>Agency/Group/Organization Type</b>	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Needs
		Homeless Facilities
		Barriers to Affordable Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from PADS Lake County and representatives from the County meet face-to-face to discuss the needs they are seeing in the community. PADS identified a lack of affordable housing. Going forward they feel that PSH will become more necessary. They are anticipating seeing in increase in the homeless population, specifically new people and families. This is likely due to a rise in eviction and the increase cost of living.
29	<b>Agency/Group/Organization</b>	Zacharias Sexual Abuse Center (ZCenter)
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence
		Services – Victims
		Non-Homeless Special Needs

	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Representatives from ZCenter and representatives from the County meet face-to-face to discuss the needs they are seeing in the community. ZCenter sees a need for family shelters.

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

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Lake County Strategic Plan	Lake County	The Lake County Strategic Plan has the stated objective to “Promote and implement policies and practices that reduce barriers to housing affordability and supply.”
Lake County CEDS	Lake County Partners	The Lake County CEDS has the stated strategy to “Increase the number of housing units (owner occupied and rental) across the spectrum of affordability and density.”
Lake County CHIP	Lake County Health Dept.	The Lake County CHIP s, the coalition identified the following three priority areas for action: Access to Care, Education, and Housing.

**Table 3 – Other local / regional / federal planning efforts****Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

Lake County actively looks to partner with the State of Illinois to coordinate efforts to implement the goals of the ConPlan. Specifically, opportunities for coordination with the State of Illinois come through participation in the planning effort to create their HUD Consolidated Plan and the Illinois Office to Prevent and End Homelessness (OPEH) Home Illinois Plan.

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

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

Public notices for all public hearings related to the Consolidated Plan were published local newspapers. In addition, advisory emails were sent to non-profit and municipal organizations advertising public meetings, soliciting input and inviting in-person consultations related to the Consolidated Plan.

The citizen participation process was critical to identify existing strengths and needs, increasing community knowledge and awareness, reinforce and establish partnerships, align available resources and allow for community buy-in and support for the plan.

#### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	newspaper	non-targeted/ broad community	notice of public hearing on June 12, 2024, published May 29, 2024	none	none	
2	newspaper	non-targeted/ broad community	notice of public hearing on July 10, 2024, published July 3, 2024	comments made at July 10, 2024, public meeting		



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2-1	Public meeting	non-targeted/ broad community	public meeting Housing and Community Development Commission (HCDC) July 10, 2024	Joanna Jaimes of Mano a Mano commented on the critical need to provide comprehensive, linguistic, and culturally competent services to meet the needs of our ever-growing population. Their Productive Parent Program provides services that are essential for helping our community members acquire the skills they need to thrive in the workforce.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2-2	Public meeting	non-targeted/ broad community	public meeting HCDC July 10, 2024	Rob Anthony of Community Partners for Affordable Housing (CPAH) reported that about thirty percent of homeowners and almost fifty percent of renters were housing cost burdened. Lake County Partners reported that 75% of renters with incomes under 50,000 dollars are living in housing that is unaffordable, it also concluded that there were 1,200 more housing units needed for Seniors, and 6,700 more units needed for families by 2027. The Illinois Housing Development Authority identifies communities across the state that has less than ten percent of their housing stock as affordable, and those are called non-exempt communities under the Illinois Affordable Housing Planning and Appeals Act.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2-3	Public meeting	non-targeted/ broad community	public meeting HCDC July 10, 2024	Jennifer Yonan of Youth Conservation Corps (YCC) stated that YCC has been serving youth in our community for 50 years to provide an education and training program serving youth ages 16 – 24 years old who are disconnected from school and from employment. They help the young adults in our program earn their high school diploma or GED, teach life skills, leadership development and workforce readiness skills.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>
2-4	Public meeting	non-targeted/ broad community	public meeting HCDC July 10, 2024	Greg Davenport of North Suburban Legal Aid Clinic provides free legal service in the practice areas of immigration, housing, domestic violence. Their program provides support for low-income tenants' eviction matters, tenant and landlord disputes, helping with subsidize housing and vouchers.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2-5	Public meeting	non-targeted/ broad community	public meeting HCDC July 10, 2024	Allen Swilley of PADS Lake County stated homelessness is increasing at an alarming rate, year over year. PADS Lake County is considered the 'front door to the homeless services system' and will be on the front lines providing services to residents experiencing housing crises. Lake County must continue to develop resilient assets that can respond to the entrenched nature of homelessness. The leveraging of new durable social assets, like fixed shelters, coupled with an ecosystem of resources and programs, will change the landscape of homelessness in our community and ensure the county has a robust and healthy homeless response system.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2-6	Public meeting	non-targeted/ broad community	public meeting HCDC July 10, 2024	Pat Davenport of A Safe Place commented when considering the housing crisis, they must come up with a progressive and aggressive plan for victims of domestic violence and human trafficking. Under the First Housing Policy, which prioritizes placing survivors in a home immediately however the reality in our County and the way the economy, housing shortage, and financial barriers they face makes it almost impossible to house someone in a safe environment right away.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2-7	Public meeting	non-targeted/ broad community	public meeting HCDC July 10, 2024	<p>Megan Brady of Prairie State Legal Services (PSLS) offers no-cost civil legal services to the elderly, disabled, low income, and otherwise vulnerable residents of Lake County. We work with tenants and homeowners on a variety of housing issues including evictions, subsidized housing concerns, foreclosure, housing discrimination, housing conditions issues, and accommodations to help individuals with disabilities remain housed. PSLS identifies the following needs in our community:</p> <ul style="list-style-type: none"> <li>• Lack of affordable housing;</li> <li>• Habitability issues;</li> <li>• Need for homelessness prevention programs;</li> <li>• Lack of accessible housing for people with disabilities;</li> <li>• Barriers to renting because of discriminatory practices;</li> <li>• Financial assistance for security deposits, application fees, and moving expenses; and</li> <li>• Temporary housing for renters experiencing a gap in housing.</li> </ul>	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83336/2024-07-10-HCDC-Meeting-Minutes</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public meeting	non-targeted/ broad community	public meeting HCDC August 14, 2024	Joel Williams of Habitat for Humanity Lake County, a developer of affordable homeownership solutions, commented that they are building 8 single family homes that will be owner-occupied by households making less than 80% of the Area Median Income and hope to continue to grow the number of homes they build each year. Communities of need are often far below the average homeownership rate, and opportunities for individuals and families to become homeowners are becoming increasingly more difficult. When you consider the lack of opportunities for households of color, the need becomes even more apparent. Historic systemic inequities, including racist lending practices, redlining, and countless other issues, mean that the opportunity to become a homeowner is seemingly impossible for far too many people.	None	<a href="https://www.lakecountyl.gov/DocumentCenter/View/83337/2024-08-14-HCDC-Meeting-Minutes">https://www.lakecountyl.gov/DocumentCenter/View/83337/2024-08-14-HCDC-Meeting-Minutes</a>

**Table 4 – Citizen Participation Outreach**

## Needs Assessment

### NA-05 Overview

#### Needs Assessment Overview

The October 2023 Lake County Housing Analysis highlighted critical housing needs, including a lack of housing options, insufficient affordable supply, an increase in senior households with higher incomes, and a sharp rise in homelessness—newly homeless households increased by 85%, and general homelessness rose by 300%. Lake County needs housing stock to accommodate various income levels, ages, household sizes, and life stages. By 2027, approximately 17,700 rental and owner units will be needed for senior households. A decline in residential development signals a growing housing deficit.

According to Housing Action Illinois' 2023 "Out of Reach" report, full-time workers must earn \$28.81 per hour to afford a modest two-bedroom apartment at fair market rent, well above Illinois' minimum wage of \$15.00 as of January 2025. Lake County's 2023 poverty rate is 8.2%, with 58,118 residents below the poverty level, many spending over 50% of their income on housing. As of January 2025, the average rent in the county was \$2,075, surpassing the national average of \$1,968. The analysis shows that 44,000 homeowners and 29,000 renters in the county live in unaffordable housing. In FY24, 1,000 of the 1,300 people experiencing homelessness were newly homeless.

These findings emphasize the urgent need for more housing in Lake County, especially affordable units for low- and moderate-income residents to reduce housing cost burdens and instability.

The Needs Assessment and Market Analysis highlights the severe housing cost burden in Lake County for whom even "affordable" housing remains out of reach. The high costs faced by both homeowners and renters emphasize the urgent need for additional housing units to address this growing challenge.



## NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

HUD classifies households as "cost-burdened" as over 30% of a household's income toward housing costs. Cost burden can strain finances and limit the ability to afford other essential needs. This is especially challenging for low-to-moderate income households. Households that spend more than 50% of their income on housing are considered "severely cost-burdened." Housing assistance programs help reduce housing costs for low-to-moderate income families, lowering the risk of becoming cost-burdened. Cost burdens are a direct result of lower income levels.

The most recently available CHAS (Comprehensive Housing Affordability Strategy) data based on the Census' American Community Survey 2017-2021 estimate show housing cost burden households in Lake County slightly increased across most categories of owners and renters. Approximately 13% of owner-occupied households and 21% of renter-occupied households were considered cost-burdened, spending more than 30% of their income on housing costs. Roughly 9% of owner-occupied households and 21% of renter-occupied households were severely cost burdened, spending more than 50% of income on housing costs. Renters faced significantly higher burden compared to homeowners.

Of the housing problems identified in the Housing Needs Summary Table below, the greatest number of both renters (25,079) and owners (31,909) indicated that they were severely cost burdened, spending more than 30-50% of their income on housing costs. Housing cost burden greater than 30% of income was the most reported housing problem for renters (13,051) and housing cost burden greater than 50% was the most reported housing problem for owners (16,022).

These trends suggest a growing need for affordable housing solutions in Lake County, particularly for renters who continue to experience higher cost burdens.

Demographics	Base Year: 2013	Most Recent Year: 2023	% Change
Population	703,019	708,760	0.8%
Households	244,935	260,243	6.3%
Median Income	\$74,869	\$108,364	44.7%

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2013 & 2023 ACS 1-Year Estimates, Tables DP05 and SP1901

## Number of Households Table

	0-30% HAMFI	>30- 50% HAMFI	>50- 80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	26,535	24,185	36,135	22,960	142,915
Small Family Households	7775	8040	13405	10340	39560
Large Family Households	1620	2655	3910	2250	10435
Households contain at least one person 62-74 years of age	6110	5710	8390	5465	25675
Household contains at least one-person age 75 or older	5020	4550	5425	2515	17510
Households with one or more children 6 years old or younger	3850	4115	5760	3760	17485

**Table 6 - Total Households Table**

Data 2017-2021 CHAS  
Source:

## Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	350	165	220	80	815	75	15	85	55	230
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	125	130	250	265	770	55	110	55	40	260
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	480	630	385	220	1715	145	380	525	255	1305
Housing cost burden greater than 50% of income (and none of the above problems)	8595	2985	895	140	12615	7315	4335	3280	890	15820

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Housing cost burden greater than 30% but below 50% of income (and none of the above problems)	1875	4880	4230	1130	12115	1715	4375	6425	2980	15495
Zero/negative Income (and none of the above problems)	1825	0	0	0	1825	970	0	0	0	970

**Table 7 – Housing Problems Table**

Data 2017-2021 CHAS

Source:

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

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	11420	8785	5975	1835	28015	9300	9210	10365	4220	33095
Having none of four housing problems	2125	1985	6925	5790	16825	900	4205	12870	11110	29085
Household has negative income, but none of the other housing problems	1825	0	0	0	1825	970	0	0	0	970

**Table 8 – Housing Problems 2**

Data 2017-2021 CHAS

Source:

### 3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	4,100	3,595	1,970	9,665	2,270	2,365	3,675	8,310
Large Related	800	690	224	1,714	650	1,000	655	2,305
Elderly	3,435	1,800	915	6,150	4,865	4,330	3,885	13,080
Other	2,985	2,395	2,175	7,555	1,415	1,230	1,595	4,240
Total need by income	11,320	8,480	5,284	25,084	9,200	8,925	9,810	27,935

**Table 9 – Cost Burden > 30%**

Data 2017-2021 CHAS  
Source:

### 4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	3470	1045	135	4650	1895	1545	1425	4,865
Large Related	640	305	4	949	525	440	150	1,115
Elderly	2755	820	440	4015	3850	1990	1435	7,275
Other	2465	1040	375	3880	1165	510	325	2,000
Total need by income	9330	3210	954	13494	7435	4485	3335	15255

**Table 10 – Cost Burden > 50%**

Data 2017-2021 CHAS  
Source:

### 5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	550	670	595	425	2240	195	440	370	190	1195
Multiple, unrelated family households	35	90	50	25	200	15	50	205	105	375

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	20	0	0	45	65	0	0	15	0	15
Total need by income	605	760	645	495	2505	210	490	590	295	1585

**Table 11 – Crowding Information - 1/2**

Data 2017-2021 CHAS  
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	2945	2375	2330	7650	905	1740	3430	6075

**Table 12 – Crowding Information – 2/2**

Data 2017-2021 CHAS  
Source:

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

The 2019-2023 American Community Survey Estimates cites that 60,020 of Lake County's population are single-person households representing 18.7% of owner-occupied housing units and 37% of renter-occupied housing units. In the 2023 One-Year Estimate for Lake County, 25% of owner-occupants with a mortgage and 15% of owner occupants without a mortgage are cost burdened. Among these, the population most at risk of housing instability includes single low income individuals, seniors, homeless and formerly homeless individuals, those living below the poverty line, survivors of domestic violence, individuals with disabilities, people with mental health conditions, those facing foreclosure, veterans, young adults (aged out of foster care system) individuals who have recently lost their jobs and returning citizens. Furthermore, single person households are more than twice as likely to be renters. Because single person households are more than twice as likely to be renters, it is important to note that ACS estimates show 47.6% of renters in Lake County are cost-burdened paying more than 30% of their income on housing costs.

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

According to the 2023 1-Year American Community Survey Estimate, approximately 21.7% of Lake County households have a disability. Renters in Lake County are more likely to be cost burdened, with around 29,363 households spending more than 30% of their income on housing costs. The Census Bureau's poverty thresholds, used to estimate the number of households in

need, are not the same as the guidelines used for program eligibility. For example, Lake County uses HOME Income Limits, which classify household earning at or below 30% of the Area Median Income (AMI) as Extremely Low Income (ELI), and those earning at or below indicate that approximately 55,799 Lake County residents have a disability.

The Census Bureau uses nationwide "poverty thresholds" (often referred to as the "poverty line") to calculate poverty at a population level. These thresholds are not used to determine financial eligibility for programs like the "poverty guidelines" used by other U.S. federal agencies. Additionally, the poverty thresholds are based on pre-tax money income and do not account for noncash benefits, such as public housing assistance or Medicaid.

The U.S. Census Bureau does not provide data on the number of families who are survivors of domestic violence (DV) and are cost-burdened, requiring housing assistance. To estimate how many families in need of housing assistance may fall into this category, Lake County has used a combination of census data on poverty levels and HMIS data on DV survivors.

Lake County uses the HOME Income Limits to determine eligibility for housing funded by the HOME Investment Partnership Program. These limits are based on the median income of households in the area. Households with incomes at or below 30% of the Area Median Income (AMI) are classified as "Extremely Low Income (ELI)," those with incomes at or below 50% AMI are classified as "Very Low Income (VLI)," and those with incomes at or below 80% AMI are classified as "Low Income." All housing funded by the HOME program must be reserved for low-income households, specifically those below 80% AMI.

Public Housing Agencies in Lake County use Section 8 Income Limits, which define "Extremely Low Income" as families whose income is at or below the higher of the Federal poverty level or 30% of the AMI. This means that, while the poverty level is one way to identify households that might need housing assistance, many more households are eligible for assistance under the HOME program or Section 8 programs than just those at or below the poverty level. The U.S. Census Bureau Poverty Threshold (weighted) for 2024 is \$16,320 for a family of one, \$21,006 for a family of two, \$24,537 for a family of three, and \$32,355 for a family of four.

The data indicates that those living with a disability are far more likely than those living without a disability to have an income less than 100% of the poverty level. This equals an approximate 17,400 residents living with a disability with an income below 100% of the poverty level and approximately 66,658 residents living without a disability with an income below 100% of the poverty level. Similarly, those living with a disability are more likely to be unemployed than the general population. This indicates that those living with a disability are more likely to be in need of housing assistance.

According to HUD, individuals or families who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or other dangerous or life-threatening conditions and who lack resources and support networks to obtain other permanent housing” are considered “Category 4” homeless. For safety purposes, domestic violence shelters do not track their clients in the Homeless Management Information System, so it is difficult to estimate the exact number of domestic violence survivors who utilize housing programs such as emergency shelter, permanent supportive housing, and rapid rehousing. Due to the limited number of shelter beds, a portion of DV survivors are diverted from emergency shelter. Approximately 119 out of the 2,242 people that reported through the HMIS system for program year reported a history of domestic violence, sexual assault, dating violence, stalking or human trafficking.

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

The Comprehensive Housing Affordability Strategy (CHAS), which is a U.S. Department of Housing and Urban Development (HUD) custom tabulation of the U.S. Census Bureau’s American Community Survey (ACS) data, identifies four housing problems and four severe housing problems. The four housing problems include: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems include: incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.

The Housing Needs Summary Tables 7. Housing Problems of the NA-10 breaks these into categories of housing problem: substandard housing (lacking complete plumbing or kitchen facilities), severely overcrowded (>1.51 people per room), overcrowded (1.01-1.5 people per room), housing cost burden greater than 50% of income, housing cost burden greater than 30% of income, and zero/negative income. For the purposes of this discussion, any household with a housing cost burden greater than 50% of income will be referred to as severely cost-burdened.

Of the six housing problems identified in the table, the problem impacting the highest amount of renters (12,615) and owners (15,820) across all income levels was the problem of severe housing cost burden (housing costs greater than 50% of their income and none of the above problems). Housing cost burden (housing costs greater than 30% of income and none of the above problems) was the second most reported housing problem, affecting 12,115 of renters and 15,495 of owners.



It is important to understand that the Housing Problems table reflects only the number of owner and renter households experiencing one specific housing issue, such as cost burden, without any additional problems. This approach significantly understates the actual number of cost-burdened households.

According to the 2017–2021 CHAS Summary Level Data for Lake County:

- The total number of owner households with a cost burden is 31,315, and those with a severe cost burden is 15,820
- For renter households, the total with a cost burden is 24,730, and with a severe cost burden is 12,615.

This suggests that a large number of cost-burdened households are also experiencing additional housing problems, such as overcrowding or substandard living conditions, which exclude them from being counted in single-problem categories.

The prevalence of this issue is echoed in the 2019-2023 ACS 5-Year Estimates data, which indicates that 25% of owner-occupants with a mortgage were cost-burdened. However, 17% of owner-occupants without a mortgage were cost-burdened and suggests current financial products contribute to cost burden to a significant degree. Close to half (47.5%) of renter-occupied households pay more than 30% of their household income in rent.

While housing cost burden or severe housing cost burden are more common than other housing problems, this does not mean that this is the only issue present. The *Housing Problems* table shows that 815 renters and 230 owners reported substandard housing, 770 renters and 260 owners reported severe overcrowding, 1,715 renters and 1,305 owners reported overcrowding, and 1,825 renters and 970 owners reported a zero or negative income. Again, these numbers include only households that had the indicated issue and no other housing problems.

Lake County's 211 System receives approximately 8,900 calls and text messages annually. Of these, about 45% are related to housing and shelter, highlighting the significant demand for support in this area. Among housing-related inquiries, approximately 17.6% seek help finding shelter, 17.5% request assistance locating low-cost housing, 39.7% seek rental assistance, and 3.1% need mortgage assistance. These figures underscore the ongoing need for comprehensive housing support services in Lake County—from immediate shelter to long-term affordable housing and homeowner assistance.

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

According to the *Cost Burden > 30%* table and *Cost Burden > 50%* tables in this section, whether households rent or own may have an influence on the type of families more likely to be cost burdened or severely cost-burdened.

In terms of cost-burden, of renters, there are generally more families with lower incomes that are cost-burdened than families with higher incomes, regardless of whether that family is a small related, elderly, or other. Large-related households with more cost-burdened households in the 0 - 30% AMI range than in the 30 -50% AMI range. For owners large-related families have the highest number of cost burdened households is in the 30-50% AMI range while small-related households have the highest number of cost burdened households in the 50-80% AMI range. Elderly families have the highest number in the 0-30% range, and other households have the highest number in the 50-80% income level, though unlike with small and large related families, they do not decrease in number as income decreases. This pattern holds true for most family types that are owners as well; as with renters, there are more large-related, elderly, and other owner families who are severely cost burdened at lower incomes than at higher incomes. In terms of small-related families, however, there are more small-related owner families with incomes at 0-30% AMI that are severely cost-burdened than families with incomes at 30-50% AMI or 50-80% AMI.

It is important to note that the tables include total *numbers* of families and not *percentages*; while there may be more of one type of family (e.g. small related) or income level of family (e.g. 50-80% AMI) that is severely cost-burdened, this does not necessarily mean that that type or income level of family is overall more likely to severely cost burdened than another.

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

Low-income families with children – particularly those with extremely low incomes – face significant housing instability. From 2023 to 2024 Lake County experienced a 50% increase in homelessness with families representing a substantial portion of the increase. Those who are served in Homelessness Prevention and Diversion programs are considered to be at imminent risk of residing in shelters or becoming unsheltered. In Federal FY 2023 (10/1/2023- 9/30/2024), 2,242 people were served in Homelessness Prevention and Diversion Programs, including 465 households with children and 421 households without children. The households included 67% adult females and 32% adult males.

Approximately 19% of households included persons with disabilities and 17% had a history of domestic violence. 68% of households served identified as African American and 17% identified as Hispanic/Latino.

Rapid rehousing is targeted so that the intervention will be most effective. 70% of RRH households successfully exit to permanent housing. For those clients who are nearing the termination of assistance and not likely to successfully exit, their needs are met with ongoing case management for up to 16 months.

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

For this section, Lake County defines the "at-risk" group as all families and individuals who received services through Homelessness Prevention or Diversion Programs during Federal Fiscal Year 2024. This population was identified using data from the Homeless Management Information System (HMIS), which tracks clients served by homelessness programs in the county. All Continuum of Care agencies in Lake County, except for Domestic Violence agencies, contribute data to HMIS. Client-level entries ensure each individual is counted only once.

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

There are no specific housing characteristics directly linked to instability or increased risk of homelessness in Lake County. However, certain groups are disproportionately represented among residents who are homeless or at imminent risk of homelessness.

For more information on the population of homeless Lake County residents, please see the "NA-40 Homeless Needs Assessment" section below.

For the purposes of this section, Lake County considers all families served by Homelessness Prevention and Diversion programs as "at-risk" of homelessness. Data reveals that certain groups are disproportionately affected, including women, individuals with disabilities, and African Americans. Census data further shows that these subgroups are more likely to experience poverty in Lake County, making them particularly vulnerable to housing instability and homelessness. Addressing these disparities is critical for effectively preventing homelessness in the community. Of the people served by Lake County's Prevention and Diversion Program in FY2024 891 adult males and 1325 adult females, a male to female ratio of 67.24. According to the 2020 Census, the male to female ratio of Lake County residents is 358,610 : 353,732, or a male to female ratio of 101.2:100. This indicates that females are more likely than males to be at imminent risk of homelessness. According to the 2019-2023 American Community Survey, households headed by single females are more likely to be in

poverty: 17.4% of families with a single female head of household have household income less than 100% of the poverty level, compared to 5.4% of families in general. Similarly, 13.8% of families with single female householders have incomes less than 50% of the poverty level, compared to 3.3% of families in general.

Sixteen percent of individuals served by Homelessness Prevention or Diversion programs have a disability. According to the 2017–2021 American Community Survey, people with disabilities are more likely to live in poverty than those without disabilities. Specifically, 15.4% of individuals with a disability live below the federal poverty line, compared to 9.1% of those without a disability. Additionally, 7.3% of Lake County residents with a disability live below 50% of the poverty line, versus 3.8% of those without a disability.

Black or African American make up approximately 7.6% of the county’s population (ACS, July 1, 2024 estimate), they account for 62% of individuals served by Homelessness Prevention and Diversion Programs. Additionally, data from the 2019–2023 American Community Survey show that 20% of Black or African American residents live below the federal poverty line, compared to 8.2% of the overall population.

## **Discussion**

The 2019–2023 American Community Survey data highlights a clear need for more affordable housing, as many households face cost burdens. In Lake County, 25% of homeowners with a mortgage and 17% without a mortgage are cost burdened. Renters are especially affected, with 47.6% spending more than 30% of their income on rent.

## NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205 (b)(2)

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

### Introduction

According to HUD's definition of disproportionately greater need, a racial or ethnic group experiences housing problems—such as cost burden—at a rate at least 10% higher than the general population at the same income level. The four housing problems are lack of kitchen facilities, lack of plumbing facilities, overcrowding defined as more than one person per room, and cost burden of more than 30% of the household income is expended for housing costs. Cost burden remains the most common housing problem and affects households across all income levels. Analysis of 2019–2023 American Community Survey data indicates that renters, particularly within certain racial and ethnic groups, are more likely to experience cost burden. In Lake County, 47.6% of renter households are cost-burdened, compared to 22.9% of homeowners with a mortgage and 17.0% without, suggesting a need to assess disparities by race and ethnicity to identify disproportionately impacted groups.

According to the 2017-2021 CHAS data, a significant share of households earning below 100% of Area Median Income (AMI) experience one or more of the four housing problems, with the percentage increasing among low-and moderate-income groups.

The tables below demonstrate the housing problems by level of Area Median Income, race and ethnicity.

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

Housing Problems	Has one or more of four housing problems	Has none of the 4 housing problems OR cost burden not computed, none of the other 3 housing problems	Has one or more of four housing problems (%)
Jurisdiction as a whole	20,720	5,815	78%
White	11,310	3,275	78%
Black / African American	2,820	1,250	69%
Asian	1,040	350	75%
American Indian, Alaska Native	90	4	96%
Pacific Islander	0	0	0%

Housing Problems	Has one or more of four housing problems	Has none of the 4 housing problems OR cost burden not computed, none of the other 3 housing problems	Has one or more of four housing problems (%)
Hispanic	4,920	780	86%

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

Data 2017-2021 CHAS

Source:

\*The four housing problems are:

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

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

Housing Problems	Has one or more of four housing problems	Has none of the 4 housing problems OR cost burden not computed, none of the other 3 housing problems	Has one or more of four housing problems (%)
Jurisdiction as a whole	17995	6190	74%
White	9650	3530	73%
Black / African American	2180	520	81%
Asian	775	59	93%
American Indian, Alaska Native	29	4	88%
Pacific Islander	20	0	100%
Hispanic	4905	1880	72%

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

Data 2017-2021 CHAS

Source:

\*The four housing problems are:

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

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

Housing Problems	Has one or more of four housing problems	Has none of the 4 housing problems OR cost burden not computed, none of the other 3 housing problems	Has one or more of four housing problems (%)
Jurisdiction as a whole	16340	19795	45%
White	10915	10750	50%

Housing Problems	Has one or more of four housing problems	Has none of the 4 housing problems OR cost burden not computed, none of the other 3 housing problems	Has one or more of four housing problems (%)
Black / African American	1200	1895	39%
Asian	760	745	50%
American Indian, Alaska Native	4	85	4%
Pacific Islander	0	20	0%
Hispanic	3130	6070	34%

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

Data 2017-2021 CHAS  
Source:

\*The four housing problems are:

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

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

Housing Problems	Has one or more of four housing problems	Has none of the 4 housing problems OR cost burden not computed, none of the other 3 housing problems	Has one or more of four housing problems (%)
Jurisdiction as a whole	6,055	16,900	26%
White	4,080	9,965	29%
Black / African American	200	1,180	14%
Asian	580	940	38%
American Indian, Alaska Native	70	29	71%
Pacific Islander	0	0	0%
Hispanic	1,025	4,500	19%

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

Data 2017-2021 CHAS  
Source:

\*The four housing problems are:

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

#### Discussion

Lake County residents as a whole experienced one or more housing problems at a rate of 78%, 74%, 45%, and 26% for income categories of 0-30%, 30-50%, 50-80%, and 80-100%,

respectively. According to the tables, which are populated by 2017-2021 CHAS data, some racial or ethnic groups experienced greater need.

In Lake County there are 26,535 households with an income level of 0-30% AMI (across incorporated and unincorporated areas). American Indians/Alaskan Natives within the 0-30% AMI income category experienced one or more housing problems at a rate of 96%, which is 18 percentage points higher than the entire County. Note that the sample size is small, as only 94 households who identify as American Indian or Alaskan Native were represented in this data.

Among the 24,185 households earning 30-50% AMI, Asian, American Indian, Alaskan Native, and Pacific Islander households had disproportionately greater need. One hundred percent of Pacific Islander, 93% of Asian households, and 88% of American Indian/ Alaska Native households had one or more housing problems. Note this high percentage impacts 20 Pacific Islander, 834 Asian, and 33 American Indian/ Alaska Native households.

For the 50-80% AMI category, half of White and Asian households had housing problems, roughly five percent greater need than the county as a whole. Among this income bracket countywide, 45% of all households experienced one or more housing problems.



## NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2)

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

### Introduction

According to 24 CFR 91.205, “disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group in a category of need is at least 10 percentage points higher than the percentage of persons in the category as a whole.” The categories of need include 0-30% AMI, 30-50% AMI, 50-80% AMI, and 80-100% AMI. Therefore, any racial or ethnic group within an income category which is experiencing housing problems at a rate which is more than 10 percentage points higher than the rate experienced by everyone in that income category will have disproportionately greater need.

Please note that in the following section, HUD’s use of the term “jurisdiction” covers the entire geography of Lake County, including both unincorporated and incorporated areas.

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

Severe Housing Problems*	Has one or more of four housing problems	Has none of the 4 severe housing problems OR cost burden not computed, none of the other 3 severe housing problems	Has one or more of four housing problems (%)
Jurisdiction as a whole	17130	9405	65%
White	9745	4845	67%
Black / African American	2345	1725	58%
Asian	885	500	64%
American Indian, Alaska Native	45	49	48%
Pacific Islander	0	0	0%
Hispanic	3700	2005	65%

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

Data 2017-2021 CHAS  
Source:

\*The four severe housing problems are:

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

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

Severe Housing Problems*	Has one or more of four housing problems	Has none of the 4 severe housing problems OR cost burden not computed, none of the other 3 severe housing problems	Has one or more of four housing problems (%)
Jurisdiction as a whole	8740	15445	36%
White	5005	8175	38%
Black / African American	845	1860	31%
Asian	445	390	53%
American Indian, Alaska Native	25	8	76%
Pacific Islander	20	0	100%
Hispanic	2205	4580	32%

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

Data 2017-2021 CHAS  
Source:

\*The four severe housing problems are:

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

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

Severe Housing Problems*	Has one or more of four housing problems	Has none of the 4 severe housing problems OR cost burden not computed, none of the other 3 severe housing problems	Has one or more of four housing problems (%)
Jurisdiction as a whole	5685	30445	16%
White	3915	17755	18%
Black / African American	470	2630	15%
Asian	255	1245	17%
American Indian, Alaska Native	0	89	0%
Pacific Islander	0	20	0%
Hispanic	910	8295	10%

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

Data 2017-2021 CHAS  
Source:

\*The four severe housing problems are:

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

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

Severe Housing Problems*	Has one or more of four housing problems	Has none of the 4 severe housing problems OR cost burden not computed, none of the other 3 severe housing problems	Has one or more of four housing problems (%)
Jurisdiction as a whole	1945	21005	8%
White	1070	12980	8%
Black / African American	14	1365	1%
Asian	175	1345	12%
American Indian, Alaska Native	0	100	0%
Pacific Islander	0	0	0%
Hispanic	635	4890	11%

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

Data 2017-2021 CHAS

Source:

\*The four severe housing problems are:

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

## Discussion

The jurisdiction experienced one or more severe housing problems at a rate of 65%, 36%, 16%, and 8%, for income categories of 0-30%, 30-50%, 50-80%, and 80-100%, respectively. As household income increases, the rates of severe housing problems decrease.

According to the tables, which are populated by 2017-2021 CHAS data:

Within the 0-30% AMI category, there is no racial or ethnic group that experiences a disproportionately greater need when it comes to severe housing problems. All racial and ethnic groups experience severe housing problems at a percentage lower than or within 10 percentage points higher than the jurisdiction as a whole.

Within the 30-50% AMI category, Asian, American Indian/ Alaska Native, and Pacific Islanders experienced a disproportionately greater need when it comes to severe housing problems.

Within the 50-80% AMI category, there is no racial or ethnic group that experiences a disproportionately greater need when it comes to severe housing problems. All racial and ethnic

groups experience severe housing problems at a percentage at the same or lower than the jurisdiction as a whole.

For the 80-100% AMI category, there is no racial or ethnic group that experiences a disproportionately greater need when it comes to severe housing problems. All racial and ethnic groups experience severe housing problems at a percentage lower than or within 10 percentage points higher than the jurisdiction as a whole.

As mentioned above, it is important to note that comparing racial or ethnic groups within an income category does not take into account if any racial or ethnic group is overrepresented in that income category.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205 (b)(2)

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

### Introduction

This section compares housing cost burden across racial and ethnic groups, based on the percentage of household income spent on housing. Households spending less than 30% of their income on housing are not considered cost burdened. Those spending 30-50% are classified as cost-burdened, while those spending more than 50% are considered severely cost-burdened.

Per 24 CFR 91.205(b)(2), a disproportionately greater need exists when the share of a racial or ethnic group experiencing a housing cost burden is at least 10 percentage points higher than the share for the jurisdiction as a whole. This threshold is used to identify racial and ethnic disparities in housing affordability.

Please note that in the following section, HUD's use of the term "jurisdiction" covers the entire geography of Lake County, including both unincorporated and incorporated areas.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	180,765	37,750	31,340	2,869
White	125,985	24,040	20,335	1,630
Black / African American	9,835	2,985	3,310	585
Asian	14,485	2,365	1,680	175
American Indian, Alaska Native	185	120	70	4
Pacific Islander	60	0	20	0
Hispanic	26,935	7,495	5,245	385

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

Data Source: 2017-2021 CHAS

### Discussion

The table above presents cost burden data for Lake County, Illinois, by racial and ethnic groups. It categorized households into four groups no cost burden ≤30% of income on housing, cost burdened (30-50%), severe cost burden (>50%), and no or negative income. According to the 2017-2021 CHAS

data, 252,724 households were analyzed to assess how low to moderate income households experience housing costs burdens.

#### Cost Burden (30-50%)

A total of 37,750 households or 15% of the total households analyzed are cost burdened. White households comprise 64% of the households, while Black/ African Americans make up 8%, Asians are 6%, and Hispanics at 20%

#### Severe Cost Burden (> 50%)

Similarly, a total of 31,340 households or 12% of the total households face severe cost burden expending more at or above 50% of their income on housing related costs. White households also comprise the largest group of households with severe cost burden at 65% of the total households, Black/African American at 11%, Asians at 5% and Hispanics at 17%.

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

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

Lake County as a whole experiences one or more housing problems at a rate of 78%, 74%, 45%, and 26% for income categories of 0-30%, 30-50%, 50-80%, and 80-100%, respectively. According to the tables, which are populated by 2017-2021 CHAS data, some racial or ethnic groups experience greater need. The jurisdiction experiences one or more severe housing problems at a rate of 65%, 36%, 16%, and 8%, for income categories of 0-30%, 30-50%, 50-80%, and 80-100%, respectively.

Please note that in this section, HUD's use of the term "jurisdiction" covers the entire geography of Lake County, including both unincorporated and incorporated areas.

According to HUD's definition of disproportionately greater need, the tables (populated by 2017-2021 CHAS data) indicate that:

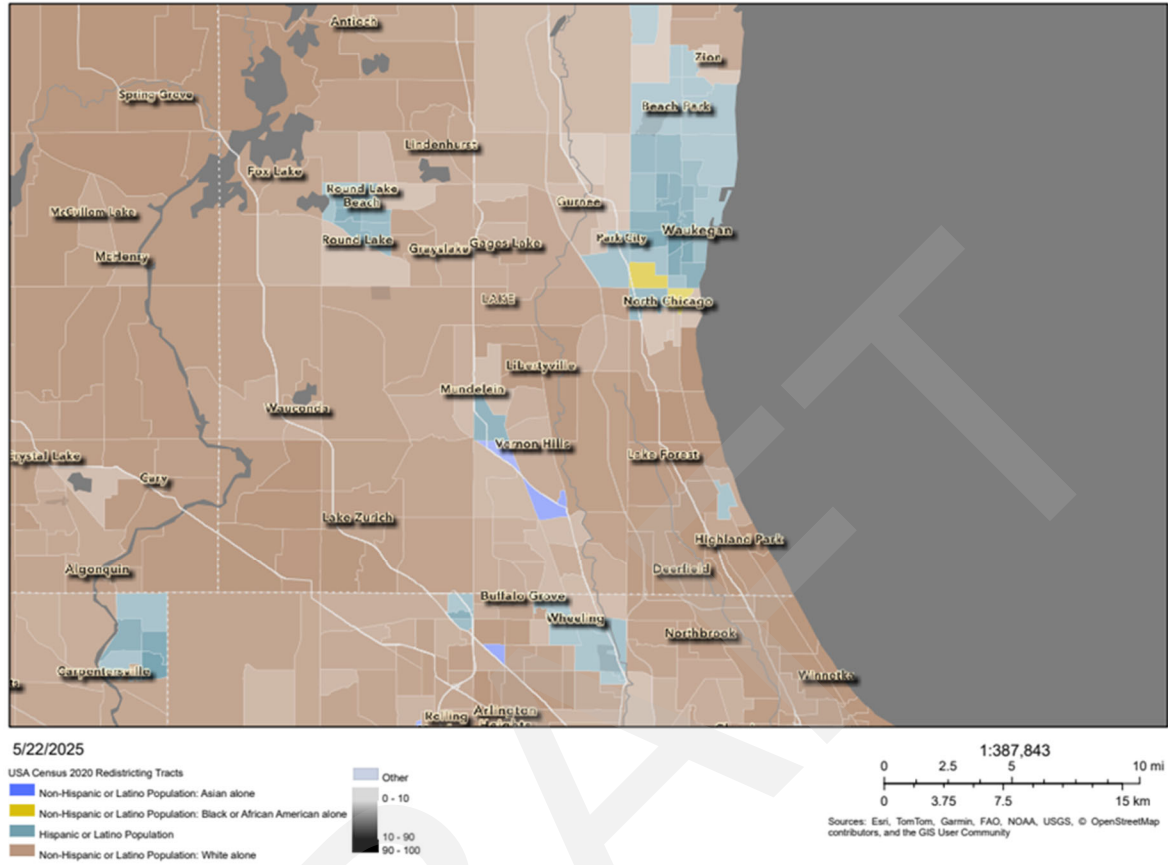
- Within the 0-30% income category, American Indians/ Alaskan Natives had disproportionately greater need in terms of housing problems, but no racial or ethnic group had disproportionately greater need in terms of severe housing problems.
- Within the 30-50% income category, Asians, American Indians/ Alaskan Natives and Pacific Islanders had disproportionately greater need in terms of housing problems and severe housing problems.
- Within the 50-80% income category, no racial or ethnic group had disproportionately greater need in terms of housing problems and severe housing problems.
- Within the 80-100% income category, Asians and American Indians/Alaskan Natives had disproportionately greater need in terms of housing problems and no racial or ethnic group had disproportionately greater needs in terms of severe housing problems.

As noted above, it is important to note that comparing racial or ethnic groups within an income category does not take into account if any racial or ethnic group is overrepresented in that income category.

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

The racial composition in Lake County varies significantly across different neighborhoods and census tracts, as highlighted by the U.S. Census Bureau's 2019-2023 American Community Survey 5-year estimates. In addition to the Northeast region of the County, the North Central and Northwest regions of the County have concentrated populations.

## Predominant Race and Ethnicity in the US (2020 Census)





## NA-35 Public Housing - 91.405, 91.205 (b)

### Introduction

Public housing agencies are important partners in the preservation and development of quality affordable housing and Lake County welcomes and encourages collaboration between public housing agencies and other organizations that help Lake County residents in need.

### Totals in Use as of December 2024

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	682	3,990	618	3,372	111	273	184

Table 22 - Public Housing by Program Type

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

**Data Source:** U.S. Department of Housing and Urban Development. Housing Choice Voucher (HCV) Data Dashboard. Published December 2024. <https://www.hud.gov/helping-americans/public-indian-housing-hcv-dashboard>. Accessed May 15, 2025.

## Average Income and Length of Stay

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Average Annual Income (HH)	0	0	\$17,430.00	\$18,122.00	\$16,503.00	N/A	N/A	N/A	N/A
Average length of stay (months)	0	0	96	112	94	N/A	56	N/A	N/A

**Table 23 – Average Income and Length of Stay of Public Housing Residents by Program Type**

**Data Source:**

U.S. Dept of Housing and Urban Development. Assisted Housing: National and Local. HUD User. Published December 2024.  
[https://www.huduser.gov/portal/datasets/assthsg.html#query\\_2009-2024](https://www.huduser.gov/portal/datasets/assthsg.html#query_2009-2024). Accessed May 15, 2025.

**VASH (Veterans Affairs Supportive Housing) Data Source:**

U.S. Dept of Veterans Affairs. Local Veterans Affairs Supportive Housing HOMES Report via Homeless Management Information System. Reported Sept 9, 2024.  
 Accessed May 22, 2025

## Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				Special Purpose Voucher
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Household Size	0	0	1.4	2.3	N/A	N/A	N/A	N/A
# Homeless at admission	0	0	N/A	N/A	N/A	N/A	70	N/A
# of Elderly Program Participants (>62)	0	0	382	1070	N/A	N/A	63	N/A
# of Disabled Families	0	0	286	823	N/A	N/A	N/A	N/A
# of Families requesting accessibility features	0	0	N/A	N/A	N/A	N/A	N/A	N/A
# of HIV/AIDS program participants	0	0	N/A	N/A	N/A	N/A	N/A	N/A
# of DV victims	0	0	N/A	N/A	N/A	N/A	N/A	N/A

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

**Data Source:**

U.S. Dept of Housing and Urban Development. Assisted Housing: National and Local. HUD User. Published December 2024. [https://www.huduser.gov/portal/datasets/assthsg.html#query\\_2009-2024](https://www.huduser.gov/portal/datasets/assthsg.html#query_2009-2024). Accessed May 15, 2025.

**VASH (Veterans Affairs Supportive Housing) Data Source:**

U.S. Dept of Veterans Affairs. Local Veterans Affairs Supportive Housing HOMES Report via Homeless Management Information System. Reported Sept 9, 2024. Accessed May 22, 2025

## Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	211	946	N/A	N/A	70	N/A	N/A
Black/African American	0	0	375	2,716	N/A	N/A	91	N/A	N/A
Asian or Pacific Islander	0	0	7	41	N/A	N/A	1	N/A	N/A
Native American/ Alaskan Native	0	0	7	0	N/A	N/A	1	N/A	N/A
Multiple	0	0	7	41	N/A	N/A	3	N/A	N/A
Other	0	0	7	0	N/A	N/A	73	N/A	N/A
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

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

**Data Source:** U.S. Dept of Housing and Urban Development. Assisted Housing: National and Local. HUD User. Published December 2024.  
[https://www.huduser.gov/portal/datasets/assthsg.html#query\\_2009-2024](https://www.huduser.gov/portal/datasets/assthsg.html#query_2009-2024). Accessed May 15, 2025.

**VASH (Veterans Affairs Supportive Housing) Data** U.S. Dept of Veterans Affairs. Local Veterans Affairs Supportive Housing HOMES Report via Homeless Management Information System. Reported Sept 9, 2024. Accessed May 22, 2025

**Source:**

## Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	75	453	N/A	N/A	3	N/A	N/A

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Not Hispanic	0	0	607	3,662	N/A	N/A	236	N/A	N/A
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

**Table 26 – Ethnicity of Public Housing Residents by Program Type**

**Data Source:** U.S. Dept of Housing and Urban Development. Assisted Housing: National and Local. HUD User. Published December 2024. [https://www.huduser.gov/portal/datasets/assthsg.html#query\\_2009-2024](https://www.huduser.gov/portal/datasets/assthsg.html#query_2009-2024). Accessed May 15, 2025.

**VASH (Veterans Affairs Supportive Housing) Data Source:** U.S. Dept of Veterans Affairs. Local Veterans Affairs Supportive Housing HOMES Report via Homeless Management Information System. Reported Sept 9, 2024. Accessed May 22, 2025

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

All three Public Housing Agencies (PHAs) in Lake County maintain lengthy waitlists. Last report indicates that of the households on the waitlist and 34% are disabled and may require accessible units.

**What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?**

In the most recent correspondence, the North Chicago Housing Authority reported over 200 households on the waiting list for public housing units and over 150 households on the housing choice voucher (section 8 tenant-based rental assistance) waiting list. North Chicago Housing Authority has indicated that residents of public housing and tenant-based units are in need of supportive services. Additionally, the most immediate need of voucher holders is more quality affordable units in North Chicago that will accept the housing choice voucher at a price that is attainable.

According to most recent report to Lake County, Waukegan Housing Authority has over 450 households on the waiting list for public housing units and over 150 households on the housing choice voucher (section 8 tenant-based rental assistance) waiting list. Waukegan Housing Authority has indicated that residents of public housing and tenant-based units are in need of supportive services such as legal help, counseling, and childcare.

Lake County Housing Authority has approximately 4,000 households on the waiting list for public housing units and 600 households on the housing choice voucher (section 8 tenant-based rental assistance) waiting list. Lake County Housing Authority has indicated that residents of public housing are in need of access to healthcare, transportation, and support services. Residents of housing choice vouchers are in need of assistance in securing a unit in low poverty areas, transportation, daycare, and utility assistance.

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

The supportive service needs are similar to the needs of the population at large to include a shortage of available affordable housing and high rental cost that exceed the allowed payment standards for Section 8 housing choice voucher participants; however, these participants often face unique challenges limited housing options in certain areas, and a need for housing that accommodates larger family sizes and disabilities.

## Discussion

The high number of households on the waiting lists for public housing units and housing choice vouchers indicate that housing cost continues to be a significant problem for thousands of households in Lake County.

As November 1, 2024, Lake County's three housing authorities entered into a collaborative agreement to expand housing options for the Housing Choice Voucher participants across the County. The collaboration seeks to provide greater flexibility to affordable housing opportunities. Under the new agreement, HCV participants from either housing authority can now rent eligible units throughout all of Lake County. The agreement will also streamline the leasing process for participants. The new system takes a significant step towards enhancing affordable housing and supporting the needs of the most vulnerable populations.

Lake County recognizes that Public Housing Agencies are crucial to providing much needed subsidies and programs and are committed to partnering with the local housing authorities to improve the implementation of programs that help Lake County's low-income residents.

## **NA-40 Homeless Needs Assessment - 91.405, 91.205 (c)**

### **Introduction:**

The Lake County Coalition for the Homeless is Lake County's Continuum of Care (CoC), which is also funded by the Department of Housing and Urban Development (HUD). The Final Rule Defining Homeless established the definitions that must be used for all Continuum of Care Programs.

### **HUD Definitions:**

#### **At-risk of Homelessness**

##### **Individuals and families who:**

1. Have an annual income below 30 percent of median family income for the area, as determined by HUD, and
2. Do not have sufficient resources or support networks, immediately available to prevent them from moving to an emergency shelter or place not meant for habitation, and
3. Exhibit one or more risk factors of homelessness, including recent housing instability or exiting a publicly funded institution or system of care such as foster care or a mental health facility

#### **Chronically homeless**

1. A homeless individual with a disability who lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and has been homeless and living there for at least 12 months continuously or at least 12 months on at least 4 separate occasions in the last 3 years, or
2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.



Homeless (includes four categories)

1. Literally Homeless: An individual or family who lacks a fixed, regular, and adequate nighttime residence, such as those living in emergency shelters, transitional housing, or places not meant for habitation, including an individual exiting an institution where he or she resided for 90 days and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, or
2. Imminent Risk of Homelessness: An individual or family who will imminently lose their primary nighttime residence (within 14 days), provided that no subsequent housing has been identified and the individual/family lacks support networks or resources needed to obtain housing, or
3. Homeless under other Federal Statutes: Unaccompanied youth under 25 years of age, or families with children and youth who qualify under other Federal statutes, such as the Runaway and Homeless Youth Act, have not had a lease or ownership interest in a housing unit in the last 60 or more days, have had two or more moves in the last 60 days, and who are likely to continue to be unstably housed because of disability or multiple barriers to employment, or
4. Fleeing/Attempting to Flee DV: An individual or family who is fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, and has no other residence, and lacks the resources or support networks to obtain other permanent housing.

Sheltered is used to describe a literally homeless individual or family who is living in an emergency shelter or transitional housing.

Unsheltered is used to describe a literally homeless individual or family who is living in a place not meant for human habitation, such as a car, tent, or outdoors.

#### Homeless Needs Assessment

Population	Estimate the # of <i>persons</i> experiencing homelessness on a given <u>night</u> .		Estimate the # of <i>persons</i> experiencing homelessness each <u>year</u> .	Estimate the # <i>becoming</i> homeless each <u>year</u> .	Estimate the # <i>exiting</i> homelessness each <u>year</u> .	Estimate the # of <i>days</i> people experienced homelessness.
	Sheltered	Unsheltered				

All People and Households	412	41	1359	617 ± 42	202 Households, or 36% of Homeless Experiencing Households.	127 ± 9
Persons in Households with Adults and Children ('Families')	311	1	765	170	80	163
Persons in Adult-Only Households (all over 18 years old)	2	0	578	502	113	148
Persons in Households with Only Children (all under 18 years old)	181	39	8	7	2	27
Chronically Homeless Households	48	8	127	61	47	350 days to housed & 278 days on the BNL
Households with Veterans	5	1	15	17	10	275
Unaccompanied Youth Households (all under 25 years old)	17	2	77	70	22	131
Persons with HIV	3	0	18	5	2	n/a

#### Data Limitations:

HUD mandates that all Continuums of Care oversee an HMIS database, a software application that records client information for individuals served by local homelessness programs. The tables below outline the data collected in HMIS, though it is essential to acknowledge its limitations.

First, the HMIS data presented here includes only individuals classified as literally homeless, the first category in HUD's definition of

homelessness. However, many more individuals and families require housing assistance beyond those who meet this specific criterion.

Second, for safety reasons, Domestic Violence agencies do not participate in HMIS.

Third, estimates of sheltered and unsheltered homelessness are derived from the Point-in-Time (PIT) Count, an annual HUD-mandated survey conducted each January. While the PIT Count provides valuable insights and serves as the only measure of unsheltered homelessness, its methodology has limitations, and it does not fully capture the extent of homelessness in any community.

### **HUD CoC System Performance Measures (SPMs) Analysis**

HUD has increasingly prioritized data-driven evaluation in funding decisions for local communities through the Continuum of Care Notice of Funding Availability (CoC NOFA).

The SPMs encompass seven key indicators established by HUD to assess the effectiveness of a community's homeless response system. These measures align with three overarching objectives: preventing homelessness whenever possible, minimizing its duration, and ensuring it does not recur. Communities must submit SPMs annually, along with PIT, HIC, APRs, and the Longitudinal Systems Analysis (LSA, formerly AHAR), as part of an extensive, data-driven reporting framework.

The SPMs in brief:

1. Length of time persons remain homeless
2. Extent to which persons who exit homelessness (are housed) do not return to homelessness
3. Number of homeless persons (participating in HMIS)
4. Employment and income growth for homeless persons in CoC Program-funded projects
5. Number of persons who become homeless for the first time
6. Homelessness prevention and housing placement of persons defined by category 3 of HUD's homeless definition in CoC Program-funded projects
7. Successful permanent housing placement

The following assessment will primarily focus on System Performance Measures (SPMs) 1, 2, 5 (including aspects of Measure 3), and 7. Measure 4 represents only a subset of programs and may not provide a comprehensive view of income and benefits across the community. Meanwhile, Measure 6 addresses homelessness prevention and housing placement for individuals categorized under Category 3 homelessness.

Category 3 homelessness is a complex designation that applies to unaccompanied youth or families with minor children who meet homelessness criteria under another federal statute or have a documented history of housing instability. However, they do not meet the stricter definitions of Category 1 (literal homelessness) or Category 2 (imminent risk of homelessness). Under HUD regulations, CoC funding cannot be used to serve this population without explicit approval, as outlined in 24 CFR 578.89.

The accuracy of these findings depends heavily on the quality of HMIS data and the reliability of key HUD reports, including the Housing Inventory Count (HIC), Point-in-Time (PIT) Count, and System Performance Measures (SPMs). While these reporting tools are complex, they are vital for analysis and essential for securing funding. In recent years, Lake County has made notable progress in strengthening data quality through a partnership with Community Solutions' Built for Zero initiative, which supports communities in using real-time data and coordinated systems to measurably and equitably end homelessness. This collaboration has enhanced the county's capacity to better understand and respond to the shifting dynamics of homelessness.

#### Measure 1: Average and Median Lengths of Stay in ES and ES+TH

Days in Shelter & TH	Fiscal Year					
	2019	2020	2021	2022	2023	2024
Average	76	96	126	129	110	144
Median	26	46	77	78	61	108

#### Measure 1: Length of Time Persons Remain Homeless

Measure 1 focuses on the duration individuals experience homelessness and is divided into two segments: one assessing time spent in emergency shelters (ES) and safe havens (SH), and the other incorporating stays in transitional housing (TH). It reports both the average and median number of days a person remains in these programs over the course of a year, regardless of how many times they enter or exit.

In the accompanying graph, average lengths of stay are consistently higher than median values, a gap that widens when transitional housing data is included. This discrepancy could stem from a combination of factors—data quality issues, the nature of specific

program types, or characteristics of the populations served.

From a data integrity standpoint, a frequent issue is the failure to close records in HMIS for individuals who have exited a program. These “open” records continue to accumulate days, skewing the average upward over time. Additionally, transitional housing programs that don’t receive federal funding may fall outside the routine data validation processes, such as the Annual Performance Report (APR) reviews and HMIS oversight.

On the service delivery side, it’s worth noting that transitional housing is often designed for longer stays—up to 24 months in some cases—which naturally inflates the average length of time compared to short-term emergency shelter programs.

While Measure 1 is a useful indicator, it captures only one dimension of a person’s experience with homelessness. Communities looking for a deeper understanding may supplement it with additional metrics that include more granular client or project-level data. These might incorporate HMIS and Public Housing Authority (PHA) data and track process milestones that can be improved through policy changes, streamlined systems, or stronger coordination among stakeholders.

#### Measure 2: Returns to Homelessness within 6, 12, and 24 months

Fiscal Year	2019 (exited in FY2017, started on 10/1/2016))		2020 (exited in FY2018)		2021		2022		2023 (clients exited after 10/1/2020)		2024 (clients exited after 10/1/2021)	
	Nat'l Avg.	Lake County	Nat'l Avg.	Lake County	Nat'l Avg.	Lake County	Nat'l Avg.	Lake County	Nat'l Avg.	Lake County	Nat'l Avg.	Lake County
Returns within 6 months	9.1%	11%	9.0%	3%	8.9%	11%	7.5%	7%	7.9%	1%	n/a	4%
Returns within 12 months	13.8%	16%	13.8%	7%	13.1%	18%	11.1%	12%	12.2%	5%	n/a	3%
Returns within 24 months	19.8%	25%	19.7%	12%	17.8%	24%	16.5%	19%	18.7%	9%	n/a	9%

#### Measure 2: Extent to which persons who exit homelessness do not return to homelessness

Measure 2 tracks the percentage of individuals who return to homelessness within 6, 12, and 24 months after exiting to a

permanent housing destination. This includes those who exited to stable living situations—such as rental housing, permanent supportive housing, or staying with friends or family—within the two years prior to the reporting period. A return is recorded if a person re-enters the homeless system during the specified timeframe, and the return rate is calculated by dividing the number of returns by the total number of permanent exits.

Over the past five years, Lake County has shown significant progress in reducing returns to homelessness. In 2019, the county's return rate within 24 months was 25%, well above the national average of 19.8%. By 2023, that figure had dropped to 9%, now falling well below the national average of 18.7%. A similar trend is seen at 6 and 12 months: the 6-month return rate declined from 11% in 2019 to just 1% in 2023, compared to a national rate of 7.9%.

This dramatic improvement may be attributed to both better data quality and stronger program outcomes. In the past, open or unclosed records in HMIS may have artificially inflated return rates. More timely and accurate data entry likely contributed to more reliable reporting. At the same time, improved coordination, targeting of resources, and housing stabilization efforts may have enhanced long-term housing outcomes for clients exiting the system.

It is important to interpret these numbers with care. Because the metric reflects exits from up to two years prior, recent gains may take time to fully appear in the data. Additionally, HMIS can only capture returns that occur within the formal system—those experiencing homelessness outside of HMIS-covered programs may not be reflected.

Further analysis at the program and population level—such as comparing outcomes across project types (e.g., RRH, PSH, HP) or household configurations—can provide valuable insights. This deeper dive can help identify where gaps remain and guide future efforts to prevent returns and sustain housing stability across all subpopulations.

**Measure 5: Number of Persons who Become Homeless for the First Time ES-SH-TH vs. ES-SH-TH-PH**

Fiscal Year	2019		2020		2021		2022		2023		2024	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
ES & TH, 1st Time Homeless	660	65%	748	68%	610	65%	819	71%	925	70%	1097	69%

<b>ES &amp; TH &amp; PH, 1st Time Homeless</b>	721	71%	850	77%	677	73%	855	74%	978	74%	1160	73%
<b>Total HMIS Count</b>	1013		1100		932		1149		1327		1600	

#### **Measure 5: Number of Persons who Become Homeless for the First Time**

Measure 5, which focuses on individuals experiencing homelessness for the first time, examines all persons who entered an HMIS-participating program during the reporting year and looks back over the previous two years to see if they had any prior contact with the homeless system. If no earlier records are found, the person is classified as newly homeless. This figure is then divided by the total number of people who experienced homelessness during the same period (Measure 3), producing a rate that reflects the proportion of first-time homelessness within the system.

This measure is broken into two parts—one that looks at individuals entering short-term crisis programs such as emergency shelters (ES), safe havens (SH), and transitional housing (TH), and another that includes both crisis and permanent housing programs, such as rapid re-housing (RRH) and permanent supportive housing (PSH). The purpose of this analysis is to evaluate how well the homelessness response system is functioning to prevent repeat episodes of homelessness.

The concept of “functional zero,” as defined by HUD, does not suggest that homelessness will be entirely eliminated. Rather, it envisions a system where homelessness is rare, brief, and nonrecurring. In that context, a higher percentage of first-time homelessness—especially when the overall number of people experiencing homelessness remains steady—may indicate progress. It suggests that fewer individuals are cycling through the system repeatedly, and that the community may be effectively helping people avoid long-term or recurring homelessness by responding quickly and appropriately to housing instability.

#### **Measure 7: Successful Permanent Housing Placement**

Also broken into two parts, the first (7a) measuring successful permanent housing placement from Street Outreach (SO) projects and the other (7b) measuring successful placement in from ES, Safe Haven (SH), TH, and RRH (7b1) or retention of permanent housing

from RRH or PSH projects (7b2).

For this assessment, Measure 7a will be used

**Measure 7a: Successful Permanent Housing Placement from Street Outreach**

Year	2020	2021	2022	2023	2024
Total Persons Exiting Street Outreach (SO)	81	80	97	62	115
Total Persons Exited SO to Temporary Destinations	14	57	26	10	74
Total Persons Exited SO to Permanent Destinations	58	9	37	7	17
Percent with Successful SO Outcome	77%	83%	65%	27%	79%

The outcomes of Measure 7a highlight both the challenges and opportunities faced by the county's small but dedicated street outreach team, which consists of just two individuals responsible for serving the entire county. In 2022, the team experienced a significant loss when one long-serving outreach staff member departed. This disruption is reflected in the noticeable decline in successful permanent housing placements, which dropped from 37 in 2022 to just 7 in 2023, along with the overall success rate falling to 27%, the lowest in the five-year span. The loss of institutional knowledge and community relationships likely impacted the team's ability to effectively navigate complex housing pathways. In response, the current outreach program is undergoing a strategic review to adopt a housing-focused framework as recommended by the National Alliance to End Homelessness. This approach aims to formalize procedures, align practices with national best standards, and strengthen the capacity of the outreach team to achieve more consistent and sustainable housing outcomes moving forward.

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

Not applicable; data is available for "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness".



## Nature and Extent of Homelessness: (Optional)

Race and Ethnicity	Sheltered:	Unsheltered:
American Indian, Alaska Native, or Indigenous (only)	0	1
American Indian, Alaska Native, or Indigenous & Hispanic/Latina/e/o	9	0
Asian or Asian American (only)	1	2
Black, African American, or African (only)	359	34
Black, African American, or African & Hispanic/Latina/e/o	4	0
Hispanic/Latina/e/o (only)	111	12
Native Hawaiian or Pacific Islander (only)	0	1
Native Hawaiian or Pacific Islander & Hispanic/Latina/e/o	1	0
White (only)	87	20
White & Hispanic/Latina/e/o	37	3
Multi-Racial & Hispanic/Latina/e/o	6	0
Multi-Racial (all other)	15	2

Data Source: 2024 PIT/HIC Report

\*Any Race/Ethnicity with a reporting total of zero were not included in the table

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

Families: All low-income families who are cost burdened or severely cost burdened are in need of housing assistance; however, for the purposes of this section, families in need of housing includes those at imminent risk of homelessness and those who are literally homeless.

- As discussed in section “NA-10 Housing Needs Assessment” above, families at imminent risk of homelessness includes all families served by Homelessness Prevention and Diversion Programs. In Federal FY 2024, Prevention and Diversion programs reported working with 2,242 individuals (885 households). Of that 885 households, 465 were families for a total of 1,049 children.
- Families who are literally homeless includes all those who are living in a shelter (sheltered) or a place not meant for human habitation (unsheltered). In FY 2024, 966 persons (approximately 269 families) in family households with both adults and children experienced homelessness, equaling approximately 61% of all individuals who experienced homelessness. This number includes youth families, where the head of household is under age 25.

- The 2025 PIT Count found 114 sheltered families (391 individuals) with both adults and children, equaling approximately 71% of all sheltered individuals found. The 2025 PIT Count found 0 unsheltered families.
- Additionally, the Regional Office of Education reported 1,962 homeless students in 2024.

Veterans: All low-income veterans who are cost burdened or severely cost burdened are in need of housing assistance; however, for the purposes of this section, veterans in need of housing includes those at imminent risk of homelessness and those who are literally homeless.

- As discussed in section “NA-10 Housing Needs Assessment” above, families at imminent risk of homelessness includes all families served by Homelessness Prevention and Diversion Programs. In Federal FY 2024, 12 veterans were served, approximately less than 1% of all individuals served by these programs.
- Families who are literally homeless includes all those who are living in a shelter (sheltered) or a place not meant for human habitation (unsheltered). In FY 2024, 38 veterans experienced homelessness
- On December 31, 2018, Community Solutions certified Lake County as having achieved Functional Zero for veteran homelessness, making it the 10th community in the nation to do so. This designation indicates that Lake County established a system in which the number of veterans entering homelessness is consistently lower than the number being housed, and that any veteran experiencing homelessness is quickly identified and connected to housing resources. The current by-name list of veterans experiencing homelessness remains certified as high-quality, meeting all 10 criteria required for accurate data tracking and coordinated outreach. On July 2, 2019, the Coalition formally announced an end to veteran homelessness in Lake County. Since then, the county has successfully maintained Functional Zero, demonstrating the continued effectiveness and sustainability of its veteran homelessness response system.

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

The table above includes individuals identified in the 2024 Point in Time (PIT) Count. Of those identified, 393 (52.5%) identified as Black, African American, or African (including those who also identified as Hispanic/Latina/e/o), while 147 (19.6%) identified as White (including those who also identified as Hispanic/Latina/e/o). A total of 14 individuals (1.9%) identified as Asian or Asian American, and 17 individuals (2.3%) identified as Multi-racial (all other). Additionally, 9 individuals (1.2%) identified as American Indian, Alaska Native, or Indigenous (including multi-ethnic responses), and 2 (0.3%) identified as Native Hawaiian or Pacific Islander.

In terms of ethnicity, 164 individuals (21.9%) identified as Hispanic/Latina/e/o (across all racial categories). The remaining 585 individuals (78.1%) identified as non-Hispanic.

As noted in the introduction above, the PIT Count has limitations and may not capture all individuals experiencing homelessness. To assess potential racial disparities in the provision or outcomes of homeless assistance in Lake County, the Lake County Coalition for the Homeless conducted the 2023 Coordinated Entry Report (October 1, 2022 – September 30, 2023). The analysis draws on Coordinated Entry System (CES) data, which provides insight into system access, prioritization, referrals, and housing placements by race and ethnicity. In FY 2023, of the 1,204 individuals assessed through CES, 58.9% identified as Black or African American, 34.9% as White, and 17.3% as Hispanic or Latinx (of any race). Black or African American individuals continue to be overrepresented in the homeless population, making up nearly 59% of those assessed through CES, while comprising only 7.8% of the general population in Lake County.

Importantly, the 2023 analysis extended beyond representation to examine access and outcomes. It found that Black and African American individuals were prioritized and referred to housing at similar or slightly higher rates than White individuals. Specifically, 70.3% of Black individuals assessed were prioritized for housing compared to 69.6% of White individuals, and 58.8% of Black individuals received a housing referral versus 57.7% of White individuals. Among those referred, 52.2% of Black clients were housed compared to 55.2% of White clients. These small differences do not suggest significant disparities in housing outcomes, though continued monitoring is warranted.

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

The sheltered and unsheltered count described in the “Nature and Extent of Homelessness” and “Homeless Needs Assessment” tables above are taken from the Point in Time (PIT) Count. As mentioned in the introduction above, the PIT Count has several limitations which may underrepresent total numbers of residents experiencing homelessness. While the 2025 PIT Count indicates approximately 561 sheltered homeless individuals, the total number of unduplicated sheltered homeless persons in Lake County in FY2024 was 1,600.

### **Discussion:**

The Lake County Coalition for the Homeless has recently completed its updated Analysis of Racial Disparity within the Homeless Services System, drawing on data from the FY2024 Longitudinal Systems Analysis (LSA). The report confirms a continued and significant overrepresentation of Black or African American individuals within the homeless population. Although Black residents comprise only 7.8% of Lake County’s total population, they represent 58% of people experiencing homelessness.

Despite this overrepresentation at the point of entry into the homeless system, the analysis found that outcomes for Black or African American individuals are largely comparable those for White individuals. For example, the average cumulative length of time homeless for Black households was 189 days, slightly lower than the 210-day average for White households. Similarly, return rates to homelessness within six months after exiting to a permanent destination were nearly identical—18% for Black households and 19% for White households—suggesting comparable short-term housing stability across racial lines.

While the overall rate of exits to permanent housing was 33% for all households, 29% of Black or African American households achieved this outcome, compared to 38% of White households. Though this difference indicates room for improvement, it is less pronounced than in previous years. Hispanic or Latino individuals made up 21% of those served in FY2024, and their short-term return rate was 17%, closely aligning with the 19% return rate for non-Hispanic clients.

## **NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d)**

### **Introduction**

The primary groups with non-homeless special needs in Lake County are the elderly and disabled (physical or mental). Other groups such as foreign-born residents and those with limited English proficiency, and households that are otherwise low/moderate income additionally require the attention of social service providers in the County. This section will explain more about these households, their needs, and how the County is accommodating or should accommodate these individuals.

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

#### **Elderly**

The elderly (65+) make up almost 16.5% of the Lake County Population. An increase of 2.8% since the last consolidated plan was completed five years ago. They tend to be white, female, and married or widowed at similar rates to the general US population. 23.7% of this group are disabled. 7.3% of this group live at or below the poverty rate which is approximately 15,978 people over 65 years of age with extremely limited means to maintain a healthy lifestyle. (Source: American Community Survey 2023).

#### **Disabled**

Disability is defined as having a serious hearing or vision deficit, cognitive difficulty, serious difficulty walking or managing stairs, difficulty bathing or dressing, or meaningful independent living difficulties. 10.5% of the Lake County population is considered disabled which is a 1.6% increase for this population from the time of the last consolidated plan. Of the working age adults with a disability 53.7% did not work in the last year of record. Less than 1/3 of the disabled working age population maintained full time employment (31%). Working age adults who were employed earned only 79% of the area median income overall. Women in this group earned 27% of the area median income (Source: American Community Survey 2023).

Regarding behavioral health specifically, 17.3% of the Lake County population have been diagnosed with depression. While this group is 10x more likely to consider suicide, suicide is no longer in the top 10 cases of death among Lake County residents as of 2020. (source: Lake County Health Dept.) 31% of 8<sup>th</sup> graders, 37% of 10<sup>th</sup> graders and 36% of 12<sup>th</sup> graders in Lake County report feeling so sad or hopeless almost every day for two weeks or more in a row to a degree that they were stopped from doing some usual activities. Countywide, 16.3% of adults report having a day or more in the past month where their mental health status prevented them from carrying on usual activities. (Source: Lake County Health Dept.)

#### **Other**

Overall, 8.1% of Lake County residents are living below the poverty level. The percentage of low-income households has increased in the northern half of the County over the last fifteen years with 13% of the population of the northern half of the County below the poverty line ([chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hfnlc.org/wp-content/uploads/2022/05/HFNLC-Needs-Assessment-2022-5-11-22-FINAL.pdf](https://www.hfnlc.org/wp-content/uploads/2022/05/HFNLC-Needs-Assessment-2022-5-11-22-FINAL.pdf)). A large percentage of the County as a whole are foreign born (19.5%) with 31% of households speaking a language other than English in their homes (ACS 2023).

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

For all the populations noted, the number one barrier to housing is affordability.

Supportive service needs for these populations are specific to the individuals ranging from one-time assistance to support a household through a change to permanent supportive housing options for those that require it.

These determinations are made by the organizations providing the care in the community and would ideally be part of a coordinated effort that ensured every need of the individual are met.

Area studies point toward the need for improved transit options for these households as well as a better coordinated service system in general to provide a better safety net for households that experience crises.

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

A 2024 survey found approximately 1,041 residents in the County living with HIV and AIDS. (<https://dhs.illinois.gov>) In Illinois, on average, this population is 80% male, 43% black, 22% Hispanic and 25% white. (<https://aidsvu.org/local-data/>)

**If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))**

No preference will be established.

### **Discussion:**

The elderly and disabled populations in Lake County are increasing. Low-income households and those living under the poverty level will continue to require assistance from the nonprofit and government sectors. With strategically delivered resources, the County can maximize the impact of their dollars to benefit these most in-need groups.

## **NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)**

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

Successful public spaces/facilities can be used create a strong sense of community and assist in overall community outreach efforts. Placemaking efforts can look to public and private spaces that incorporate elements of historic preservation, architecture, public art, street art and others. Capitalizing on these assets in LMAs should be the potential to address community economic development needs by attracting tourists, private investment and generate an overall sense of pride within the community.

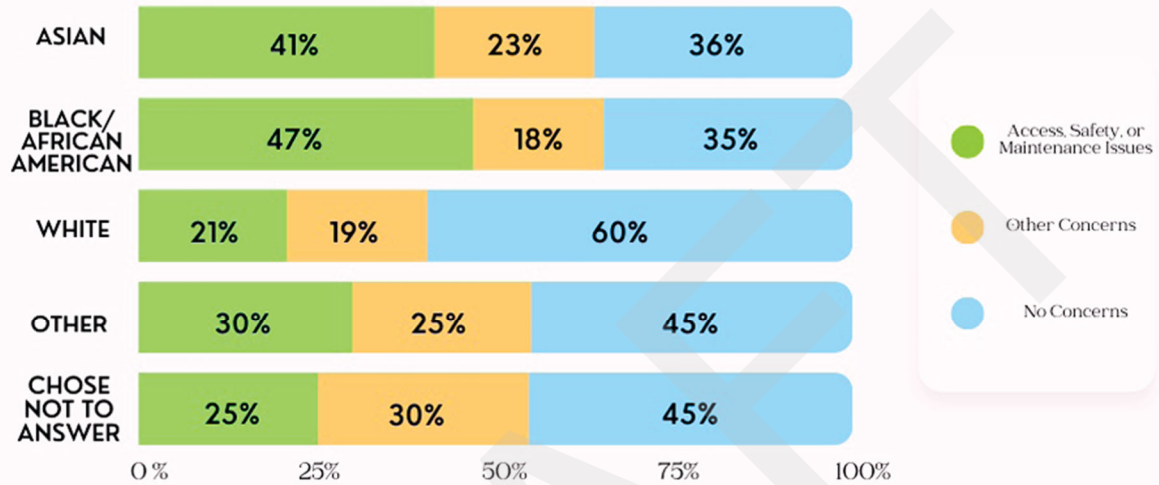
Additionally, public facilities housing nonprofits are in continual need by the community. These agencies have budgets that are often strained despite the increasing need for services. Many agencies have been forced into existing spaces not designed for their needs. Ongoing attempts to retrofit facilities to a more functional setup often get shelved due to lack of funding. Tight budgets don't allow for facility expansion, updates or improvements. The services provided by these facilities improve the overall quality of life opportunities available to County residents. The County recognizes the valued services of the non-profits and the need for public facilities.

A significant opportunity for the Lake County Consortium is to continue support of service agencies by funding CDBG-eligible capital improvements to community public facilities.

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

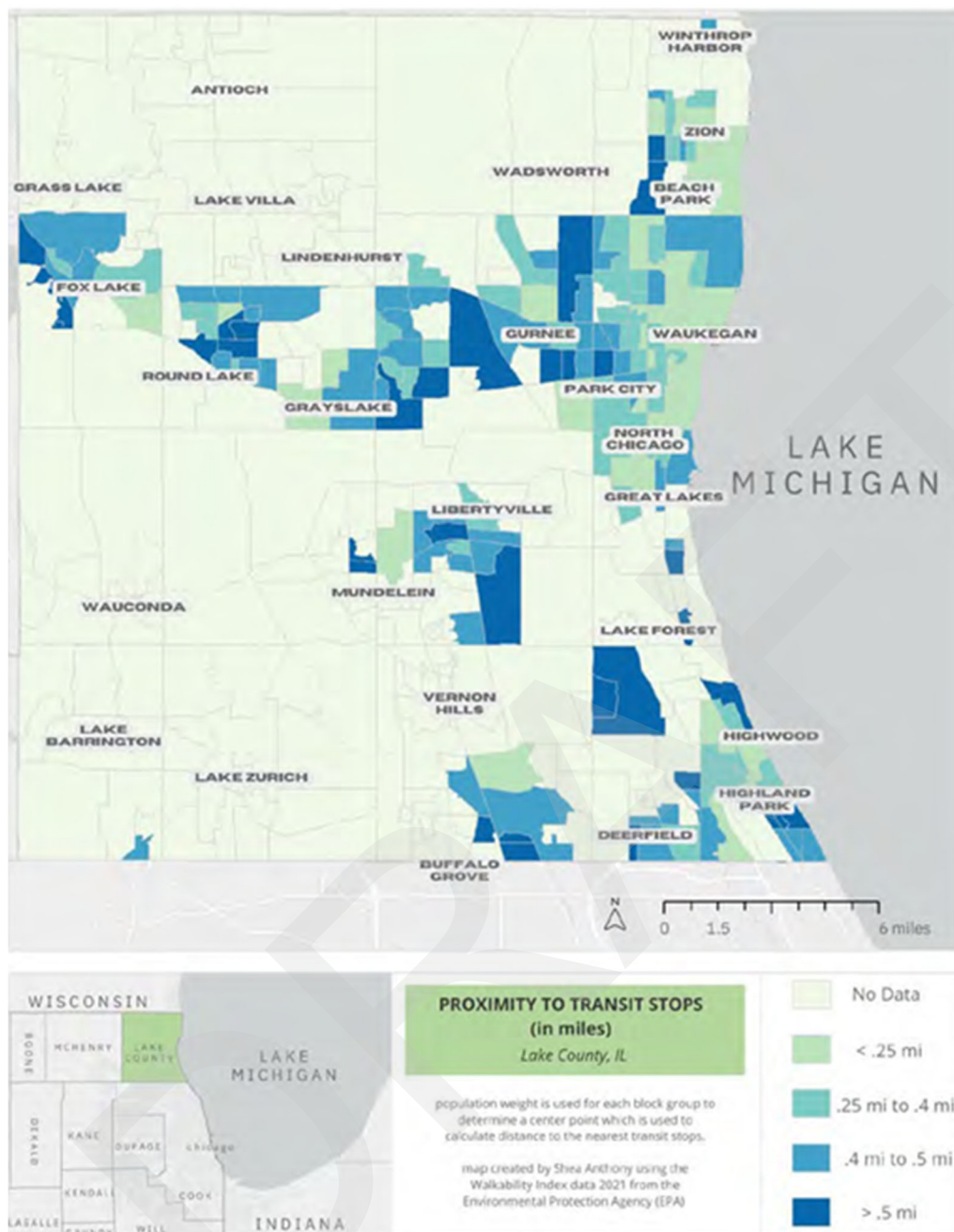
The needs were determined through a combination of public meetings, staff experience and interagency communication. According to the study conducted by the Brushwood Center at Ryerson Woods, 48% of Lake County residents have concerns about visiting parks and open spaces. Lake County, IL contains significant green space and bodies of inland water to explore. Of the 7,243 documented bodies of water identified by Ryerson Woods there are 260 Lakes, 6,814 Ponds and 169 Rivers/Streams/Creeks, including the Des Plaines River, Fox River, Grassy Lake, Independence Grove Lake, Lake Carina, Sun Lake and the North Branch of the Chicago River. For many residents the distance to the parks is a barrier, requiring a car to get there. Below is a map that demonstrates the proximity to transit stops, much of the County does not live in close proximity to transit stops.

## What concerns, if any, do you have with visiting parks or open spaces?



Data comes from Question 41 of the Lake County Community Health Status Assessment Survey Published in June 2022





## Describe the jurisdiction's need for Public Improvements:

Flooding is a consistent issue for Lake County. The physical geography, urban development and the relatively flat regional topography all contribute to Lake County's flooding issues. Flooding causes problems for road and rail transportation, utility outages and sewer overflows. All of which lead to personal and financial stresses for Lake County residents.

Much of the existing infrastructure was designed using standards that pre-date the increased number of heavy rain events, freeze-thaw cycles, and hotter and wetter conditions posed by a changing climate. The Lake County Watershed Development Ordinance (WDO) requires the use of the Rainfall Depth-Duration Frequency Tables for Lake County for regulatory design criteria. These rainfall amounts are used to calculate and size stormwater infrastructure such as storm sewers and detention basins. The design rainfall data are referenced from the 2020 Illinois State Water Survey Bulletin 75 publication, which is based on observed precipitation data between roughly 1948 and 2017. An initial evaluation indicates that the revised rainfall amounts for Lake County are between 20% and 45% higher than those currently used. Increased frequency and intensity of rainfall events will stress existing infrastructure and represents a natural hazard risk for all Lake County residents.

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

The needs were determined through a combination of public meetings, surveys, staff experience, research and interagency communication. Data was used from the Illinois State Water Survey Bulletin 75, published March 2020.

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

The 2019 Community Needs Assessment focused on the Latinx community performed by service provider Mano a Mano reported a greater need for mental health counseling (52%), health services in languages other than English (31%) and drug/alcohol counseling (24%). According to this assessment, which was authored by Leading Healthy Futures, there is “increased awareness, recognition and acceptance of these issues in the community.”

This study also “pointed to young adults aged 18-25 as a group of interest with particular needs that many not be adequately served,” a finding repeated in the Gap Analysis of the Homeless Crisis Response system that facilities and services for youth without a home are significantly lacking.

In its preparation for introducing The Josselyn Lake County Center for Mental Health, this agency noted that 24% of its clients at its Northfield Center – a northern suburb in Cook County – were coming from Lake County.

During Consultations, outlined in PR-10, a reoccurring theme presented of a need for additional Mental Health services. This ranged from non-profit agencies providing services to survivors of domestic violence, housing providers, senior services and employment services. The needs focused on access, both in terms of transportation accessibility and short wait lists, affordability and stigma.

Looking at other funding sources that support public services, Lake County noticed the need to target CDBG Public Service dollars at transportation, adaptive equipment and programing focused on serving the Low Income Population while other funding sources (e.g. Lake County Community Foundation & FEMA's Emergency Food & Shelter Program) provided basic needs funding and the non-profit segment

of the health care sector receives steady support from the Healthcare Foundation of Northern Lake County. An example of a pressing public service need is the need for more public transit routes to include the Robert W. **Depke Juvenile** Justice Complex and Minard E. Hulse **Juvenile Detention Center** in Vernon Hills. This Complex is the only site for Lake County court cases involving children but is difficult to reach without a car. From the eastern side of Lake County, it currently requires two hours of time each way to visit Depke.

All of these factors contribute to significant hurdles and indicate need areas that could be addressed via public services.

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

An assessment of the region using studies and statistical data presented several data affecting Lake County public service needs:

As of 2022, 10% of the population's households used food stamps (U.S. Census). As of this same period 4.4% of the population was unemployed (Federal Reserve Bank of St. Louis) and 7.4% of the population had no health insurance (U.S. Census). About 9.4% of the population has a disability of some kind (CMAP). 9.9% of the population in the County speak English Less than "Very Well." (CMAP) 9.2% of the eligible population have less than a high school degree. (CMAP)

Additionally, 38.8% of the Lake County population report having at least one day per month where they felt their mental health was not good. 16.3% of the population felt that 8 or more days were not good. (Lake County Health Dept.)

# Housing Market Analysis

## MA-05 Overview,

### Housing Market Analysis Overview:

Lake County is facing a housing deficit across all types. “Between 2018 and 2022, new residential development averaged only 1,200 units per year, well below the near and long-term household projected needs by ESRI and CMAP. This will result in a significant shortage over time.” (Kretchmer et al., 2023) The shortage in supply has led to dramatic increases in the cost of housing. “The median single-family detached home price in Lake County was \$377,000 in 2022, a 37% or \$101,500 increase in three years.” (Kretchmer et al., 2023) The high cost of housing is negatively impacting Lake County rental households, especially low and moderate-income households. Over one third (37%) of rental households earning between \$50,000 and \$75,000 are housing costs burden (>30% income spent on housing).

More home construction is needed in Lake County across the range of prices and types. This includes housing for all income groups, from low to high-income households, and for all age groups. (Kretchmer et al., 2023)

## MA-10 Housing Market Analysis: Number of Housing Units - 91.410, 91.210(a)&(b)(2)

### Introduction

This section provides an overview of Lake County's housing stock by type and size of unit.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	179,407	66%
1-unit, attached structure	27,962	10%
2-4 units	15,688	6%
5-19 units	21,817	8%
20 or more units	20,687	8%
Mobile Home, boat, RV, van, etc	4,522	2%
<b>Total</b>	<b>270,083</b>	<b>100%</b>

**Table 27 – Residential Properties by Unit Number**

Data Source: 2019-2023 ACS - DP04

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	380	0%	3,258	5%
1 bedroom	2,320	1%	16,083	27%
2 bedrooms	32,866	17%	24,386	40%
3 or more bedrooms	164,221	82%	16,729	28%
<b>Total</b>	<b>199,787</b>	<b>100%</b>	<b>60,456</b>	<b>100%</b>

**Table 28 – Unit Size by Tenure**

Data Source: 2019-2023 ACS - B25042

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

Lake County assists households with housing utilizing primarily federal Community Development Block Grant (CDBG) and Housing Investment Partnership (HOME) funds. Lake County also has local funds available through its Lake County Affordable Housing Program. These grant programs require income targeting, meaning that the funds must be used to help households at or below predetermined income levels. A household's income level is measured by how it compares to the Area Median Income (AMI), or the median income of households in the Chicago Metropolitan Statistical Area.

CDBG is intended for low- and moderate-income households, which are defined as any household with an income at or below 80% of the Area Median Income. If housing is funded with CDBG funding, at least 51% of the units must be occupied by low- and moderate-income households according to CDBG

standards. This means the majority of households benefitted by CDBG funds must be at or below 80% AMI.

HOME is intended for low-income, very low-income (VLI), and extremely low-income (ELI) families, which are defined as any household with an income at or below 80% AMI, 50% AMI, and 30% AMI, respectively. 100% of units funded with HOME funding must benefit low-income households according to the HOME standards. This means 100% of beneficiaries of HOME funds must be at or below 80% AMI.

Due to the extremely high cost of housing in Lake County, AHP can serve households earning up to 100% AMI.

Lake County anticipates serving roughly 800 total units, including 400 households with incomes less than or equal to 50% of the Area Median Income and 400 households with incomes less than or equal to 80% of the Area Median Income.

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

Lake County believes that the preservation of existing affordable housing units is as important as the development of new affordable housing units and accepts funding applications from low-income housing developments which would be able to maintain affordability with Affordable Housing Funding. The housing subsidies for five HUD-funded multifamily buildings (228 units) expire during this HUD Strategic Plan 2020-24 timeframe, so preservation efforts may be necessary.

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

According to the 2023 Census General Housing Characteristics data, out of approximately 271,341 total housing units in Lake County, about 11,098 units (or 7.1%) are vacant. Units are considered vacant if they are for rent and vacant 2,586 (23%), rented but not yet occupied 309 (3%), for sale and vacant 1,245 (11%), sold but not yet occupied 518 (5%), for seasonal/recreational/ occasional use and vacant 3,141 (28%), for migratory workers and vacant 0 (0%), or other vacant 3,299 (30%). This breaks down to a .87% vacancy rate for homeowner units and 4.57% vacancy rate for rental units. The US Census Bureau Current Population Survey/Housing Vacancy Survey estimates the vacancy rate for 2023 across the United States to be about .9% for homeowner units and 6.6% for rental units.

Homeowner vacancy rate has dropped significantly from 2.3% in 2010 to .87% in 2023. This suggests that fewer homes are sitting unsold and vacant, indicating increased housing demand and tighter housing market for homeownership. The rental vacancy rate has nearly halved from 8.6% in 2010 to 4.57% in 2023. This indicates that rental housing is now much more occupied, likely due to higher demand for rental units and limited supply.

While the vacancy rate suggests there are available housing units, the percentage of Lake County residents who are cost-burdened or severely cost-burdened indicate that the available housing does not meet the needs of the population.

As mentioned above in NA-10, the 2019–2023 ACS 5-Year Estimates (Table: B25106) indicate that 28.1% of owner-occupants with a mortgage, 13.3% of owner-occupants without a mortgage, and 44.7% of renter-occupied households in Lake County pay more than 30% of their household income toward housing costs.

There is a clear and pressing need for more affordable housing units in Lake County, particularly for low- and moderate-income households. Despite the presence of vacant housing, a significant portion of the population continues to experience housing problems, indicating a mismatch between available units and community needs.

According to the 2023 Census General Housing Characteristics data, approximately 7.1% of Lake County's 271,341 housing units are vacant. However, only a small share of these units are actively available for occupancy—2,586 units (23%) are for rent and 1,245 units (11%) are for sale. Other categories, such as seasonal use (28%) and "other vacant" (30%), suggest that many vacant units are not suitable or accessible for year-round residents. The homeowner vacancy rate in Lake County is just 0.87%, and the rental vacancy rate is 4.57%, both lower than national averages (0.9% and 6.6%, respectively). This decline in vacancy since 2010 underscores an increasingly tight housing market and rising demand across both ownership and rental sectors.

While vacancy rates suggest that some housing stock exists, affordability remains a critical barrier. The 2019–2023 ACS 5-Year Estimates (Table B25106) reveal that 28.1% of owner-occupants with a mortgage, 13.3% of those without a mortgage, and 44.7% of renters are cost-burdened, spending more than 30% of their income on housing. These figures highlight a widespread affordability challenge, particularly for renters.

Further underscoring this issue, CHAS data show high rates of housing problems and severe housing problems across income levels. Households earning 0–30% of the Area Median Income (AMI) experience one or more housing problems at a rate of 79.4%, and severe problems at 69.5%. Even among households earning 30–50% of AMI, 80.8% face housing problems and 44.6% face severe issues. As income increases, the prevalence of these problems declines—but the correlation between lower income and more severe housing conditions remains stark.

Although CHAS data do not specify the breakdown of issues like substandard conditions or overcrowding, the persistence of these housing problems—despite overall vacancy—demonstrates that the available housing stock is neither affordable nor appropriate for many residents. The need for safe, affordable, and suitable housing is particularly acute for the county's lowest-income households.

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

An increase in affordable housing units is needed to meet the needs of the many cost-burdened residents of Lake County, an increase in the size of units is required to meet the needs of the many households experiencing overcrowding or severe overcrowding, and an increase in the quality of the units is required to meet the needs of the many households experiencing substandard housing

conditions. Seniors and people with disabilities need accessible housing units, preferably in walkable communities.

## **Discussion**

The number of households experiencing housing problems or severe housing problems indicates that the units currently available in Lake County do not meet the needs of its residents. As recommended by the Chicago Metropolitan Agency for Planning (CMAP), local housing must match the types that residents want. ([www.cmap.illinois.gov/2050/community/housing](http://www.cmap.illinois.gov/2050/community/housing))

CMAP's On To 2050 Plan continues, "The region's housing supply must adapt to meet global shifts and local needs that include an aging population and changing living patterns. As demographics change, so does the type and location of the housing that people want. Research found that the market can be impeded from meeting such changes in demand by various barriers, including both the community's lack of alignment between planning, zoning, and approvals processes and the extent to which its residents accept proposed housing developments."



## MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a)

### Introduction

In its 2025 Gap Report, the National Low Income Housing Coalition (NLIHC) found that for every 100 extremely low-income renter households in the United States, only 35 affordable and available units exist—highlighting a persistent and severe national housing shortage. This is reinforced by the 2024 State of the Nation’s Housing report from the Harvard Joint Center for Housing Studies, which underscores that housing costs have continued to rise faster than incomes, especially for renters, and that cost burdens have become more widespread and severe since the pandemic.

Recent trends in Lake County mirror these national patterns. Between 2010 and 2023, median contract rent increased by 51%, while the median home value rose by only 13%, indicating growing pressure on renters. This section reviews actual housing costs in Lake County and compares them to the HUD HOME rent limits, which represent the maximum allowable rents for units subsidized through the HOME Investment Partnerships Program.

As of FY 2025, the Fair Market Rent (FMR) for a two-bedroom unit in Lake County is \$1,761, compared to a High HOME Rent of \$1,618 and a Low HOME Rent of \$1,261. The 2023 median contract rent of \$1,253 does not include utilities, meaning that actual gross rent for many households exceeds both Low HOME limits and affordability thresholds for those earning 50% of the area median income (AMI). These conditions underscore the critical need to develop and preserve deeply affordable housing units and to structure housing strategies around income-aligned rents that are accessible to the county’s lowest-income residents.

### Cost of Housing

	Base Year: 2010	Most Recent Year: 2023	% Change
Median Home Value	287,300	326,600	13%
Median Contract Rent	830	1,253	51%

Table 29 – Cost of Housing

Data Source: 2010 Census (Base Year), 2019-2023 ACS - B25077, B25058

Rent Paid	Number	%
Less than \$500	3,168	5%
\$500-999	10,188	16%
\$1,000-1,499	20,884	32%
\$1,500-1,999	16,305	25%
\$2,000 or more	12,714	19%
No cash rent	2,438	3%
<b>Total</b>	<b>65,697</b>	<b>100%</b>

Table 30 - Rent Paid

## Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	4,955	No Data
50% HAMFI	17,699	12,796
80% HAMFI	38,735	38,426
100% HAMFI	61,389	106,766
<b>Total</b>		

**Table 35 – Housing Affordability**

Data Source: 2017-2021 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,458	1,560	1,761	2,262	2,657
High HOME Rent	1,255	1,346	1,618	1,860	2,056
Low HOME Rent	981	1,051	1,261	1,457	1,626

**Table 36 – Monthly Rent**

Data Source: FY 2025 HUD FMR and 2024 HOME Rents

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

As discussed in MA-10, cost burden data and housing problem indicators reveal that available housing in Lake County does not adequately meet the needs of all income levels. According to the 2017–2021 CHAS data, only 4,955 rental units are affordable to households earning ≤30% of HAMFI, with affordability increasing at higher income tiers (up to 61,389 units for ≤100% HAMFI). However, the gap at the lowest income levels is significant.

Severe housing problems are also concentrated among lower-income households:

- 69.5% of households earning ≤30% HAMFI experience one or more severe housing problems,
- Compared to 11.4% for those at 80–100% HAMFI.

This trend clearly indicates that as income decreases, the incidence of cost burden, overcrowding, and substandard housing increases. There is a pressing need for more affordable, decent, and adequate housing for low- and moderate-income households across Lake County.

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

From 2010 to 2023, the median home value in Lake County increased from \$287,300 to \$326,600 (+13%), while the median contract rent surged from \$830 to \$1,253, a 51% increase. This far outpaces wage growth, putting greater pressure on renters in particular. Without comparable increases in income, these trends point to continued housing cost burdens for many residents, particularly renters and first-time homebuyers. If current trends persist, housing affordability will continue to erode, especially for extremely low- and very low-income households.

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

In 2025, HUD set the Fair Market Rent (FMR) for a 2-bedroom unit in Lake County at \$1,761. By comparison, the High HOME Rent is \$1,618, and the Low HOME Rent is \$1,261. The 2023 median contract rent in Lake County is \$1,253, but this figure does not include tenant-paid utilities.

When comparing HOME rents to the gross rent (rent plus utilities), the FMRs and even High HOME Rents are above what a very low-income household at 50% AMI could afford. A household at this income level would likely be cost burdened even with access to a unit priced at the Low HOME Rent limit.

This mismatch reinforces the importance of preserving and developing housing units that meet HUD affordability standards, especially for households earning  $\leq 50\%$  HAMFI. Without public subsidy or regulatory intervention, the private market does not supply adequate affordable units at these levels.

## **Discussion**

Lake County continues to face a significant mismatch between housing costs and income, particularly for households at the lowest income levels. Rising home values and rents—especially the 51% increase in median rent since 2010—combined with limited income growth have exacerbated affordability challenges. The number of affordable units for extremely low-income households remains well below demand, and housing problems—such as overcrowding and substandard facilities—are most concentrated among these income groups.

To meet the needs of all residents, Lake County must invest in strategies that increase the supply of deeply affordable housing, preserve existing affordable stock, and support income-based rental assistance to close the affordability gap.

## MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a)

### Introduction

The tables below provide details of Lake County's housing stock including the numbers with selected conditions, age of units, and risk of lead-based paint hazard. The Condition of Units table is based on 2018-2022 American Community Survey data. There are four "selected conditions," including lack complete kitchen facilities, lacks complete plumbing facilities, more than one person per room, and cost burden greater than 30%. These housing problems are discussed in further detail in the Needs Assessment sections above, particularly sections NA-10, NA-15, NA-20, NA25, and NA-30.

### Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

The Lake County Planning, Building and Development Department regulates building construction, safety, and maintenance in unincorporated areas of Lake County. It is a public nuisance to rent or lease quarters for human habitation that, as determined by the Health Officer, are unfit for human habitation, or present/contain conditions that are detrimental to the health of the inhabitants, including but not limited to: a lack of potable water supply or a lack of adequate means of wastewater disposal. In other words, Lake County government mandates that housing in the unincorporated areas have running water and wastewater systems. The municipalities within Lake County have each adopted various versions of the International Building Codes for residential structures.

While there is no single definition for "substandard condition," Lake County will only utilize HUD HOME, CDBG, or NSP funds on rehabilitation if the rehabilitation work will bring the unit up to the standards described in the Lake County Consortium Property Rehabilitation Standards document. Furthermore, the property must be able to be brought up to the standards described while remaining under the limits proscribed by HUD, including the Maximum Per-Unit Subsidy and HOME Homeownership Value Limits. The Lake County Consortium Property Rehabilitation Standards incorporate various codes, regulations, standards, and guidelines, and regulation on Lead-Based Paint Hazards in Federally-Owned Housing and Housing Receiving Federal Assistance.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	41,804	21%	28,575	44%
With two selected Conditions	550	1%	2,258	4%
With three selected Conditions	91	0%	58	0%
With four selected Conditions	0	0%	0	0%

No selected Conditions	148,518	78%	34,806	52%
<b>Total</b>	<b>190,963</b>	<b>100%</b>	<b>65,697</b>	<b>100%</b>

**Table 37 - Condition of Units**

**Data Source:** 2023: ACS 5-Year Estimates – Table: B25123

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	37,855	20%	12,180	19%
1980-1999	66,231	35%	20,990	32%
1950-1979	66,168	35%	22,978	35%
Before 1950	20,679	10%	9,549	14%
<b>Total</b>	<b>190,933</b>	<b>100%</b>	<b>65,697</b>	<b>100%</b>

**Table 38 – Year Unit Built**

**Data Source:** 2023: ACS 5-Year Estimates – Table: B25036

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	86,847	45%	32,527	50%
Housing Units build before 1980 with children present	21,788	12%	15,723	24%

**Table 39 – Risk of Lead-Based Paint**

**Data Source:** 2023: ACS 5-Year Estimates – Table: B25034 (Total Units) 2016-2020 CHAS (Units with Children present)

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	11,098	0	11,098

**Table 40 - Vacant Units**

**Data Source Comments:**

\*Vacant Units based on 2023 ACS Table: B25004

## Describe the need for owner and rental rehabilitation based on the condition of the jurisdiction's housing.

Lake County's housing stock is aging, with a significant portion more than 20 years old. According to the 2023 ACS 5-Year Estimates, 80% of owner-occupied units and 81% of renter-occupied units were built

prior to 2000. Renter-occupied housing tends to be older, with 49% of rental units built before 1980, compared to 45% of owner-occupied units.

Condition data also shows need for investment. About 22% of owner-occupied units and 48% of renter-occupied units have at least one selected housing problem (such as lacking complete kitchen facilities, plumbing facilities, or experiencing overcrowding or severe cost burden).

The Community Partners for Affordable Housing (CPAH) maintains a long waiting list for Lake County's Owner-Occupied Rehabilitation Program, demonstrating strong demand for repairs that preserve existing housing. Addressing the rehabilitation needs of aging homes, particularly in low- and moderate-income neighborhoods, will be crucial to maintaining safe, decent, and affordable housing stock.

**Estimate the number of housing units within the jurisdiction that are occupied by low or moderate-income families that contain lead-based paint hazards. 91.205(e), 91.405**

HUD identifies housing built before 1980 as having potential lead-based paint hazards. Based on the 2023 ACS 5-Year Estimates, 45% of owner-occupied units (approximately 86,847 units) and 50% of renter-occupied units (approximately 32,527 units) in Lake County were built before 1980. Children living in these households face the greatest health risks from exposure to deteriorating lead-based paint. Rental units present a particular concern, as extremely low-income households are more likely to be renters. According to the 2016–2020 Comprehensive Housing Affordability Strategy (CHAS) data, 62% of households earning less than or equal to 30% of the Area Median Income (AMI) are renters, and the rate of homeownership increases steadily as income rises. Given the overlap between older housing stock, lower-income renters, and higher rates of potential lead-based paint exposure, it is estimated that a substantial portion of low- and moderate-income renter households in Lake County live in units at heightened risk of lead hazards.

**Discussion**

Lake County's rehabilitation needs are amplified by its aging housing stock. High-quality rehabilitation work is particularly critical for the 49% of renter-occupied units and 45% of owner-occupied units built before 1980, when lead-based paint was still widely used. Extremely low-income households are more likely to occupy rental housing, meaning the risk of lead exposure disproportionately affects families earning less than 30% of AMI. Rehabilitation efforts aimed at these older units are essential to mitigate health risks, maintain the long-term affordability of existing housing, and promote housing outcomes across the county.

## MA-25 Public And Assisted Housing - 91.410, 91.210(b)

### Introduction

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	766	4819	N/A	N/A	N/A	N/A	N/A
# of accessible units	0	0	N/A	102	102	N/A	N/A	N/A	N/A
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 31 – Total Number of Units by Program Type**

**Data Source:** U.S. Dept of Housing and Urban Development. Assisted Housing: National and Local. HUD User. Published December 2024.  
[https://www.huduser.gov/portal/datasets/assthsg.html#query\\_2009-2024](https://www.huduser.gov/portal/datasets/assthsg.html#query_2009-2024). Accessed May 15, 2025.

### Describe the supply of public housing developments:

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

Lake County Housing Authority owns and operates 467 units of public housing for seniors and individuals with disabilities and 119 single family homes, Waukegan Housing Authority maintains 278 public housing units, and North Chicago Housing Authority manages 150 public housing units.

## Public Housing Condition

Public Housing Development	Average Inspection Score
NORTH CHICAGO	44
ARMORY TERRACE HOMES	72
HARRY A. POE MANOR HOME	87
RAVINE TERRACE HOMES	88
BEACH HAVEN TOWER	74
MUNDELEIN SCATTERED SITES	59
ZION SCATTERED SITES	63

**Table 32 - Public Housing Condition**

**Data** U.S. Dept of Housing and Urban Development. Physical Inspection Scores. HUD User. Published March 2021.

**Source:** [https://www.huduser.gov/portal/datasets/assthsq.html#query\\_2009-2024](https://www.huduser.gov/portal/datasets/assthsq.html#query_2009-2024). Accessed May 15, 2025.

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

Due to the age of some of the public housing developments in Lake County, public housing authorities have been exploring redevelopment options. LCHA completed the redevelopment of Marion Jones public housing complex in late 2021 rebranding the development as the Brookstone and Regency at Coles Park projects, totaling 220 units. LCHA's Section 18 Demo/Disposition program has made significant progress with the disposition of approximately 42 of 161 scattered site public housing units. The units are sold to either families currently residing in the unit or to affordable housing providers effectively ensuring continued housing affordability. The sale of the scattered site provided for Tenant Protection Vouchers that are being used for eligible families. WHA has utilized the U.S. Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration program to rehabilitate and redevelop two public housing developments; The Bluffs at South Sheridan (120 units) and Crossings at McAree (50 units) and a third is in progress Riverside Apartments/Extension (98 units). The Harry Poe Manor development is expected to start the RAD conversion in late 2025. (155 units). North Chicago Housing Authority is actively seeking funding to make necessary repairs at the public housing developments.

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

Lake County Housing Authority is committed to serving the community and offers many opportunities in addition to rental assistance. In addition to operating a Family Self-Sufficiency Program, Lake County Housing Authority organizes enrichment opportunities such as summer camps and trips and hosts events such as family fitness nights, picnics, and luncheons. LCHA provides HUD certified housing counseling and fair housing training. Waukegan Housing Authority also organizes events such as a free farmers markets and annual block parties.



**Discussion:**

Public housing agencies are important partners in the preservation and development of quality affordable housing and Lake County welcomes and encourages collaboration between public housing agencies and other organizations that help Lake County residents in need.

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## MA-30 Homeless Facilities and Services - 91.410, 91.210(c)

### Introduction

The primary point of entry into Lake County's homeless response system is PADS Lake County, which operates an emergency shelter program using a motel-based model. This approach replaced the previous rotating shelter model in 2023 and now offers greater stability and consistency in service delivery. Shelter is provided across three motel sites located throughout the county. Clients typically receive a 90-day stay, with the option to extend based on engagement and progress toward permanent housing. This model allows for improved privacy and safety, particularly for families and individuals with complex needs.

All shelter and service providers participate in Coordinated Entry, a centralized system used to assess and prioritize individuals and families experiencing homelessness for available housing resources. Coordinated Entry is managed by the Lake County Coalition for the Homeless and staffed by Lake County Community Development. This system ensures that housing placements are made equitably and strategically, based on severity of need and vulnerability, in alignment with HUD requirements and best practices for serving households experiencing homelessness.

### Facilities Targeted to Homeless Persons

Table 33 - Facilities Targeted to Homeless Persons

Project Type	Emergency Shelter Beds		Transitional Housing Beds	Permanent Housing Beds		
Bed Type	Year-Round beds Current/new	Voucher/ Seasonal/ Overflow Beds	Current/ New	RRH Current/ New	PSH Current / New	OPH Current/ New
Households with adult(s) and Child(ren)	408	0	46	126	0	229
Households with only adults	168	0	37	29	0	132
Chronically Homeless Households	0	0	0	0	35	0
Veterans	0	4	0	8	25	0
Unaccompanied Youth	2	0	6	4	0	0
Child only HH(Under 18)	4	0	0	0	0	0

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

In Lake County, a variety of mainstream services support and enhance programs specifically targeted to individuals experiencing homelessness. The Lake County Health Department (LCHD) and Erie Health Systems operate Federally Qualified Health Centers (FQHCs), which are critical resources due to their mandate to serve all individuals, regardless of ability to pay. LCHD provides comprehensive medical, dental, and mental health services across seven sites countywide. Their Behavioral Health Service Area offers specialized treatment, support, and recovery programs for individuals facing severe mental illness and substance use disorders.

Erie HealthReach, located in Waukegan, offers a similar range of services on a smaller scale, ensuring access to care for underserved populations in that area. Additionally, organizations like the Art of Recovery and NICASA CORS play a significant role in addressing behavioral health and substance use challenges among people experiencing homelessness, often bridging the gap between street-level outreach and ongoing treatment.

Further strengthening this network of care, Rosalind Franklin University partners with local shelters to provide interim medical services for individuals with high health needs. These partnerships help stabilize clients and support continuity of care until they can be connected with a long-term primary care provider.

Together, these mainstream services work in tandem with targeted homeless assistance programs to create a more seamless and supportive system of care in Lake County.

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

Lake County has developed a comprehensive network of services and facilities to address the housing and supportive service needs of individuals and families experiencing homelessness, with particular attention to subpopulations such as chronically homeless individuals, families with children, veterans, survivors of domestic violence, and unaccompanied youth.

PADS Lake County functions as the primary point of entry into the local homeless response system. In 2020, PADS adopted a hybrid shelter model using both rotating sites and motel placements. By 2023, the organization transitioned fully to a motel-based shelter system, operating exclusively out of three

hotel locations across the county. The current model provides shelter for an initial 90-day period, with the possibility of extension based on client progress toward housing. Families are placed in private rooms, while single adults are typically housed with a roommate. This low-barrier approach supports rapid access to shelter and engagement in housing-focused case management. In late 2024, PADS purchased a motel property in Waukegan, which is currently under renovation to serve as a permanent emergency shelter for families. Once complete, the Waukegan Family Shelter will include 64 rooms and 224 beds across three floors. The first floor will include 21 rooms and five staff offices; the second floor will include 31 rooms and two staff offices; and the third floor will include 12 rooms and one staff office. Each floor will also feature at least one communal area to support client services and family interaction. This new facility will significantly expand the county's capacity to provide emergency shelter for families.

In addition to PADS, Lake County is served by several other shelter and transitional housing providers. Lake County Haven operates a transitional shelter for single women and women with children, offering individualized case management and wraparound support services. A Safe Place provides emergency shelter in a confidential location for survivors of domestic violence, accessible through a 24/7 crisis line, and delivers trauma-informed services alongside housing assistance. Most Blessed Trinity, operated by Catholic Charities, provides additional shelter capacity for survivors of domestic violence and their families.

Waukegan Township manages two transitional housing programs: the Eddie Washington Center, serving single adult men, and the Staben House, serving women and children. These facilities focus on long-term stabilization through structured case management, life skills development, and connections to permanent housing.

Veterans experiencing homelessness are served through the Captain James A. Lovell Federal Health Care Center, which offers a 62-bed domiciliary care program that combines transitional housing with access to medical, mental health, and substance use disorder services.

Emergency housing needs are further supported through a motel voucher program administered by Catholic Charities, providing temporary shelter to individuals and families who are unsheltered or awaiting placement in a more permanent shelter or housing program.

Youth experiencing homelessness, particularly those with high behavioral health needs, are served through the Allendale Association, a Lake County-based organization that provides residential treatment and behavioral health services for children and adolescents. Allendale operates residential treatment facilities in Lake Villa and North Chicago, accommodating up to 150 children and youth. These services are complemented by school programs designed for special education students ages 7–21, including programs for day students from local communities. Allendale's Shelter & Transitional Adolescent Resources (STAR) Program offers emergency shelter and housing for youth and young adults experiencing homelessness. The emergency shelter component serves eight boys, ages 14–17, in Lake Villa, with a maximum stay of 120 days. Additionally, the STAR program includes a transitional

living program based at the Becker Group Home in Waukegan, serving six young adults of any gender, ages 18–23, for up to two years. This program also offers two emergency beds for young adults in the same age range.

Lake County’s homeless response system prioritizes low-barrier access, individualized service planning, trauma-informed care, and interagency coordination to meet both the immediate and long-term needs of people experiencing homelessness.

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## MA-35 Special Needs Facilities and Services - 91.410, 91.210(d)

### Introduction

This section discusses special needs facilities and services in Lake County. **Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

- The elderly and frail elderly populations are growing in the County. Many of these individuals wish to remain in their homes for as long as possible, while challenges related to affordability, accessibility, and poor linkages to health services may make doing so difficult.<sup>1</sup> This group requires affordable housing options as their numbers grow, and their incomes remain stagnant or decrease. These households will require greater and greater levels of support from their families and from public sources as they age. These services include transportation, housing modifications and case/care management<sup>2</sup>.
- People with disabilities comprise a population that has also seen growth in Lake County over the past five years. The needs of this population mirror those of the elderly population in that they are specific to each person, varied and in greater demand. People with physical disabilities require homes that are modified to adapt to their specific disability. People managing mental and developmental conditions that impact housing require supports that are sometimes physical but often are service oriented such as transportation, nursing care and case/care management.
- Persons managing an alcohol or drug addiction require housing situations that reduce the likelihood of returning to their addictions. This is sometimes called “straight housing”. Sometimes these situations are communal environments that include other people dealing with addiction. The supports needed include counseling and affordability primarily in addition to an environment that has as few triggers to return to their substance of choice as possible.
- Regarding people with HIV/AIDS, “With safe, decent, and affordable housing, people with HIV are better able to access comprehensive health care and supportive services, get on HIV treatment, take their HIV medication consistently, and see their health care provider regularly.”<sup>3</sup>
- Public Housing residents face a lack of options as “Additional public housing has not been built in decades. Advocates are thus focused primarily on preserving the public housing stock that remains. Issues facing today’s public housing include: generally well-run public housing agencies facing significant federal funding shortfalls; policies like demolition, disposition and the HOPE VI program that have resulted in the nationwide loss of public housing units; and calls for deregulation of public housing, through the expansion of the Moving to Work demonstration

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<sup>1</sup> <https://www.huduser.gov/portal/periodicals/em/summer17/highlight1.html>

<sup>2</sup> <https://assets.aarp.org/rgcenter/ppi/liv-com/i38-strategies.pdf>

<sup>3</sup> <https://www.hiv.gov/hiv-basics/living-well-with-hiv/taking-care-of-yourself/housing-and-health>

program and other efforts, that come at the expense of affordability, deep income targeting, resident participation, and programmatic accountability.<sup>4</sup>

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

People returning from mental and physical health institutions are likely returning to the homes they lived in prior to their admission at one of these facilities. Often substance abuse recovery homes and/or Oxford Houses are used by people exiting facilities where they had substance abuse treatment. Lake County Health Department has several respite beds, recovery beds and long-term supportive units. Reportedly it is hard to find a bed, and people often seek beds in Cook County. According to IDPH (Illinois Department of Public Health) there are three (3) Specialized Mental Health Rehabilitation Facilities and 45 long-term care facilities in Lake County. These facilities have specific intake requirements including age, insurance and level of care.

Long-term supportive housing is limited in Lake County and focused on people meeting the HUD definition of homeless. There is substantial need for supportive housing for both homeless and non-homeless (literally), so a Pay for Success financing methodology is being explored, particularly with Justice sector partners who could see declines in jail population when sufficient supportive housing beds are created.

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

- Subsidize creation of permanent supportive housing for special needs populations, especially by developers who bring supportive services to promote self-sufficient residents.
- Address transit needs in low-income areas
- Support programs that create affordable housing
- Increase capacity of supportive housing services to be everywhere that special needs housing is needed in the County.

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

- Subsidize creation of permanent supportive housing for special needs populations, especially by developers who bring supportive services to promote self-sufficient residents.

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<sup>4</sup> <https://nlihc.org/explore-issues/housing-programs/public-housing>

- Address transit needs in low-income areas
- Support programs that create affordable housing
- Increase capacity of supportive housing services to be everywhere that special needs housing is needed in the County.

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## **MA-40 Barriers to Affordable Housing - 91.410, 91.210(e)**

### **Describe any negative effects of public policies on affordable housing and residential investment**

In Lake County several factors hinder the availability of affordable housing and residential investment. The factors include high land and construction costs, restrictive zoning and land use regulations, lack of financial support for affordable housing development, and resistance to incorporating affordable housing in high opportunity areas. Many municipalities within the County maintain zoning codes that limit or prohibit affordable housing development through single-family only zoning, large minimum lot sizes and height and density caps that prohibit or discourage multifamily and affordable housing developments. These restrictions may reduce the range of housing types available, particularly those that are more affordable, and concentrate low-income housing into specific areas, limiting socioeconomic growth. Large minimum lot requirements and low-density zoning increases the cost per unit of land acquisition and reduces financial feasibility of affordable development, especially in high-opportunity areas. Delays created by local development approvals such as plan reviews, public hearings, and lengthy approval timelines often hinder affordable housing projects which are time sensitive due to funding source requirement. The lack of zoning incentives, tax abatements and expedited permitting that support affordable housing is prohibitive when market-rate housing is more profitable for developers. Some municipalities impose impact fees and other cost prohibitive fees that disproportionately affect affordable housing developments. NIMBYism also prohibits affordable housing development as existing residents often oppose affordable housing development citing concerns such as crime, additional traffic, school overcrowding and lower property values. Due to zoning, fee structures and slow permitting timelines, developers face lower profit margins and longer development horizons. Without offsetting incentives, the return on investment is often too low to attract and retain affordable housing developers. While these policies are not intentionally exclusionary, their cumulative impact contributes to a constrained housing market and further discourages investment in affordable housing. To overcome these barriers zoning reform, incentives, improved approval process, community education and a stronger coordination among local authorities to ensure affordable housing development is prioritized and align land use policies with affordable housing goals.

## MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

### Introduction

This section provides insight into the economic development landscape within Lake County. The table just below details the extent of business sector employment throughout the County. Unemployment, commuting times, and education are then considered.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	440	520	0	0	0
Arts, Entertainment, Accommodations	27,881	28,125	11	10	0
Construction	10,708	12,846	4	5	1
Education and Health Care Services	38,592	35,763	15	13	-2
Finance, Insurance, and Real Estate	19,151	18,987	7	7	0
Information	4,462	3,163	2	1	-1
Manufacturing	36,673	51,273	14	19	5
Other Services	9,576	8,931	4	3	0
Professional, Scientific, Management Services	34,275	30,663	13	11	-2
Public Administration	0	0	0	0	0
Retail Trade	31,695	36,245	12	13	1
Transportation and Warehousing	9,312	6,411	4	2	-1
Wholesale Trade	19,304	21,011	7	8	0
Total	242,069	253,938	--	--	--

**Table 34 - Business Activity**

**Data Source:** 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	324,849
Civilian Employed Population 16 years and over	308,419
Unemployment Rate	5.07
Unemployment Rate for Ages 16-24	14.61
Unemployment Rate for Ages 25-65	3.27

**Table 35 - Labor Force**

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People Median Income
Management, business and financial	105,170
Farming, fisheries and forestry occupations	9,217
Service	24,054
Sales and office	70,524
Construction, extraction, maintenance and repair	16,783
Production, transportation and material moving	16,124

**Table 36 – Occupations by Sector**

Data Source: 2016-2020 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	146,075	52%
30-59 Minutes	98,144	35%
60 or More Minutes	35,364	13%
<b>Total</b>	<b>279,583</b>	<b>100%</b>

**Table 37 - Travel Time**

Data Source: 2016-2020 ACS

## Education:

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

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	24,227	1,919	6,942
High school graduate (includes equivalency)	46,418	3,322	16,242
Some college or Associate's degree	61,108	3,736	12,706
Bachelor's degree or higher	152,695	3,267	21,241

**Table 38 - Educational Attainment by Employment Status**

Data Source: 2023: ACS 1-Year Estimates

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	1,010	1,381	3,198	5,660	1,443
9th to 12th grade, no diploma	3,816	2,066	3,349	3,725	2,404
High school graduate, GED, or alternative	15,873	9,193	89,590	18,385	11,304
Some college, no degree	11,549	10,218	7,914	14,785	9,525
Associate's degree	1,274	2,416	1,556	4,854	2,843
Bachelor's degree	5,552	12,312	12,208	22,888	13,802
Graduate or professional degree	125	3,777	9,705	22,905	12,427

**Table 39 - Educational Attainment by Age**

Data Source: 2023: ACS 1-Year Estimates

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

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	36,089
High school graduate (includes equivalency)	41,239
Some college or Associate's degree	50,293
Bachelor's degree	79,775
Graduate or professional degree	103,332

**Table 40 – Median Earnings in the Past 12 Months**

Data Source: 2023: ACS 1-Year Estimates

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

According to EMSI, manufacturing provides the highest percentage of all jobs (19%). As can be seen in the table above, Education and Health Care (13%), Retail Trade (13%) and Professional, Scientific, Management Services (11%) provide a high percentage of jobs in the County.

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

The Lake County Workforce Plan for 2020-2024 aligns with Governor Pritzker's Executive Order 2019-03 to unite workforce development partners around regional cluster strategies, prepare Illinois workers for a career, not just their next job and connect job seekers with employers.

The College of Lake County and Workforce Development will work the regional apprenticeship navigators and intermediaries, along with interested partners to expand apprenticeships in Lake County and regionally. Additionally, Workforce development, economic development and education will collaborate with high schools to expose more students to careers with Lake County employers, careers in the STEM field, and internship opportunities through innovative programming and employer connections.

Lake County is part of the Northeastern Economic Development Region 4 which has chosen to focus efforts on the following industries, with the understanding that information technology (IT) underlies all of these and is an important economic driver in its own right:

- Healthcare and Social Assistance (and Life Sciences)
- Manufacturing (with an emphasis on Advanced Manufacturing)
- Transportation and Warehousing

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

Lake County Workforce Development, Lake County Partners and College of Lake County launched the Lake County Workforce Ecosystem. The Ecosystem drives talent development through an industry sector strategy. According the Lake County Partners, nearly 46% of Lake County residents have a Bachelor's Degree or higher, which is 13% more than the national average. This creates a highly educated employment pool. Work with area high schools and the College of Lake County brings awareness and opportunities to trades and various certificate programs.

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

In general Lake County has a highly educated workforce population, with 42 percent of adults holding a bachelor's degree or higher, compared to 37 percent across the state and 35 percent nationally. The Northeast Economic Development Region (NEEDR)'s 2024-2028 report identifies that 20% of residents in the region do not have their High School Diploma and this population is the hardest hit by the poverty level.

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

Lake County Workforce has partnered with the local economic development group, Lake County Partners (LCP), to provide Business Service Outreach. LCP is responsible for serving as the official greeter to local employers and providing referrals back to Lake County Workforce as appropriate from interactions/conversations. These services will continue to expand to include additional partners and stakeholders including the local community college, College of Lake County.

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

Yes

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

Lake County does not have a current, County specific, Comprehensive Economic Development Strategy (CEDS). Regionally, the Chicago Metropolitan Agency for Planning (CMAP) "On to 2050" encompasses Lake County.

The CMAP comprehensive regional plan "On to 2050" identifies "Inclusive Growth" as a clear, overarching principle. "Regions that offer economic opportunity for residents regardless of race, income, or background enjoy longer, stronger periods of prosperity and fewer, shorter periods of economic stagnation" (CMAP). Lake County understands that despite a relatively good economic position, Lake County is falling short of creating equal economic opportunity for all residents. The data indicates that economic success is limited by factors of race or ethnicity; most clearly for black and

Hispanic resident. To provide for equal economic opportunity, Lake County needs to remove barriers to residents' economic prospects, health, and overall quality of life. Disrupting these patterns is essential to achieve "inclusive growth".

## **Discussion**

The elderly and disabled populations in Lake County are increasing at a significant rate. Low-income households and those living under the poverty level will continue to require assistance from the nonprofit and government sectors. With strategically delivered resources, the County can maximize the impact of their dollars to benefit these most in-need groups.

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

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

CPD Maps *Housing Cost Burden HAMFI* map shows there is one census tract in North Chicago where greater than 58.44% of residents are cost burdened, spending more than 30% of their household income on housing costs. There are several census tracts where 47.69-58.44% of residents are cost burdened, which are generally clustered around the areas of Waukegan, North Chicago, Round Lake, Highwood, Fox Lake and Zion. While CPD Map layers allow the user to filter Lake County census tracts by the percentage of extremely low-income, low-income, or moderate-income households that have any of four severe housing problems or one of either substandard housing, overcrowding, or severe cost burden, none of the CPD Maps layers allow the user to filter by concentrations of multiple housing problems. Though it is not possible to determine if there are areas where households with multiple housing problems are concentrated, it appears that there are census tracts all over the county with high percentages of severe housing problems among extremely low-income, low-income, and moderate-income households.

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

According to CPD Maps, there are several areas of Lake County where racial or ethnic minorities are concentrated, especially for Black or African American residents or persons of Hispanic Origin. The *Black or African American Alone* CPD Map shows that there are eleven census tracts with 27.82-53.08% Black or African American residents. These eleven census tracts with high concentrations of Black or African American residents are all located in the northeast area of the county, in census tracts in and around North Chicago, Park City, Waukegan, Zion, and Beach Park. Similarly, the *Persons of Hispanic Origin* CPD Map shows there are five census tracts with greater than 71.50% Hispanic residents and 18 census tracts with 47.80%-71.50% Hispanic residents. The majority of these communities are located in the northeast area of county as well, in census tracts in and around Waukegan, Park City, and North Chicago. Additionally, the *Asian Alone* CPD Map there are five census tracks with 31.82% - 51.59% Asian residents. These census tracks are primarily located in the southern portion of the county, in and around Buffalo Grove, Lincolnshire and Venon Hills. According to CPD Maps, there are no areas with high concentrations of residents who identify as American Indian/Alaskan Native alone, or Native Hawaiian/Pacific Islander alone.

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



The census tracts with high concentrations of Black or African American or Hispanic residents are mostly in and around cities such as North Chicago, Park City, Waukegan, Zion, and Beach Park. These areas are also present on several other CPD Maps layers that explore market characteristics.

- According to the *Median Home Value* CPD Map, all of these census tracts have the lowest Median Home Values in Lake County, at \$0-\$181,300.01.
- The *Owner Units to 100 Percent HAMFI* CPD Map shows the percentage of homeowner units in a community that are affordable to a household with 100% of the Area Median Income. Low- and moderate-income households will be most likely to afford homes in these communities. The census tracts with greater than 58.29% of owner units affordable to moderate income households also tend to correspond to these areas.

Lastly, the *Percent Renter Occupied Housing* CPD Map shows that these areas also have higher percentages of renter-occupied housing. While the majority of Lake County census tracts have less than 55.86% housing occupied by renters, a small number of census tracts have 55.86-75.72% or greater than 75.72% renter-occupied housing. Many of these census tracts correspond to the tracts with high concentrations of Black or African American or Hispanic Residents.

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

Lake Michigan is a significant asset in both Waukegan and North Chicago, along with the Union Pacific North line of the Metra Commuter Rail. Both the College of Lake County and Lake County government have significant facilities in Waukegan, while both the Abbvie Corporation and the U.S. Navy have facilities in North Chicago.

Despite such resources, CMAP's regional plan observes, "All seven counties have some communities that, while rich in assets, have seen long-term disinvestment. These areas require focused and catalytic investment as well as assistance that will build their ability to improve their resident's quality of life."

Strategically, in its regional analysis CMAP makes a distinction between:

1. Economically disconnected areas- greater Round Lake area, Park City
2. Disinvested areas – Zion, North Chicago, part of Round Lake area

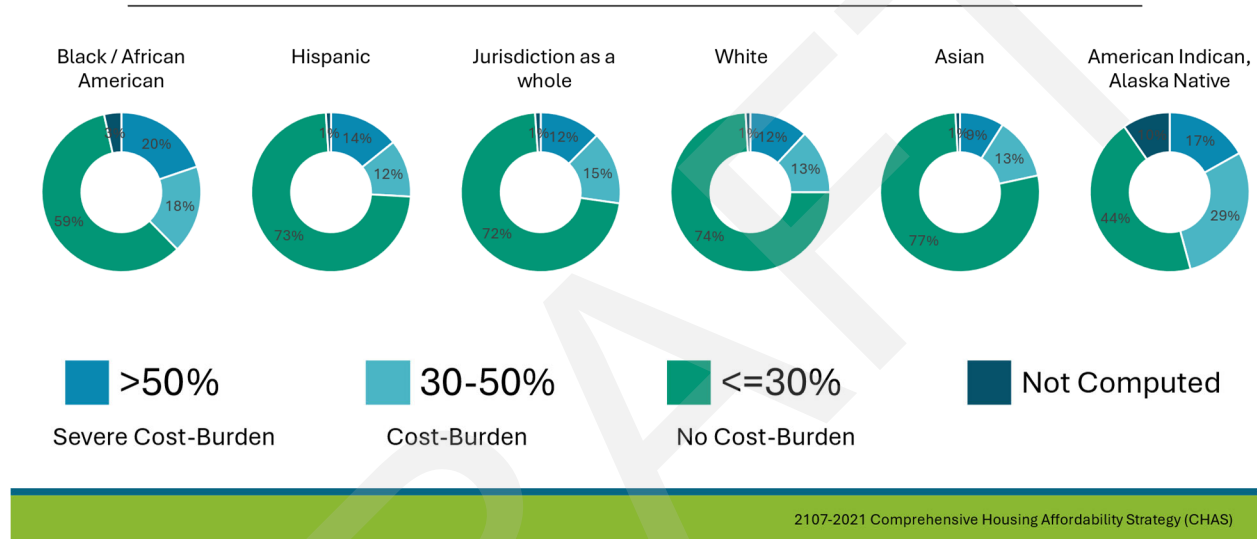
Both – Waukegan, parts of North Chicago, Round Lake area and Zion

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

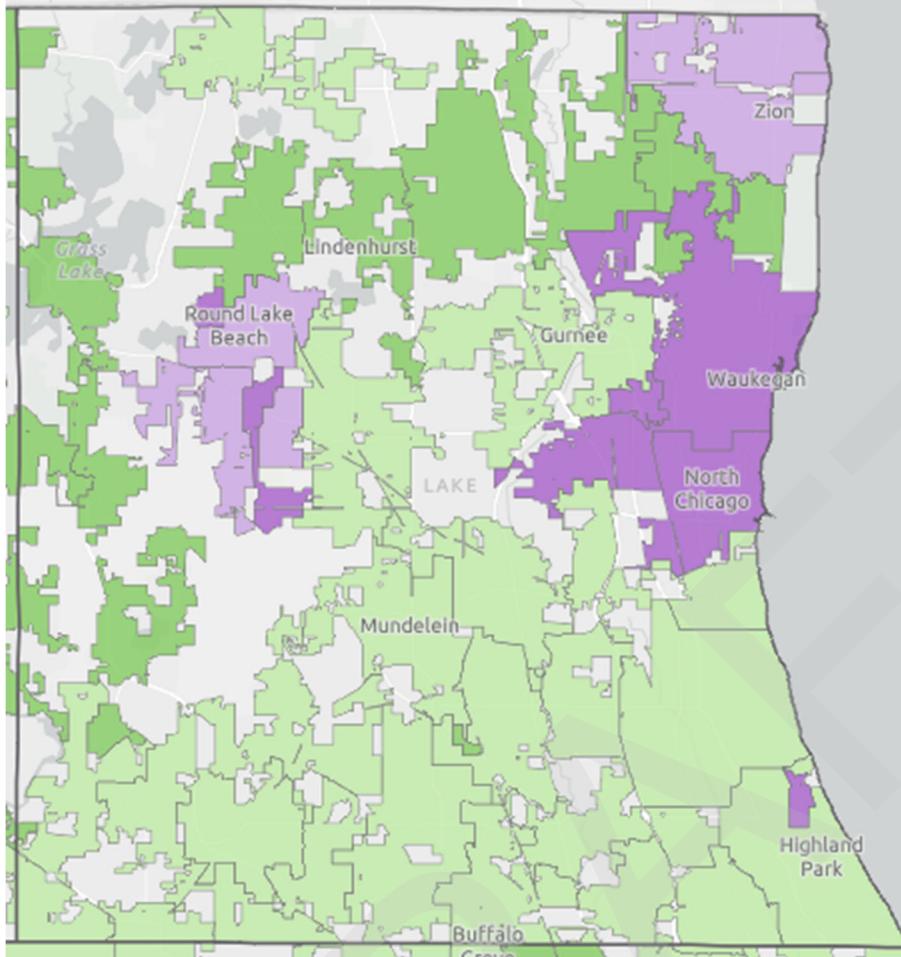
A total of five census tracts in Lake County have been designated as federal opportunity zones according to IRS regulations in the 26 USC Subtitle A, CHAPTER 1, Subchapter Z: Opportunity Zones. The census tracts cover portions of Waukegan, North Chicago, Zion and Park City. The recent opportunity zone

legislation provides incentive to private investors to invest in capital starved areas. Opportunity zones make for attractive targets for investment for the holders of unrealized capital gains. Investments in these areas stand to significantly help the community, since estimates of the unrealized gains held by investors is in the trillions of dollars.

## Percentage of Lake County Residents experiencing Cost-Burden and Severe Cost-Burden, By Race



**Some Minorities in Lake County have Greater Housing Cost Burden**



**Lake County Economically Disinvested Areas (EDA) Souce: CMAP**

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

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

Low-income households in Lake County continue to experience lower levels of internet access and fewer devices to connect to the internet, as reflected in the 2023 American Community Survey (ACS) 5-Year Estimates (Table S2801). In Lake County overall, approximately 28,386 households do not have access to a computing device, and 60,681 households lack an internet subscription. In North Chicago and Waukegan—municipalities with higher concentrations of low- and moderate-income (LMI) households—approximately 993 and 3,168 households, respectively, lack internet subscriptions.

Broadband access disparities are particularly notable among lower-income households. Among households earning less than \$20,000 annually:

- In Lake County, 16,414 households lack a broadband internet subscription.
- In North Chicago, 484 households lack broadband.
- In Waukegan, 829 households lack broadband.

Although overall broadband adoption is high across Lake County, these numbers demonstrate a persistent digital divide, particularly affecting LMI households and neighborhoods. Access to reliable and affordable broadband and computing devices remains essential for employment, education, telehealth, and civic participation.

### **Describe the need for increased competition by having more than one broadband Internet**

Increased competition is needed for broadband services in Lake County to lower costs and expand service access, particularly for low- and moderate-income households. The broadband market in Lake County functions largely as an oligopoly, with few providers offering similar internet services and little pressure to lower prices or improve service quality. This lack of competition keeps costs elevated, creating affordability barriers for residents with limited incomes.

Greater broadband competition would improve affordability, expand service options, and enhance network reliability, particularly in historically underserved areas like North Chicago and Waukegan, where household internet access lags behind the countywide average. Expanded affordable broadband infrastructure will be crucial to closing the digital divide and promoting access to economic and educational opportunities.

<b>Device, Broadband and Internet Access for Lake County, City of North Chicago and City of Waukegan 2023 ACS 5-Year Estimates: Table S2801</b>			
Geography	Lake County	North Chicago	Waukegan
Has one or more types of computing devices	665,435	6,852	30,881
Has one or more types of computing devices: Desktop or laptop	580,458	5,202	21,005
Has one or more types of computing devices: Smartphone	629,879	6,519	29,716
Percent; No Computer	28,386	448	903
With an internet subscription	633,140	6,307	28,616
With an internet subscription: Broadband of any type	631,601	6,307	28,616
With an internet subscription: Broadband of any type – Cellular data plan	584,635	5,870	27,425
With an internet subscription: Broadband of any type – Broadband such as cable, fiber optic or DSL	499,048	5,130	22,710
Broadband satellite	75,056	454	1,562
Without internet subscription	60,681	993	3,168
Less than \$20,000: With a broadband Internet subscription	49,519	974	2,778

Less than \$20,000: Without a broadband Internet subscription	16,414	484	829
\$20,000 to \$74,999; With a broadband Internet subscription	249,709	2,797	11,204
\$20,000 to &74,999; without Internet subscription	31,877	322	1404
\$75,000 or more; With a broadband subscription	332,373	2,536	14,634
\$75,000 or more; Without a broadband subscription	12,390	187	935

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

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

Flooding remains the most prevalent and severe natural hazard facing Lake County residents. The county's physical geography, coupled with extensive urban development and relatively flat topography, increases its vulnerability to flood events. Climate change has intensified these risks by contributing to more frequent and intense rainfall events. Flooding impacts critical infrastructure, disrupting road and rail transportation, causing utility outages, overwhelming sewer systems, and leading to significant personal and financial stresses for residents.

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

Low- and moderate-income (LMI) households are disproportionately vulnerable to the impacts of climate-related flooding events. Communities with high concentrations of LMI residents often face significant barriers to upgrading aging infrastructure and implementing climate resilience measures. Limited financial resources restrict their ability to prepare for, withstand, and recover from flood events.

The Chicago Metropolitan Agency for Planning (CMAP) recognized in its *On to 2050* Comprehensive Plan that economically disconnected populations—including many LMI households—lack adequate access to critical resources needed for climate resilience. Flood events exacerbate existing disparities, leading to faster deterioration of housing, streets, sidewalks, and public utilities in LMI areas, which can make these neighborhoods less desirable and further entrench poverty.

To protect vulnerable populations, it is critical that Lake County and its municipalities prioritize investments in sustainable infrastructure, green building practices, and the enhancement of natural resources to mitigate future flood risks. Preparing LMI areas for the effects of climate change will help safeguard housing stability, improve public health, and strengthen community resilience.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The County, through partnerships with local municipalities, townships, and nonprofit agencies, developed the framework for allocating funds to meet the needs facing Lake County residents for the next five years. The strategic plan describes how funding will be distributed through different activities. Included in this section are details of each element of the Strategic Plan.



## SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

### Geographic Area

1	<b>Area Name:</b>	Fox Lake Area
	<b>Area Type:</b>	Local Target area
	<b>% of Low/ Mod:</b>	65% LMI
	<b>Revital Type:</b>	Comprehensive
	<b>Identify the neighborhood boundaries for this target area.</b>	The two low/moderate income census tracts in the Fox Lake area are located in the downtown area and the lake area just north of downtown.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Approximately 65% of households in these two census tracts meet the low/moderate income threshold. Due to its founding as a lakeside resort community, many of the existing homes were initially constructed as summer homes and have since been converted to permanent residences. Such residences suffer from lack of appropriate infrastructure and quality building materials that withstand the tests of time - making for naturally occurring affordable housing.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Data, consultation & citizen participation.
	<b>Identify the needs in this target area.</b>	Fox Lake has identified needs to enhance of the downtown area with commercial uses and improved recreation amenities at the lake. A local planning study noted that appearance of commercial buildings require updating.
	<b>What are the opportunities for improvement in this target area?</b>	Fox Lake is the terminus of the Milwaukee District North line of Metra commuter rail, so connection to jobs elsewhere in Lake County and downtown present opportunities for income growth. Beautifying the lakeside areas would also attract more investment to the community.

	<b>Are there barriers to improvement in this target area?</b>	Barriers in the Fox Lake area include lack of capital and vacant commercial properties with perceived value greater than actual market value, so remain abandoned.
2	<b>Area Name:</b>	High Outcome Areas
	<b>Area Type:</b>	Local Target area
	<b>% of Low/ Mod:</b>	n/a
	<b>Revital Type:</b>	Comprehensive
	<b>Identify the neighborhood boundaries for this target area.</b>	The High Outcome Areas in Lake County are illustrated in the High Outcomes Map located below (in this section).
	<b>Include specific housing and commercial characteristics of this target area.</b>	A variety of neighborhoods qualify as High Outcome Areas; therefore, there are no specific housing and commercial characteristics that are common across all High Outcome Areas. High Outcome Areas consist of census tracts where the expected household income for persons growing up there is greater than 80% AMI, with low incarceration rates, per the Opportunity Atlas ( <a href="https://www.opportunityatlas.org/">https://www.opportunityatlas.org/</a> ) based on U.S. Census data.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	<p>Initially, Lake County's 2014 Analysis of Impediments to Fair Housing Choice (AI) found that much of the local affordable housing stock was concentrated in areas of high poverty and in communities with significant racial and ethnic minority populations. The 2014 AI emphasized the need for Lake County to prioritize affordable housing investments in "opportunity areas" — locations with access to strong schools, employment centers, and other resources that support economic mobility.</p> <p>When Lake County updated the AI in 2020, it incorporated new data tools such as the Opportunity Atlas (<a href="http://www.opportunityatlas.org">www.opportunityatlas.org</a>), which maps economic and social outcomes, including income levels and incarceration rates, based on where individuals grew up. The Opportunity Atlas data showed that while most of Lake County offers high-opportunity environments, certain areas — including Fox Lake, Highwood, Mundelein, North Chicago, Round Lake, Waukegan, and Zion — exhibited lower outcomes related to income and higher incarceration rates. This analysis reaffirmed Lake County's commitment to strategically support the development and</p>

		<p>preservation of affordable housing in high-opportunity areas outside of these historically lower-outcome communities whenever possible.</p> <p>Both the 2014 AI and the 2020 AI Update were developed with strong community input and were broadly supported through the citizen participation process, which during the 2019–2020 update cycle included four public hearings and opportunities for public comment.</p>
	<b>Identify the needs in this target area.</b>	High outcome areas in Lake County tend to lack affordable housing.
	<b>What are the opportunities for improvement in this target area?</b>	High outcomes areas in Lake County can benefit from offering more housing choice, such as affordable rental units, especially larger rental units.
	<b>Are there barriers to improvement in this target area?</b>	Local land use policy and lack of available sites impede affordable housing development in high outcome areas. Please see section SP-55 Strategic Plan Barriers to Affordable Housing.
3	<b>Area Name:</b>	Highwood Area
	<b>Area Type:</b>	Local Target area
	<b>% of Low/ Mod:</b>	71%
	<b>Revital Type:</b>	Comprehensive
	<b>Identify the neighborhood boundaries for this target area.</b>	Highwood contains two census tracts block groups that have 1,730 residents living at or below 80% of area median income (09786540001 and 09786520002). The entire community, however, has 48.6% of its population living at or below 80% of area median income.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Highwood's housing stock accommodates a wide variety of residents ranging from first-time homebuyers to CEOs.
	<b>How did your consultation and citizen participation process help you to</b>	CDBG Low/Moderate Income Census maps.

	<b>identify this neighborhood as a target area?</b>	
	<b>Identify the needs in this target area.</b>	With only a few lots available for development, improving existing housing is vital to Highwood's future. Park land is also too limited in supply.
	<b>What are the opportunities for improvement in this target area?</b>	Highwood has a unique character and great restaurants that draw clientele from throughout Lake County and northern Cook County. Capitalizing on its downtown is an ongoing opportunity, of which Highwood takes full advantage by planning many festivals to attract community members to its restaurants and small businesses. Highwood's 2013 Comprehensive Plan provides a blueprint to encourage more dense multi-family and mixed-use development in its downtown and immediately adjacent areas.
	<b>Are there barriers to improvement in this target area?</b>	Lack of available land.
4	<b>Area Name:</b>	North Chicago Area
	<b>Area Type:</b>	Local Target area
	<b>% of Low/ Mod:</b>	72%
	<b>Revital Type:</b>	Comprehensive
	<b>Identify the neighborhood boundaries for this target area.</b>	Census tracts; 17097862300, 17097862502, 17097862901, 17097862902, 17097863003, 17097863004, 170978 63100 and 17097863201.
	<b>Include specific housing and commercial characteristics of this target area.</b>	<p><u>Housing</u> - There is a large percentage of older renter-occupied homes on narrow lots in the north and east side of the City as compared to other areas of the City/County. Compared to other areas of the County, North Chicago has a low-cost housing stock. However, housing affordability remains an issue for residents. This area has slightly higher rates of vacant and distressed properties.</p> <p><u>Commercial</u> - North Chicago is home to major institutions (Abbvie, Abbott, Rosalind Franklin, Lovell, Great Lakes Naval Academy). These institutions attract numerous commuters on a daily basis and commercial opportunities exist to capitalize on these high</p>

		traffic corridors. The City has strong manufacturing base particularly due to Abbvie and Abbott.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Data, consultation & citizen participation.
	<b>Identify the needs in this target area.</b>	Improved housing condition, job creation, grocery store and infrastructure.
	<b>What are the opportunities for improvement in this target area?</b>	<p>The City is home to several major employers that attract a large number of commuters on a daily basis. There is an opportunity to capitalize on the commercial potential of the high traffic corridors in the City. The City also owns a large desirable property near the main entrance to the Great Lakes Naval Academy which has high redevelopment potential.</p> <p>The North Chicago Metra Station has the potential to serve as a major transit hub due to the proximity to downtown, Abbvie and Abbott Labs, and Great Lakes Training Center, and its service by Metra, Pace bus, and various shuttle services. T</p> <p>The City has a tremendous asset with public access to Lake Michigan. However, accessing the Lakefront is difficult via Foss Park Avenue and the space is constrained by the locations of several major institutions.</p>
	<b>Are there barriers to improvement in this target area?</b>	<p>North Chicago struggles with unemployment rates and educational attainment as compared to other areas of the County.</p> <p>North Chicago Community Unit School District (CUSD) 187 serves almost all of the City of North Chicago, including residents of Great Lakes Naval Academy.</p> <p>Five major institutions (Great Lakes Naval Academy, Abbott, Abbvie, Rosalind Franklin and Lovell Federal Health Care) have significant influence on the character and direction of the City. Approximately 34% of the land within the City limits is controlled by federal institutions.</p>
5	<b>Area Name:</b>	Mundelein Area

	<b>Area Type:</b>	Local Target area
	<b>% of Low/ Mod:</b>	60%
	<b>Revital Type:</b>	Comprehensive
	<b>Identify the neighborhood boundaries for this target area.</b>	Mundelein is centrally located in Lake. The remaining areas of low/moderate income concentration are census tracts; 17097864002, 17097864001, 17097864510 and 17097864511.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Approximately 60% of households in these census tracts are below area median income.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Data, consultation & citizen participation.
	<b>Identify the needs in this target area.</b>	Preserve existing affordable housing & continue revitalizing commercial areas.
	<b>What are the opportunities for improvement in this target area?</b>	Residents need better access to living wage jobs. Some housing is in dire need of rehabilitation and preservation. The Village of Mundelein has expressed interested in collaborating on affordable housing development for seniors.
	<b>Are there barriers to improvement in this target area?</b>	The Village of Mundelein has recently completed a multi-family affordable rental housing building to be developed in their downtown district. It may be difficult to site an additional affordable multifamily project in downtown area.
6	<b>Area Name:</b>	Round Lakes Area
	<b>Area Type:</b>	Local Target area
	<b>% of Low/ Mod:</b>	64%
	<b>Revital Type:</b>	Comprehensive
	<b>Identify the neighborhood boundaries for this target area.</b>	This area contains unincorporated areas plus Hainesville, Round Lake itself, Round Lake Beach, Round Lake Heights, and Round

		Lake Park. Please see the ACS Median Income for Lake County below for more detail.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Approximately 64% of households are below area median income.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Data, consultation & citizen participation.
	<b>Identify the needs in this target area.</b>	Preserve existing affordable housing & commercial revitalization. The high poverty level exists despite local amenities, indicating need for greater job readiness and connectivity to jobs.
	<b>What are the opportunities for improvement in this target area?</b>	The Round Lake communities need focused investment to reduce residents' poverty level. Opportunities exist to leverage the area's several Metra stations and Round Lake Civic Center. Rollins Crossing is a major commercial area experiencing many vacancies which could offer the opportunity to locate a combination of housing, commercial and recreational uses.
	<b>Are there barriers to improvement in this target area?</b>	The close proximity of several units of government in this area necessitates extensive intergovernmental communication and collaboration.
7	<b>Area Name:</b>	Waukegan Area
	<b>Area Type:</b>	Local Target area
	<b>% of Low/ Mod:</b>	70%
	<b>Revital Type:</b>	Comprehensive
	<b>Identify the neighborhood boundaries for this target area.</b>	Census tracts; 17097861504, 17097861506, 17097861509, 17097861702, 17097861803, 170978 61804, 17097861901, 17097861902, 17097862000, 17097862100, 17097862200, 17097862300, 17097862401, 17097862402, 17097862501, 17097862502, 170978 62603, 17097862604, 17097862605, 17097862700, 17097862800 and 17097866100.

	<b>Include specific housing and commercial characteristics of this target area.</b>	<p><u>Housing</u> - This area has a near equal share of homeownership and rental housing. The vacancy rates of this area are slightly higher, and housing values are lower than the remainder of the County.</p> <p><u>Commercial</u> – The City of Waukegan has suffered punctuated employment loss. Historically, large scale manufacturing companies provided the majority of jobs for Waukegan residents. With improvements in technology these largely blue-collar jobs are no longer available.</p>
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Data, consultation & citizen participation.
	<b>Identify the needs in this target area.</b>	<p>Housing affordability is an issue, especially in areas with older homes which drive up rehabilitation costs. The City needs housing accommodations that attract future residents, specifically young families.</p> <p>Median household income is less the City as compared to other areas of the County. The City is continuing efforts to address this issue and enhance the educational attainment of residents.</p>
	<b>What are the opportunities for improvement in this target area?</b>	There is an opportunity for infill development in the downtown area. The proximity to large scale companies, such as United Conveyor, VisualPak, Peer Bearing, AbbVie Pharmaceuticals, and Abbott Laboratories present an opportunity for commercial success.
	<b>Are there barriers to improvement in this target area?</b>	<p>Waukegan has historically been a manufacturing and shipping center. As manufacturing has slowed, many manufacturers have left. Abandoned sites present a number of environmental concerns.</p> <p>Access to the lakefront is difficult. There is a steep topographic grade between the downtown area and the lakefront. The Amstutz Expressway and rail lines present a physical barrier between the lakefront and downtown.</p>
	<b>8</b>	
	<b>Area Name:</b>	Zion Area
	<b>Area Type:</b>	Local Target area



<b>% of Low/ Mod:</b>	73%
<b>Revital Type:</b>	Comprehensive
<b>Identify the neighborhood boundaries for this target area.</b>	Census tracts; 17097860200, 17097860301, 17097860302, 17097860400, 17097860500 and 17097860600.
<b>Include specific housing and commercial characteristics of this target area.</b>	<p><u>Housing</u> - Housing in this area has a homeownership percentage less than the other areas of the County. The homes primarily consist of single- family homes. There is a larger percentage of federally subsidized homes in Zion as compared to other areas of the County. The median home values in this area are less than other areas of the County, which may be explained by a high number of small lots and homes for starter families.</p> <p><u>Commercial</u> - The lack of economic opportunity within the City of Zion has led to the vast majority of residents working outside city limits. The City is highly dependent on the City of Hope Cancer Treatment Center which is both the City's largest employer but also drives the demand for lodging and weekday commercial activity.</p>
<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Data, consultation and citizen participation.
<b>Identify the needs in this target area.</b>	<p>The City lacks direct access to an urgent care facility. While there are national grocery chain stores present within the city limits, census tract 17097860301 is considered by the USDA as a food desert. There is a need for a healthy food option for the residents in the central area of the City.</p> <p>Overall housing needs in Zion include an increase in demand for all types of quality housing, with the greatest demand for more multifamily housing options and small-lot single-family homes.</p>
<b>What are the opportunities for improvement in this target area?</b>	Opportunities for improvement exist with the untapped potential of the lakefront. Expanding the lakefront park and increasing transit linkage to the Metra station and lakefront would increase a potential customer base for local businesses. Illinois Beach State Park (IBSP) draws over one million visitors to Zion, however the

		entryway is poorly located. Relocating the entryway to IBSP so that the downtown area would benefit from the visitors would be a significant improvement. The relocation would also benefit the Metra Station by providing better access to the lakefront for visitors coming from the south.
	<b>Are there barriers to improvement in this target area?</b>	Land use in the adjacent areas to the City tends to isolate the City. With the lake to the east, rural development to the north and floodplains and forest preserve to the west, the potential regional customer market for the City is limited. In addition, the major north-south transportation corridors (Route 41 and Interstate 294) are located more than 5 miles to the west.

## General Allocation Priorities

Describe the basis for allocating investments geographically within the state

Geographic prioritization of federal investment will continue to adopt the two-pronged approach established for Community Development Block Grant (CDBG) and HOME Investment Partnership funds in the previous Consolidated Plan:

1. **Assist in expanding the supply of housing in High Outcome Areas.** In an effort to support inclusive growth, Lake County recognizes the U.S. Census Opportunity Atlas definition of a "High Outcome Area" as an area where expected household income for people who grew up there is higher than 80% AMI. Prioritizing investment in these areas, especially in the creation of new affordable housing units, will promote economic mobility for all Lake County residents.
2. **Revitalize areas of greatest need.** In addition to the entitlement communities of North Chicago and Waukegan, several areas of Lake County are home to a concentrated number of low/moderate income households whose neighborhoods would benefit from community reinvestment. Indicated in HUD data as census tracts where over 55% of households are at or below area median income (AMI) these target areas are identified in green in the map below. In further articulating each area's specific needs/barriers, place-based strategies and opportunities, Lake County will continue work with the respective local governments for these areas.

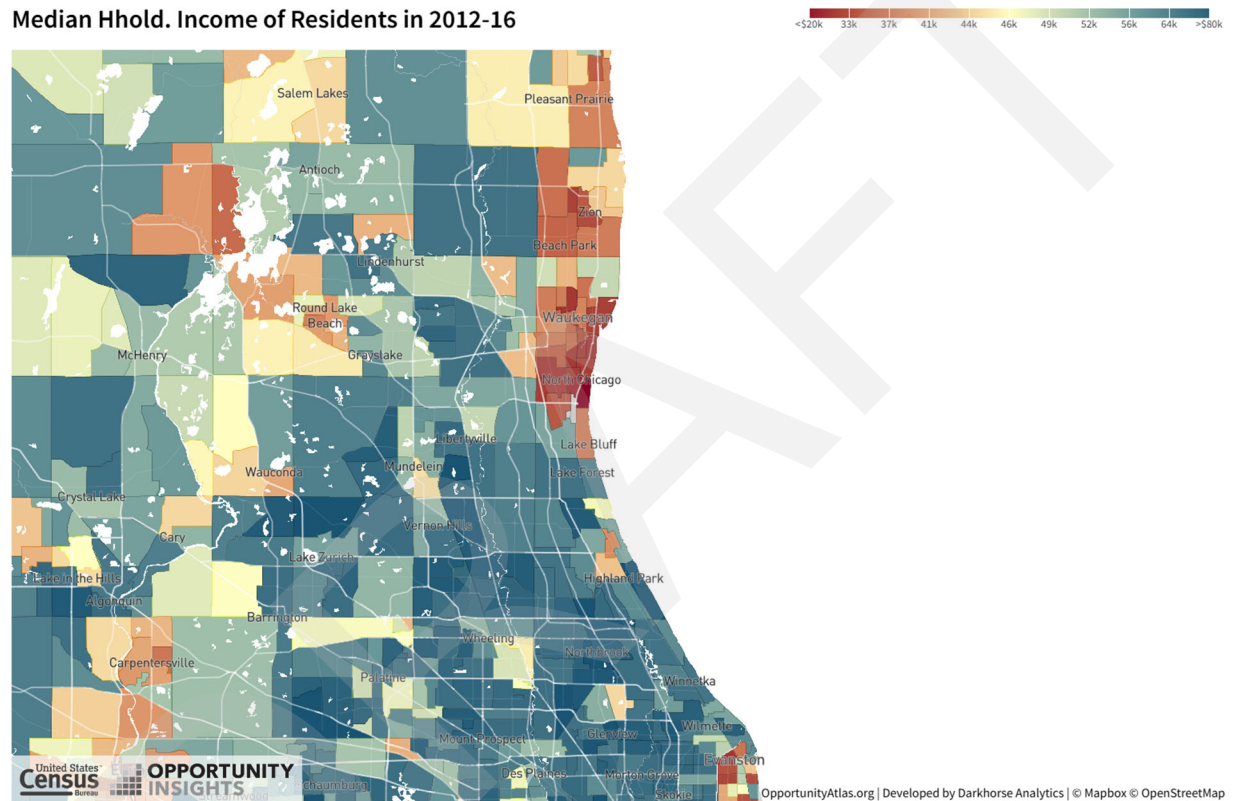
All of Lake County's areas of greatest need, other than Fox Lake, are also identified as Economically Disconnected Areas (EDAs) "characterized by low-income minority and limited English proficiency communities as well as weak demand for nonresidential land uses ([www.cmap.illinois.gov/2050/maps/eda](http://www.cmap.illinois.gov/2050/maps/eda)). For these communities, CMAP recommends:

- Rebuilding communities, increasing local revenues and enhancing local government capacity and expertise

- Broadening opportunities for innovation and promoting pathways for upward economic mobility
- Growing the ability of vulnerable populations to respond to environmental challenges and improving environmental conditions and access to nature for those populations
- Promoting tax policy reforms and technical assistance to communities
- Improving mobility options that spur economic opportunity for low-income communities, people of color, and people with disabilities

Source: CMAP ON TO 2050 Plan ([www.cmap.illinois.gov/2050/maps/eda](http://www.cmap.illinois.gov/2050/maps/eda))

Median Hhold. Income of Residents in 2012-16



## SP-25 Priority Needs - 91.415, 91.215(a)(2)

### Priority Needs

1	<b>Priority Need Name</b>	End Homelessness in Lake County
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	<b>Geographic Areas Affected</b>	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area
	<b>Associated Goals</b>	Improve homeless crisis response system
	<b>Description</b>	Absolute focus is needed to finish Lake County's work on ending homelessness. During the past five years, Lake County and its HUD Continuum of Care, the Lake County Coalition for the Homeless, joined the Built for Zero national collaboration to end homelessness. Built for Zero provided extensive technical assistance and peer consultation that assisted in the establishment of Lake County's coordinated entry process and high-quality "by-name" list. Using data and actual client contact in a coordinated "entry" into the homeless services system, Lake County's homeless service providers are able to prioritize scarce housing resources for homeless people and families with the most critical needs. In 2020, Lake County was among the first ten communities in the United States to end veteran homelessness, after which it set its sights on ending chronic homelessness ---a life-threatening condition --- as soon as possible. To now end chronic homelessness and then

		to end youth & family homelessness, this Plan emphasizes the goal to Improve the Homeless Crisis Response System in Lake County and more quickly move people who are homeless into housing.
	<b>Basis for Relative Priority</b>	Lake County's four priority needs are considered on par and symbiotic with each other. The extent to which Plan activities focus on addressing one need over another stems from the timing of community progress and projects available to fund which address each need.
<b>2</b>	<b>Priority Need Name</b>	Improving infrastructure serving LMI residents
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area

	<b>Associated Goals</b>	<p>Maximize Affordable Housing</p> <p>Improve Homeless Crisis Response System</p> <p>Enhance the living environment for the Lake County LMI population</p>
	<b>Description</b>	<p>"Long-term regional prosperity requires economic opportunity for all residents and communities" according to ON TO 2050, the long-range strategic plan authored by the Chicago Metropolitan Agency for Planning (CMAP). It goes on to explain that "To compete in the global economy, we (the Chicago metropolitan region) must tap the full potential of all our workers, businesses, and infrastructure. Currently, a substantial portion of the region's human capital --- embodied in the talents and skills of excluded residents --- is being wasted. Paired with other strategies to capitalize on the region's economic assets, emphasizing inclusive economic initiatives can help restart long-term growth in disinvested places and increase prosperity across the region." CMAP's recommendations to address inequality includes an area ripe for Community Development Block Grant (CDBG) investment, "Invest in Disinvested Areas". The strategies identified by CMAP include: (1) Identify new solutions and target existing resources in disinvested areas; (2) Target assistance in rapidly changing areas to preserve affordability, quality of life and community character"; (3) Create opportunity for low capacity communities for infrastructure investments; and (4) Build municipal, nonprofit and private sector capacity to access funding and financial resources.</p> <p>(<a href="http://www.cmap.illinois.gov/2050/community/disinvested-areas">www.cmap.illinois.gov/2050/community/disinvested-areas</a>)</p>
	<b>Basis for Relative Priority</b>	<p>Lake County's four priority needs are considered on par and symbiotic with each other. The extent to which Plan activities focus on addressing one need over another stems from the timing of community progress and projects available to fund which address each need.</p>
	<b>3</b>	
	<b>Priority Need Name</b>	Increasing affordable housing supply
	<b>Priority Level</b>	High
	<b>Population</b>	<p>Extremely Low</p> <p>Low</p> <p>Moderate</p> <p>Middle</p> <p>Large Families</p> <p>Families with Children</p> <p>Elderly</p> <p>Public Housing Residents</p> <p>Rural</p> <p>Chronic Homelessness</p> <p>Individuals</p> <p>Families with Children</p> <p>Mentally Ill</p>

		Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Mundelein Area Round Lakes Area Waukegan Area Zion Area Fox Lake Area North Chicago Area High Outcome Areas Highwood Area
	<b>Associated Goals</b>	Maximize Affordable Housing Enhance the living environment for the Lake County LMI population
	<b>Description</b>	Lake County residents need more access to quality affordable housing. The need to produce more units of affordable units across the County in the Consolidated Plan cycle is evident. Lake County must continue to focus investment into increasing the supply of affordable housing units, especially in high outcome areas. In addition, Lake County must continue to look to invest into improving the condition of the existing housing stock, focusing on areas with concentrations of low and moderate-income households.
	<b>Basis for Relative Priority</b>	All four priority needs are equal priority.
4	<b>Priority Need Name</b>	Expanding the capacity of the service provider network
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children

	<p>Elderly</p> <p>Public Housing Residents</p> <p>Rural</p> <p>Chronic Homelessness</p> <p>Individuals</p> <p>Families with Children</p> <p>Mentally Ill</p> <p>Chronic Substance Abuse</p> <p>veterans</p> <p>Persons with HIV/AIDS</p> <p>Victims of Domestic Violence</p> <p>Unaccompanied Youth</p> <p>Elderly</p> <p>Frail Elderly</p> <p>Persons with Mental Disabilities</p> <p>Persons with Physical Disabilities</p> <p>Persons with Developmental Disabilities</p> <p>Persons with Alcohol or Other Addictions</p> <p>Persons with HIV/AIDS and their Families</p> <p>Victims of Domestic Violence</p> <p>Non-housing Community Development</p>
<b>Geographic Areas Affected</b>	<p>Round Lakes Area</p> <p>Waukegan Area</p> <p>Zion Area</p> <p>Fox Lake Area</p> <p>North Chicago Area</p>
<b>Associated Goals</b>	<p>Maximize Affordable Housing</p> <p>Improve Homeless Crisis Response System</p> <p>Enhance the living environment for the Lake County LMI population</p>
<b>Description</b>	<p>Lake County has an exceptional geography, containing both urban and rural areas. This creates a great need for public transportation regardless of municipal or township boundaries. In Lake County, basic needs include having a car, which adds to a family's fixed expenses because the needed public transportation system is not as robust as needed. Without a car, most Lake County residents can reach neither services, like healthcare, nor their jobs.</p>
<b>Basis for Relative Priority</b>	<p>Lake County's four priority needs are considered on par and symbiotic with each other. The extent to which Plan activities focus on addressing one need over another stems from the timing of community progress and projects available to fund which address each need.</p>



## **Narrative (Optional)**

Lake County, along with its partners, has identified four high priority needs for the community over the next five years. The community-wide priorities most pressing to address in this Five-Year Plan are the need to End Homelessness in Lake County while also addressing the needs of improving infrastructure, increasing affordable housing and expanding the capacity of the service provider network. Addressing these four needs will take time, so priority will be given in 2025-2029 HUD funding rounds to the needs for which solutions are well-developed, funded and ready to implement.

In other words, 2025-2029 HUD-funded programs and projects that address these four needs will be prioritized based on the extent to which they meet community goals and multiple other factors, the most important of which is project readiness.

## SP-30 Influence of Market Conditions - 91.415, 91.215(b)

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	Percent occupancy of affordable rental units.
TBRA for Non-Homeless Special Needs	Percent occupancy of affordable rental units.
New Unit Production	Permits issued for residential new construction.
Rehabilitation	Percentage of housing stock with more than one selected characteristic.
Acquisition, including preservation	Homeownership rates in low/mod areas of Lake County.

**Table 41 – Influence of Market Conditions**

## **SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)**

### **Introduction**

The identified resources include Program Year 2025 (PY25) entitlement funds, program income and unallocated prior year funds.

Prior year funds include:

PY2020 - \$24,333 HOME

PY2023 - \$8,766 CDBG

PY2024 - \$134,857 CDBG

## Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation:	Program Income:	Prior Year Resources:	Total:		
<b>CDBG</b>	<b>Federal - HUD</b>	See Table 55a	\$2,890,601	\$85,480	\$167,956	\$3,144,037	\$11,562,404	CDBG funds will be used to support Community development in Lake County's target areas and to support affordable housing efforts throughout Lake County.
<b>HOME</b>	<b>Federal - HUD</b>	See Table 55a	\$1,463,749	\$167,957	\$0	\$1,631,705	\$5,854,994	HOME funds will be used to develop affordable housing for low-income communities, including new construction and rehabilitation of single- and multi-family units
<b>ESG</b>	<b>Federal - HUD</b>	See Table 55a	\$221,534	\$0	\$0	\$221,534	\$886,136	ESG funds will be used to assist persons experiencing homelessness with outreach, shelter services and rapid rehousing services.

Table 42 - Anticipated Resources

<u>Funding Source</u>		
CDBG	HOME	ESG
<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Admin and Planning</li> <li>• Economic Development</li> <li>• Housing</li> <li>• Public Improvements</li> <li>• Public Services</li> </ul>	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Homebuyer assistance</li> <li>• Homeowner rehab</li> <li>• Multifamily rental new construction</li> <li>• Multifamily rental rehab</li> <li>• New construction for ownership</li> <li>• TBRA</li> </ul>	<ul style="list-style-type: none"> <li>• Conversion and rehab for transitional housing</li> <li>• Financial Assistance</li> <li>• Overnight shelter</li> <li>• Rapid re-housing (rental assistance)</li> <li>• Rental Assistance</li> <li>• Services <ul style="list-style-type: none"> <li>• Transitional housing</li> </ul> </li> </ul>

Table 55a

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

The CDBG Program does not require matching funds, however Lake County incentivizes outside investment during the CDBG application process. Project applications are scored based on their ability to attract outside investment and the amount of leveraged funding provided in the budget.

The ESG Program regulations require 100% match. This requirement is met through local funds (Lake County Affordable Housing fund) and private funds. Most ESG-funded projects also receive State dollars for ongoing service and operations costs.

The HOME Program regulations require a 25% match. Match requirements are met by developer contributions, municipal investments, local fundraising, bank financing, First Time Home Buyer grants, and State of Illinois affordable housing funds.

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

Lake County works closely with all municipalities located within the geographic boundaries. It is anticipated the funding covered under this plan could be used to support publicly owned land to address the affordable housing needs of Lake County. An example would be the partnership with a municipality to utilize CDBG funds to support the demolition of a dilapidated structure. The funding would alongside a deed restriction limiting future use to affordable housing.

## Discussion

The identified resources for Program Year 2025 (PY25) include entitlement funds (CDBG, HOME and ESG), program income and unallocated prior year funds.

Prior year funds include:

PY2020 - \$24,333 HOME

PY2023 - \$8,766 CDBG

PY2024 - \$134,857 CDBG

Prior Year (PY) CDBG and HOME funds are the result of projects being completed under budget, or project no longer being viable making the funds available for reallocation.

## SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Lake County Coalition for the Homeless	Continuum of Care	Homelessness Rental	Jurisdiction
Community Partners for Affordable Housing	CHDO	Homelessness Ownership Rental	Region
PADS Lake County	Non-profit organizations	Homelessness	Jurisdiction
Catholic Charities	Community/Faith-based organization	Homelessness Rental	Jurisdiction
Kids Above All	Non-profit organizations	Economic Development Homelessness Non-homeless special needs	Region
Thresholds	Non-profit organizations	Homelessness	Region

Table 43 - Institutional Delivery Structure

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

Lake County is fortunate to have numerous non-profit and agency partners with which to implement this HUD Strategic Plan. In several key work areas of this plan exist broad-ranging membership organizations that collaborate across Lake County, easing the implementation task. In ending homelessness, the County's key partner is the Lake County Coalition of the Homeless (LCCH) ([www.lakecountyhomeless.org](http://www.lakecountyhomeless.org)) comprised of numerous homeless service and housing agencies which have reviewed and proposed the projects in Goal #2) Improve Homeless Crisis Response System. Several non-profits are working with LCCH to implement the recommendations in the CSH Gap Analysis of Lake County's homeless crisis response system, including Catholic Charities, Kids Above All, The Harbor, PADS and Thresholds.

For Goal #3) Enhance the living environment for the Lake County LMI population, Lake County's partners include municipalities, townships and non-profits working collaboratively to enhance access and job creation/business opportunities in the region primarily for low- and moderate-income workers and people with disabilities.

In order to Maximize Affordable Housing (Goal #1), Lake County works with the handful of affordable housing developers doing work in Lake County plus numerous non-profit organizations with varying

level of housing experience. The County's key housing partner is Community Partners for Affordable Housing, which was selected for this 2025-2029 period to manage Lake County's down-payment assistance, owner-occupied rehabilitation and community land trust programs.

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

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

Table 44 - Homeless Prevention Services Summary

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

The homeless crisis response system in Lake County responds to the needs of persons experiencing homelessness through engagement and connection to services and housing. The Lake County Coalition for the Homeless oversees the Coordinated Entry system to ensure that all agencies who may serve as the first point of engagement with persons experiencing homelessness can quickly connect the household to the resources they need. Emergency shelters, street outreach, mainstream system, and other providers may serve as points of entry into the system. Once identified at a point of entry,



households are referred to the housing and other resources most appropriate to them. Those experiencing literal homelessness are referred to the Coordinated Entry By-Name List, where they are assessed and prioritized for housing such as permanent supportive housing, rapid rehousing, or other subsidized housing resources. Many of these resources are prioritized for subpopulations including those experiencing chronic homelessness and veteran households.

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

Lake County continually reassesses the system to identify areas of strength and address gaps utilizing System Performance Metrics (SPMs). These metrics are analyzed as a whole and specific to subpopulations including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. For a more thorough description of these metrics and a summary of the metrics over the last several years, please see the “NA-40 Homeless Needs Assessment” section of this document.

Additionally, Lake County partnered with the Lake County Coalition for the Homeless and Corporation for Supportive Housing to conduct a thorough assessment of gaps, resulting in the *Gaps Analysis of the Homeless Crisis Response System in Lake County* report. To view the full report, please visit [www.lakecountyhomeless.org](http://www.lakecountyhomeless.org).

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

As part of the citizen participation process, Lake County collaborated with the Lake County Coalition for the Homeless (LCCH) and Corporation for Supportive Housing (CSH) to conduct a thorough Gaps Analysis of the Homeless Crisis Response System. The Gaps Analysis process included multiple citizen participation activities, including: interviews with key stakeholders, a Survey of Homeless Needs distributed among residents and service providers, a Housing Placement Satisfaction Survey distributed to homeless services clients, and a Coordinated Entry Survey distributed to clients who had been housed through the Coordinated Entry process. This input was incorporated into a comprehensive *Gaps Analysis of the Homeless Crisis Response System* report, published June 2019, which identified 15 gaps and provided recommendations of how to address these needs of Lake County residents experiencing homelessness. The recommendations fit into three main categories: Initial Crisis Response (Points of Entry), Housing Interventions, and Administrative Improvements.

Once the 15 gaps and recommendations were identified, the issues were discussed at multiple meetings including meetings of the Lake County Coalition for the Homeless, Housing and Community Development Commission, and Homelessness Advisory and Recommendation Committee. Discussions at these bodies continue to shape Lake County’s three goals and four priority needs, described in the “SP-45 Goals” and “SP-25 Priority Needs” sections of this document. As all Lake County HUD funding

must align with the goals and priority needs, Lake County anticipates that many of the activities conducted over the coming year will be positioned to directly overcome the gaps identified.

To view the full *Gaps Analysis of the Homeless Crisis Response System* report, please visit [www.lakecountyhomeless.org](http://www.lakecountyhomeless.org).

DRAFT

## SP-45 Goals - 91.415, 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Maximize Affordable Housing	2025	2029	Affordable Housing	Countywide	Increasing affordable housing supply	CDBG: \$7,225,662 HOME: \$6,754,824	Direct Financial Assistance to Homebuyers: 50  Homeowner Housing Added: 40  Homeowner Housing Rehabilitated: 60  Public service activities other than low/mod income housing benefit: 475  Rental units constructed: 250  Rental units rehabilitated: 320
2	Improve Homeless Crisis Response System	2025	2029	Homeless	Countywide	End Homelessness in Lake County	CDBG: \$1,328,065 ESG: \$1,024,595	Rental units rehabilitated: 15  Public service activities other than low/mod income housing benefit: 1330
3	Enhance the Living Environment for the Lake County LMI Population	2025	2029	Community Development	Countywide	Improving infrastructure serving	CDBG: \$3,262,113	Public service activities other than low/mod income housing benefit: 2664

						LMI residents Expanding the capacity of the service provider network		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 28130
4	Program Administration	2025	2029	Program Administration	Countywide	Program Administration	CDBG: \$2,890,600 HOME: \$731,875 ESG: \$83,075	Other: 5 Other

Table 45 – Goals Summary

### Goal Descriptions

1	Goal Name	Maximize Affordable Housing
	Goal Description	To provide a decent home and suitable living environment for low-and moderate-income households by preserving and expanding Lake County's affordable housing stock through acquisition, rehabilitation, new construction, and rental assistance activities.
2	Goal Name	Improve Homeless Crisis Response System
	Goal Description	Lake County is prioritizing investments into improving the entirety of the Homeless Response System.

		<p style="text-align: center;"><b>Homeless Crisis Response System</b></p> <p>All components of the system (excluding “Unsubsidized Housing”) are eligible for funding under this ConPlan and it is the intent to invest the maximum amount funding allowable under regulatory limits.</p>
<b>3</b>	<b>Goal Name</b>	<b>Enhance the Living Environment for the Lake County LMI Population</b>
	<b>Goal Description</b>	Activities funded under this goal are designed to directly serve the low and moderate income (LMI) population of Lake County. A focus will be on accessibility improvement to public facilities, infrastructure improvements in LMI census tracts, and funding for service agencies serving the Lake County residents meeting the HUD low and moderate clientele (LMC) presumed benefit definition.
<b>4</b>	<b>Goal Name</b>	<b>Program Administration</b>
	<b>Goal Description</b>	Each source of HUD funding (CDBG, HOME, ESG) provides funding for planning and administration of these grant programs, which are managed by Lake County Community Development Program administration.

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

It is estimated that throughout program years 2025-2029 Lake County will provide 400 extremely low-income, low-income, and moderate-income families a form of affordable housing as defined by HOME 91.315(b)(2)

## **SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c)**

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

Lake County Housing Authority is compliant with the Section 504 Voluntary Compliance Agreement (VCA). The Housing Authority provides reasonable accommodations to applicants with disabilities. The authority provides information on fair housing laws and resources for residents. LCHA maintains over 10% of its units for elderly and persons with disabilities thereby demonstrating compliance with Section 504 requirements.

Of the 150 public housing units maintained by North Chicago Housing Authority nine units are accessible at Kula Towers and six units are accessible at Thompson Manor.

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

Lake County Housing Authority maintains a Resident Advisory Board (RAB) which plays a crucial role in the development of housing authority plans. The RAB provides feedback on proposed changes to the Housing Voucher Choice Program and other housing policies, ensuring that resident perspectives are considered during decision making processes.

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

Lake County Housing Authority and Waukegan Housing Authority are designated as standard under 24 CFR part 902. North Chicago Housing Authority designated as troubled with the Section Eight Management Assessment Program.

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

North Chicago Housing Authority is currently undergoing a Voucher System Management Review, which will assist in providing strategies to correct the deficiencies.

## **SP-55 Strategic Plan Barriers to Affordable Housing - 91.415, 91.215(h)**

### **Barriers to Affordable Housing**

In Lake County several factors hinder the availability of affordable housing and residential investment. Factors include high land and construction costs, restrictive zoning and land use regulations, and lack of financial support for affordable housing development. Many municipalities within the County maintain zoning codes that limit housing development through single-family only zoning, large minimum lot sizes and height and density caps that prohibit or discourage multifamily and affordable housing developments. These restrictions reduce the range of housing types available, particularly those that are more affordable. Large minimum lot requirements and low-density zoning increases the cost per unit of land acquisition and reduces financial feasibility of affordable development, especially in high-opportunity areas. Delays created by local development approvals such as plan reviews, public hearings, and lengthy approval timelines often hinder affordable housing projects which are time sensitive due to funding source requirement. The lack of zoning incentives, tax abatements and expedited permitting that support affordable housing is prohibitive when market-rate housing is more profitable for developers. Some municipalities impose impact fees and other cost prohibitive fees that disproportionately affect affordable housing developments. Due to zoning, fee structures and slow permitting timelines, developers face lower profit margins and longer development horizons. Without offsetting incentives, the return on investment is often too low to attract and retain affordable housing developers. While these policies are not intentionally exclusionary, their cumulative impact contributes to a constrained housing market and further discourages investment in affordable housing. To overcome these barriers zoning reform, incentives, improved approval process, community education and a stronger coordination among local authorities to ensure affordable housing development is prioritized and align land use policies with affordable housing goals.

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

To address these barriers and support the development of a broader range of housing options, Lake County will implement the following strategies:

#### **1. Zoning Reform and Technical Assistance**

- o Lake County has partnered with Chicago Metropolitan Agency for Planning to implement a 12-month technical assistance process which will convene a Housing Task Force comprising of municipalities across Lake County to evaluate tools and resources to address housing challenges, culminating in step-by-step Housing Ready toolkits. This effort aims to promote model zoning codes that reduce minimum lot sizes and eliminate exclusionary practices.

#### **2. Incentivize Affordable Housing Development**

- o Lake County offers an Affordable Housing Tax Credit in accordance with a state-level tax incentive program in an effort to create and preserve affordable



housing. This credit offers a reduction in assessed value for affordable housing development and rehabilitation.

- o Explore and advocate for the implementation of local tax abatements, density bonuses, and reduced or waived development fees for projects that include affordable units.

### **3. Streamline Development Processes**

- o Work with local governments to streamline approval processes for affordable housing through pre-approved site plans, expedited permitting, and administrative reviews where feasible.

### **4. Promote Community Education and Engagement**

- o Launch a public education campaign to address misconceptions about affordable housing and highlight its benefits to community stability and economic growth.
- o Engage residents early in the planning process to build support and reduce resistance.

### **5. Foster Interjurisdictional Collaboration**

- o Facilitate regional planning efforts and shared best practices among municipalities to promote consistent affordable housing strategies and align land use policies with housing needs.
- o Support joint applications for funding and collaborative development efforts.

### **6. Monitor and Evaluate Progress**

- o Track changes in local policies and development outcomes to assess the impact of reform efforts.
- o Provide regular reporting to stakeholders and adjust strategies as needed to ensure continued progress toward housing affordability goals.

## **SP-60 Homelessness Strategy - 91.415, 91.215(d)**

Describe how the jurisdiction's strategic plan goals contribute to:

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

Lake County is committed to improving its ability to reach individuals and families experiencing homelessness and to more effectively assess and respond to their individual needs. This work builds on the foundational recommendations from the Corporation for Supportive Housing (CSH) and ongoing collaboration with the Lake County Coalition for the Homeless (LCCH), which serves as the County's Continuum of Care (CoC).

A key strategic goal is to implement a Housing-Focused Street Outreach model aligned with best practices recommended by the National Alliance to End Homelessness. This approach will center on proactive, person-centered engagement that connects unsheltered individuals directly to the Coordinated Entry System (CES). The vision is to develop multidisciplinary outreach teams equipped to conduct mobile assessments, including the VI-SPDAT, and to coordinate with behavioral health providers, law enforcement, and local service organizations.

Lake County has taken significant steps to expand access to the CES by forming partnerships with key community institutions. Notably, the County is piloting a Coordinated Entry access point in collaboration with Waukegan Township, providing a local, accessible site where individuals experiencing or at risk of homelessness can connect to assessment and referral services. Additionally, a local community college has joined the effort, offering another access point that reaches a broader segment of the population—particularly students and young adults facing housing instability. These new partnerships allow the CES to reach individuals who may not self-identify as homeless or who have not previously engaged with the homeless response system.

The Lake County CoC and LCCH are establishing a Persons with Lived Expertise and Experience (PLEE) Advisory Board. This advisory body will play a central role in shaping outreach strategies and ensuring that system design reflects the perspectives and priorities of those who have experienced homelessness firsthand. The PLEE Board will offer input on how best to engage unsheltered individuals, advise on reducing access barriers, and support peer-informed practices that build trust and improve engagement outcomes.

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

Lake County is taking important steps to strengthen its emergency and transitional housing options for people experiencing homelessness. In recent years, the County has prioritized

improving access to shelter for both families and individuals without children, while also responding to the increasing number of residents facing chronic homelessness.

A major focus of this work is the renovation of the former Travelodge hotel into a year-round, fixed-site emergency shelter for families. In partnership with PADS Lake County, the County is transforming the way it delivers shelter—moving away from seasonal, rotating-site models toward a consistent and service-enriched environment. Once completed, this shelter will provide families with safe, stable accommodations and better access to case management and housing services.

Lake County recognizes the need for a similar shelter option for adult-only households (AOH), particularly single individuals who are often underserved by the current system. The County has made investments to support rezoning efforts that enable shelter development and remains committed to pursuing a site that can meet the needs of this population.

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

Lake County remains committed to helping individuals and families experiencing homelessness move quickly into permanent housing and maintain long-term housing stability. Building on past successes, including the County's certification of reaching functional zero for veteran homelessness in 2019 through the U.S. Interagency Council on Homelessness and the Built for Zero campaign, the focus is now on sustaining that progress while addressing the needs of other vulnerable populations—especially families with children, chronically homeless individuals, unaccompanied youth, and veterans.

One of the County's key strategies for the next five years is the expansion of Permanent Supportive Housing (PSH). In recent years, Lake County has experienced a significant rise in chronic homelessness, highlighting a growing mismatch between need and available long-term housing solutions. In response, PADS Lake County, the Lake County Housing Authority, and Community Partners for Affordable Housing are participating in a PSH Institute facilitated by the Corporation for Supportive Housing (CSH). This initiative is helping to build capacity among local partners to develop and operate high-quality supportive housing units that combine affordable housing with wraparound services.

Lake County will also continue its strong collaboration with the Lake County Housing Authority and other Public Housing Agencies (PHAs). Over the last five years, this partnership has

strengthened significantly, resulting in dedicated staff at the Housing Authority who focus specifically on connecting people experiencing homelessness to housing opportunities. The County and CoC will build on this progress by continuing to coordinate with PHAs to prioritize households experiencing homelessness for Housing Choice Vouchers, improve access through supportive services such as document collection and application assistance, and explore set-asides or “Moving On” strategies for PSH tenants ready to transition to independent living.

By expanding supportive housing, sustaining partnerships with housing authorities, and investing in a more coordinated prevention system, Lake County is working to shorten the length of time people experience homelessness, reduce returns to homelessness, and ensure that all residents have a clear and supported path to permanent housing and independence

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

Preventing homelessness before it begins remains one of Lake County’s highest priorities. System Performance Measures (SPMs) and Longitudinal Systems Analysis (LSA) data show that 84% of individuals entering the homeless response system are experiencing homelessness for the first time.

Over the past several years, the County has expanded its homelessness prevention and diversion infrastructure through partnerships with key agencies including PADS Lake County, the Lake County Housing Authority, Waukegan Township, and Prairie State Legal Services. These organizations provide a variety of supportive services such as rental assistance, legal support, tenant-landlord mediation, and utility assistance—all aimed at helping households maintain their housing or divert from shelter when possible. Looking forward, the County’s goal is to build a more centralized and coordinated approach to prevention and diversion using the existing Coordinated Entry system as the primary access point. This approach will allow providers to assess risk factors earlier, match households to the most appropriate prevention resources, and ensure accountability through shared data systems.

## **SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)**

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

Lake County will continue all compliance activities prescribed in 24 CFR Part 35. All potential projects are evaluated for Lead Based Paint (LBP) hazards. If LBP hazards are identified to be present, abatement activities (as appropriate) are incorporated into the project scope. The abatement of LBP hazards via the Owner-Occupied Rehabilitation Program (OORP) continues to be the most effective means for Lake County to increase access to housing for LMI households. LBP hazard identification and abatement are included into the standard procedure for the Lake County OORP. The OORP is supported with CDBG and/or HOME funds and typically addresses approximately twenty households per program year.

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

There is a direct correlation between the spatial distribution of homes built prior to 1978 and areas of higher concentrations of LMI households. By identifying and targeting the geographic areas with the highest LMI concentrations for funding Lake County is simultaneously targeting areas with the greatest likelihood of LBP hazards being present.

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

The Lead Safe Housing Rule found at 24 CFR Part 35 requires that lead hazard evaluation and reduction activities be carried out for all developments constructed before 1978 that are acquired or rehabilitated with federal funds. Lake County mandates that applications for rehabilitation funds for existing buildings constructed prior to 1978 must include a lead hazard evaluation, by appropriate lead-certified personnel. The application must also include a detailed lead hazard reduction plan, in accordance with the regulations, and separately identify within the rehabilitation budget, the costs associated with reduction of lead hazards in accordance with the regulation and guidelines. All allocations will be contingent upon the applicant agreeing to complete lead hazard reduction, evidenced by a clearance report performed by appropriate lead-certified personnel. In a development where funds will be used on only a portion of the units, the lead-based paint requirements apply to all units and common areas in the development. Specific requirements vary depending on the type of work performed and the level of federal subsidy. For CDBG and HOME projects, the lead-based paint requirements established by the regulation fall into the major categories listed below: Some CDBG and HOME projects may be exempt from the Lead Safe Housing Rule if they meet the

criteria listed in 24 CFR 35.115

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## **SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)**

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

Lake County's 2023 Strategic Plan emphasizes expanding access to economic opportunities to strengthen the county's growth. This includes enhancing workforce development strategies aligned with projected local industry growth, promoting policies that reduce barriers to housing affordability, and increasing career exploration opportunities for youth and young adults.

To support families at or near the poverty level, Lake County continues to fund emergency assistance programs through agencies like Catholic Charities and local townships. These programs provide critical support to prevent homelessness and address immediate needs arising from unforeseen events such as illness or job loss.

Recognizing the importance of transportation in economic mobility, the county has launched initiatives like "Ride Lake County," a countywide paratransit service aimed at improving access to employment and essential services for seniors and individuals with disabilities.

In addressing food insecurity, Lake County supports a network of food banks and distribution programs, ensuring that residents across the county, including those in traditionally affluent areas, have access to nutritious food options.

The county also prioritizes affordable housing investments in high-opportunity areas while promoting transit-oriented development in low- and moderate-income (LMA) areas. This dual approach aims to connect residents with employment opportunities and essential services, fostering sustainable communities.

Educational attainment is another focus area, with programs like Mano a Mano's "Productive Parents" initiative offering training and counseling to prepare high school students, particularly from the Latinx community, for post-graduation opportunities such as college or trade school.

Through these comprehensive strategies, Lake County is committed to reducing poverty and enhancing economic mobility for all residents.

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

Lake County's 2020 Analysis of Impediments (AI) serves as a foundational framework for coordinating the jurisdiction's poverty reduction goals, programs, and policies with its affordable housing plan. The AI emphasizes the importance of locating affordable housing in

high-opportunity areas while simultaneously addressing poverty by enhancing transportation access to employment centers from regions with existing affordable housing.

A significant development highlighted in the AI is the utilization of the U.S. Census Bureau's "Opportunity Atlas," an interactive tool that maps the long-term outcomes of children based on their neighborhoods. The Atlas reveals that relocating to a better neighborhood earlier in childhood can substantially increase a child's future income. This insight underscores the AI's recommendation to prioritize the allocation of CDBG and HOME funds to housing projects near public transportation and employment centers, thereby facilitating upward economic mobility.

Furthermore, the AI identifies the persistent issue of housing affordability and its impact on racial and ethnic minorities. It notes that the cost of purchasing or renting housing in Lake County remains relatively unaffordable, contributing to concentrated areas of poverty. To mitigate this, the AI advocates for the revitalization of areas with existing affordable housing through investments in public facilities, infrastructure, and economic development, aiming to make neighborhoods more attractive and livable.

In alignment with these findings, Lake County's affordable housing plan incorporates strategies to expand the supply of housing near transit and employment hubs, especially outside areas already saturated with affordable housing. By doing so, the county seeks to address the housing-jobs-transit mismatch and promote access to opportunities.

In summary, the coordination between Lake County's poverty reduction initiatives and its affordable housing plan is deeply rooted in the insights provided by the 2020 AI. By focusing on strategic investments in housing and infrastructure, the county aims to dismantle barriers to fair housing and foster inclusive, economically vibrant communities.



## **SP-80 Monitoring - 91.230**

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

Lake County is responsible for ensuring that all activities further the goals and priority needs of the Consolidated Plan. Additionally, all HOME, CDBG, ESG, and NSP program activities, including those conducted by subrecipients and developers, must be compliant with the applicable federal regulations. Lake County ensures compliance with federal regulations at every stage of a project, including prior to funding a project, during project activities, and after project completion. The activities conducted at each stage of the project depend on the project or program type and funding source.

The first step to ensuring compliance with requirements is an extensive annual award project selection process. Housing, public improvements, human services, and homelessness programs and projects apply for funding in a competitive application process. Applications are scored based on scoring criteria. Demonstrated ability to abide by requirements, such as minority business outreach and fair housing, is reflected in an applicant's score. Additionally, all projects must align with the goals and priority needs of the Consolidated Plan and are only awarded if the activity furthers these goals.

During program activities and after project completion, subrecipients and developers are monitored for compliance to ensure activities abide by the funding requirements and grant agreement. The monitoring policies describe the standards and procedures used to monitor activities. Lake County conducts four types of monitoring: program monitoring, administrative and financial monitoring, activity-specific and project monitoring, and long-term monitoring. Monitoring activities and follow up may be conducted via desk reviews or on-site monitoring.

A risk assessment of Lake County's funded activities informs the Annual Monitoring Plan, which includes the monitoring strategy and methodology. The risk assessment considers various factors such as program complexity, funding, quality of reporting, and past compliance issues. The program or project type and funding source further determine the type of monitoring that is conducted. Programs currently being implemented receive annual on-site monitoring visits, and projects currently under development are monitored at periodic timeframes throughout the process, not less than once annually.

Projects that are complete and no longer under development enter a period of affordability where they must remain affordable according to the regulations. These projects undergo additional monitoring to ensure long-term compliance with the requirements of the applicable funding source. The length of the period of affordability and activities conducted during long-term compliance procedures vary depending on the type of project. Homebuyer projects are monitored for principal residency and compliance with resale or recapture requirements; rental projects are monitored for a multitude of factors, including compliance with rent and income restrictions, physical condition, and other management practices.

All monitoring activities align with HUD guidance and utilize HUD resources where possible.

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## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

#### Anticipated Resources

The identified resources include Program Year 2025 (PY25) entitlement funds, program income and unallocated prior year funds.

Prior year funds include:

PY2020 - \$24,333 HOME

PY2023 - \$8,766 CDBG

PY2024 - \$134,857 CDBG

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation:	Program Income:	Prior Year Resources:	Total:		
<b>CDBG</b>	<b>Federal - HUD</b>	See Table 59a	\$2,890,601	\$85,480	\$167,956	\$3,144,037	\$11,562,404	CDBG funds will be used to support Community development in Lake County's target areas and to support affordable housing efforts throughout Lake County.
<b>HOME</b>	<b>Federal - HUD</b>	See Table 59a	\$1,463,749	\$167,957	\$0	\$1,631,705	\$5,854,994	HOME funds will be used to develop affordable housing for low-income communities, including new construction and rehabilitation of single- and multi-family units
<b>ESG</b>	<b>Federal - HUD</b>	See Table 59a	\$221,534	\$0	\$0	\$221,534	\$886,136	ESG funds will be used to assist persons experiencing homelessness with outreach, shelter services and rapid rehousing services.

**Table 46 - Expected Resources – Priority Table**

<u>Funding Source</u>		
CDBG	HOME	ESG
<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Admin and Planning</li> <li>• Economic Development</li> <li>• Housing</li> <li>• Public Improvements</li> <li>• Public Services</li> </ul>	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Homebuyer assistance</li> <li>• Homeowner rehab</li> <li>• Multifamily rental new construction</li> <li>• Multifamily rental rehab</li> <li>• New construction for ownership</li> <li>• TBRA</li> </ul>	<ul style="list-style-type: none"> <li>• Conversion and rehab for transitional housing</li> <li>• Financial Assistance</li> <li>• Overnight shelter</li> <li>• Rapid re-housing (rental assistance)</li> <li>• Rental Assistance</li> <li>• Services <ul style="list-style-type: none"> <li>• Transitional housing</li> </ul> </li> </ul>

Table 59a

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

The CDBG Program does not require matching funds, however Lake County incentivizes outside investment during the CDBG application process. Project applications are scored based on their ability to attract outside investment and the amount of leveraged funding provided in the budget.

The ESG Program regulations require 100% match. This requirement is met through local funds (Lake County Affordable Housing fund) and private funds. Most ESG-funded projects also receive State dollars for ongoing service and operations costs.

The HOME Program regulations require a 25% match. Match requirements are met by developer contributions, municipal investments, local fundraising, bank financing, First Time Home Buyer grants, and State of Illinois affordable housing funds.

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

Lake County works closely with all municipalities located within the geographic boundaries. It is anticipated the funding covered under this plan could be used to support publicly owned land to address the affordable housing needs of Lake County. An example would be the partnership with a municipality to utilize CDBG funds to support the demolition of a dilapidated structure. The funding would alongside a deed restriction limiting future use to affordable housing.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Maximize Affordable Housing	2025	2026	Affordable Housing	Countywide	Increasing affordable housing supply	CDBG: \$1,624,487 HOME: \$1,485,330	Direct Financial Assistance to Homebuyers: 15  Homeowner Housing Added: 21  Homeowner Housing Rehabilitated: 15  Public service activities other than low/mod income housing benefit: 101  Rental units constructed: 73  Rental units rehabilitated: 229
2	Improve Homeless Crisis Response System	2025	2026	Homeless	Countywide	End Homelessness in Lake County	CDBG: \$176,015 ESG: \$204,919	Rental units rehabilitated: 15  Public service activities other than low/mod income housing benefit: 1330

<b>3</b>	<b>Enhance the Living Environment for the Lake County LMI Population</b>	2025	2026	Community Development	Countywide	Improving infrastructure serving LMI residents  Expanding the capacity of the service provider network	CDBG: \$765,415	Public service activities other than low/mod income housing benefit: 2664  Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 28130
<b>4</b>	<b>Program Administration</b>	2025	2026	Program Administration	Countywide	Program Administration	CDBG: \$578,120 HOME: \$146,375 ESG: \$16,615	Other: 5 Other

### Goal Descriptions

<b>1</b>	<b>Goal Name</b>	<b>Maximize Affordable Housing</b>
	<b>Goal Description</b>	To provide a decent home and suitable living environment for low-and moderate-income households by preserving and expanding Lake County's affordable housing stock through acquisition, rehabilitation, new construction, and rental assistance activities.
<b>2</b>	<b>Goal Name</b>	<b>Improve Homeless Crisis Response System</b>
	<b>Goal Description</b>	Lake County is prioritizing investments into improving the entirety of the Homeless Response System.



		<p style="text-align: center;"><b>Homeless Crisis Response System</b></p> <p>All components of the system (excluding “Unsubsidized Housing”) are eligible for funding under this ConPlan and it is the intent to invest the maximum amount funding allowable under regulatory limits.</p>
<b>3</b>	<b>Goal Name</b>	<b>Enhance the Living Environment for the Lake County LMI Population</b>
	<b>Goal Description</b>	Activities funded under this goal are designed to directly serve the low and moderate income (LMI) population of Lake County. A focus will be on accessibility improvement to public facilities, infrastructure improvements in LMI census tracts, and funding for service agencies serving the Lake County residents meeting the HUD low and moderate clientele (LMC) presumed benefit definition.
<b>4</b>	<b>Goal Name</b>	<b>Program Administration</b>
	<b>Goal Description</b>	Each source of HUD funding (CDBG, HOME, ESG) provides funding for planning and administration of these grant programs, which are managed by Lake County Community Development Program administration.

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## AP-35 Projects - 91.420, 91.220(d)

### Introduction

#	Project Name
1	Owner Occupied Rehabilitation
2	Down Payment Assistance
3	Acquisition of Affordable Rental Housing
4	New Construction - Rental
5	Rehabilitation of Affordable Rental Housing
6	New Construction - Homebuyer
7	Affordable Housing Rehabilitation and Resale
8	CHDO Operating
9	Public Services
10	Facility Improvements - Special Needs
11	Public Facilities and Infrastructure
12	Program Administration

**Table 47 – Project Information**

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

Allocation priorities are primarily a function of the scoring of the applications received from community partners. Scoring criteria was formulated from the priority needs and goals identified during the consultation process and how well each potential project addresses those needs/goals. The amount of funding that can be made available represents the main obstacle to addressing underserved needs.

The amount of funding requested received by Lake County consistently exceeds the amount funds that can be made available.

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Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Owner Occupied Rehabilitation		Maximize Affordable Housing	Increasing affordable housing supply	CDBG: \$187,000 HOME: \$331,773	Owner Occupied Rehabilitation	April 30, 2026		Countywide	<ul style="list-style-type: none"> <li>Community Partners for Affordable Housing \$253,071</li> <li>City of Waukegan \$266,402</li> </ul>
Down Payment Assistance		Maximize Affordable Housing	Increasing affordable housing supply		Down Payment Assistance	April 30, 2026		Countywide	<ul style="list-style-type: none"> <li>Community Partners for Affordable Housing \$200,000</li> </ul>
Acquisition of Affordable Rental Housing		Maximize Affordable Housing	Increasing affordable housing supply		Acquisition of Affordable Rental Housing	April 30, 2026		TBD	<ul style="list-style-type: none"> <li>Clearbrook \$150,000- CILA</li> <li>Community Partners for Affordable Housing \$150,000 CILA</li> </ul>
New Construction - Rental		Maximize Affordable Housing	Increasing affordable housing supply	HOME: \$775,000	New Construction - Rental	April 30, 2026		Village of Gurnee City of Waukegan	<ul style="list-style-type: none"> <li>Northpointe Development \$400,000</li> <li>Rhizome Development \$375,000</li> </ul>
Rehabilitation of Affordable Rental Housing		Maximize Affordable Housing	Increasing affordable housing supply	CDBG: \$312,982 HOME: \$83,738	Rehabilitation of Affordable Rental Housing	April 30, 2026		Village of Wauconda Village of Lake Bluff	<ul style="list-style-type: none"> <li>Full Circle Communities \$350,140</li> <li>A Safe Place \$46,580</li> </ul>
New Construction - Homebuyer		Maximize Affordable Housing	Increasing affordable housing supply	HOME: \$254,819	New Construction - Homebuyer	April 30, 2026		City of Lake Forest	<ul style="list-style-type: none"> <li>Community Partners for Affordable Housing \$254,819</li> </ul>

Affordable Housing Rehabilitation and Resale		Maximize Affordable Housing	Increasing affordable housing supply	CDBG: \$550,000	Affordable Housing Rehabilitation and Resale	April 30, 2026		City of Highland Park Countywide	<ul style="list-style-type: none"><li>• CCHI \$350,000</li><li>• Community Partners for Affordable Housing \$200,00</li></ul>
CHDO Operating		Maximize Affordable Housing	Increasing affordable housing supply	HOME: \$50,000	CHDO Operating	April 30, 2026		Countywide	<ul style="list-style-type: none"><li>• Community Partners for Affordable Housing \$50,00</li></ul>

Public Services		Improve Homeless Crisis Response System  Enhance the Living Environment for the Lake County LMI Population	Improving infrastructure serving LMI residents  Expand capacity of the service provider network	ESG: \$204,919  CDBG: \$433,590	Public Services	April 30, 2026		Countywide	<ul style="list-style-type: none"><li>• A Safe Place \$20,000 – Shelter</li><li>• Lake County Community Development \$30,000 - HMIS</li><li>• Kids Above All \$30,000 – Rapid Rehousing</li><li>• Lake County Haven \$20,000 – Shelter</li><li>• PADS Lake County \$47,320 - Shelter</li><li>• PADS Lake County \$61,485 - Intake</li><li>• PADS Lake County \$21,999 – Prevention and Diversion</li><li>• PADS Lake County \$77,000 – Outreach</li><li>• AAHAA \$15,000 – Healthcare Services</li><li>• Center for Enriched Living \$25,000 – Employment Services</li><li>• Eldercare \$20,000 – Transportation Services</li><li>• GLASA \$16,000 - Transportation Services</li><li>• Mano a Mano \$30,000 – Productive Parents Program</li><li>• NSLAC \$20,000 – Legal Services</li><li>• PADS Lake County \$26,550 – Transportation Services</li><li>• Prairie State Legal Services \$85,000 – Fair Housing</li><li>• Prairie State Legal Services \$35,385 – Housing Advocacy</li><li>• Youth Conservation Corps. \$32,000 – Youthbuild</li><li>• Zacharias Center \$15,385 – Youth Counseling</li><li>• Northern Illinois Food Bank \$5,000 – Food Bank</li><li>• Youthbuild Lake County \$5,385 - Youthbuild</li></ul>
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Facility Improvements - Special Needs		Enhance the Living Environment for the Lake County LMI Population	Improving infrastructure serving LMI residents	CDBG: \$322,470	Facility Improvements – Special Needs	April 30, 2026		Countywide	<ul style="list-style-type: none"><li>• Allendale \$47,470</li><li>• Lambs Farm \$125,000</li><li>• Nicasa \$150,000</li></ul>
Public Facilities and Infrastructure		Enhance the Living Environment for the Lake County LMI Population	Improving infrastructure serving LMI residents  Expand capacity of the service provider network	CDBG: \$259,175	Public Facilities and Infrastructure	April 30, 2026		City of North Chicago  City of Zion	<ul style="list-style-type: none"><li>• City of North Chicago \$169,175 – Sewer Lining</li><li>• City of Zion \$90,000 – Sidewalk Replacement</li></ul>
Program Administration		Program Administration	End Homelessness in Lake County  Improving infrastructure serving LMI residents  Increasing affordable housing supply  Expand capacity of the service provider network	CDBG: \$578,120  HOME: \$146,375  ESG: \$16,615	Program Administration	April 30, 2026		Countywide	<ul style="list-style-type: none"><li>• Lake County Community Development \$741,110</li></ul>



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## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

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

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Fox Lake Area	0
High Opportunity Areas	23
North Chicago Area	4
Round Lakes Area	0
Waukegan Area	10
Zion Area	9

**Table 48 - Geographic Distribution**

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

According to the 2019-2023 American Community Survey 5-Year Estimates, the areas listed above had a median income below the HUD income limit for a four-member household. This is strong indicator that families in these areas would be ideal candidates to receive HUD assistance. The geographic percentages for North Chicago and Waukegan reflect the partnership with Lake County (through an official Joint-Agreement among the three municipalities) to coordinate each municipalities' respective entitlement funds. The title of "High Opportunity Areas" refers to communities where beneficial social and economic factors enable greater upward economic mobility. Investing in affordable units located in High Opportunity Areas maximizes the benefit to low- and moderate-income families.

### **Discussion**

The Chicago Metropolitan Agency for Planning (CMAP) promotes inclusive growth, resilience, and prioritized investment in its On To 2050 report. Prioritized investments at the local area increases coordination across all local impacted agencies and helps increase local participation.

## Affordable Housing

### AP-55 Affordable Housing - 91.420, 91.220(g)

#### Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	33
Non-Homeless	306
Special-Needs	47
Total	353

Table 49 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	33
The Production of New Units	89
Rehab of Existing Units	249
Acquisition of Existing Units	15
Total	353

Table 50 - One Year Goals for Affordable Housing by Support Type

#### Discussion

Homeless households are assisted explicitly through rapid rehousing and tenant based rental assistance. Non-homeless households will be supported by owner-occupied rehabilitation, down payment assistance, homelessness prevention, the construction of new rental units, and acquisition/rehab/resale. While intake guidelines may or may not track homeless status at point of participation, it is assumed that some acquisition and rehab projects will assist households otherwise at risk of homelessness.

## **AP-60 Public Housing - 91.420, 91.220(h)**

### **Introduction**

Public housing and Housing Choice Voucher (HCVs) are essential tools for addressing the affordable housing needs of low-income individuals and families in Lake County, including the cities of Waukegan and North Chicago. The Lake County Housing Authority (LCHA) serves as the primary public housing agency (PHA) for most of Lake County, including unincorporated area and municipalities. Waukegan Housing Authority (WHA) and North Chicago Housing Authority (NCHA) independently operate public housing and voucher programs within in their respective communities.

These three housing authorities work to provide decent, safe and affordable housing to vulnerable populations, including seniors, individuals with disabilities and families with children.

Lake County and its municipal partners remain committed to working with LCHA, WHA, NCHA and other stakeholders to preserve existing public housing, reduce concentrations of poverty, and promote access to affordable housing opportunities and supportive services throughout the region.

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

LCHA housing continues to make significant progress with it's Section 18/Demo Disposition Program with the disposition of approximately 42 of 161 scattered site public housing unit. The units are sold to either the families currently residing in the unit or to affordable housing providers effectively ensuring continued housing affordability. Waukegan Housing Authority is currently working on the renovation of the Ravine Terrace public housing development using the U.S. Department of Housing and Urban Development's Rental Assistance Demonstration (RAD) Program. The Waukegan Housing Authority is expected to start the RAD conversion of Harry Poe Manor in late 2025.

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

Lake County Housing Authority (LCHA)

LCHA maintains a Resident Advisory Board (RAB) compiled of current public housing and housing voucher choice program participants. The RAB reviews and comments on LCHA's Annual and Five-Year Plans, provides feedback on policies, procedures and capital improvements and represents resident interest in planning and decision-making processes. During Lake County Housing Authority's PY2025 program period, the housing authority intends to pursue the development of the Housing Voucher Choice Homeownership Program which would allow Housing Voucher Choice holders to use their vouchers toward mortgage payments instead of rent creating long term housing stability for those participants.

LCHA also offers a comprehensive Housing Counseling Program aimed at promoting homeownership among its residents. This program provides free, expert guidance to all Lake County residents, regardless of income by HUD certified housing counselors.

## Waukegan Housing Authority (WHA)

WHA maintains a Resident Council which primarily focuses on administering social programs for residents and the council serves as a platform for residents to engage in community activities and express their needs. In addition, the WHA maintains a Resident Advisory Board (RAB) which provides residents with a forum to share information about the WHA's Annual Plan and make recommendations for its development. To promote homeownership WHA administers the Family Self Sufficiency Program that helps voluntary participants increase their earned income and develop financial independence. The program goals include education, employment, job training, financial literacy and homeownership counseling.

The efforts of the Lake County housing authorities show a clear commitment to not just providing housing, but also fostering resident leadership, economic mobility and long-term housing stability.

## **AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)**

### **Introduction**

Lake County works in close collaboration with the Lake County Coalition for the Homeless to ensure a responsive and coordinated homeless crisis response system that effectively serves individuals and families experiencing or at risk of homelessness. This system is designed to quickly engage those in need and connect them to appropriate housing and supportive services.

The Lake County Coalition for the Homeless manages the Coordinated Entry system, which helps streamline access to resources across multiple entry points. These entry points include emergency shelters, street outreach teams, mainstream service providers, and other community agencies. When individuals or households make initial contact through any of these access points, they are promptly connected to the services that best meet their needs.

Individuals facing literal homelessness are added to the Coordinated Entry By-Name List, where they are assessed and prioritized for housing interventions such as permanent supportive housing, rapid rehousing, or other subsidized housing options. Those at risk of becoming homeless are directed to Homelessness Prevention programs, which provide targeted support to stabilize their housing situation. Many of these services prioritize vulnerable populations, including individuals experiencing chronic homelessness and veterans.

Looking ahead, Lake County remains committed to supporting a network of partner agencies that deliver both access point and housing services. Over the next year, the County will continue to fund and coordinate with these organizations to strengthen the system and ensure that the needs of vulnerable residents are met with timely and appropriate support.

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

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

Over the next year, Lake County will strengthen its response to homelessness by expanding Street Outreach and improving shelter options. Case managers at homeless service agencies, including shelters, play a key role in helping individuals meet their unique needs. For people experiencing unsheltered homelessness, outreach staff go directly into the community to connect with individuals, assess their situations, and link them to services. This hands-on approach has produced strong results, even with limited staff. To build on that success, Lake County will increase the capacity of the PADS Street Outreach Team and adopt a Housing-Focused Street Outreach model. This approach focuses on building relationships, conducting mobile assessments like the VI-SPDAT, and working closely with behavioral health providers, law enforcement, and community organizations.

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

In partnership with PADS Lake County, Lake County is also transforming its shelter system. A major effort is underway to renovate the former Travelodge hotel into a year-round emergency shelter for families. This new shelter will offer consistent, stable housing along with easier access to case management and housing services. Lake County also understands the importance of having a similar shelter option for adult-only households, especially single individuals who are often left out of traditional shelter models. The County will continue to support efforts to identify a suitable location and bring together the resources needed to serve this population effectively.

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

Lake County remains committed to strengthening the homeless crisis response system by ensuring individuals and families are quickly connected to the most appropriate housing resources, such as permanent supportive housing (PSH), rapid rehousing, or other subsidized options. These efforts are especially focused on vulnerable subpopulations, including individuals experiencing chronic homelessness, veterans, and youth. To improve outcomes, system performance metrics are regularly reviewed to reduce returns to homelessness and shorten the time individuals spend without stable housing. At the same time, Lake County continues to build partnerships and invest in the expansion of affordable housing, with an emphasis on units dedicated to households experiencing homelessness.

In the coming year, Lake County will deepen its focus on Youth Homelessness. Allendale will be added as a Coordinated Entry site within the Homeless Management Information System (HMIS), improving access and data integration for youth-focused services. In partnership with the Lake County Coalition for the Homeless (LCCH), the Continuum of Care (CoC) will also launch a dedicated work group to address Youth Homelessness and coordinate targeted strategies. Additionally, Community Development is actively working to expand PSH capacity. A local cohort is currently participating in a PSH initiative led by the Corporation for Supportive Housing (CSH), aimed at building the infrastructure and expertise needed to increase sustainable PSH options.

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

**that address housing, health, social services, employment, education, or youth needs.**

Lake County's homeless crisis response system relies on strong partnerships and coordinated referral pathways to identify and support households at risk of homelessness before they lose housing. Homelessness prevention programs are a critical part of this effort, providing timely support that helps stabilize households and keep them in permanent housing. Over the next year, Lake County will continue to fund and support prevention services that address a range of risk factors contributing to housing instability. This includes legal advocacy services provided by Prairie State Legal Services and North Suburban Legal Aid Clinic, which help tenants navigate housing challenges and avoid eviction.

Individuals exiting institutions such as hospitals, mental health facilities, foster care, or the criminal justice system are at increased risk of experiencing homelessness without proper discharge planning. To address this, the CoC partners with the Illinois Department of Children and Family Services (DCFS) and the Lake County Health Department to ensure coordination and early connection to housing and support services. These partnerships help strengthen referral pathways and reduce gaps in care.

To further strengthen early intervention efforts, Lake County will continue building partnerships and improving coordination between government agencies and nonprofit providers serving low-income residents. A key initiative for the upcoming year is the creation of a Prevention and Diversion Workgroup in collaboration with LCCH and the CoC. This workgroup will focus on developing strategic solutions to enhance prevention efforts and streamline connections to services for those at risk.

### **Discussion**

Lake County addresses the needs of households experiencing homelessness and those at risk by operating at both the system and agency levels. Efforts are focused on strengthening service delivery through continuous improvement, with funding aligned to respond to identified needs. Regular assessment ensures that resources are prioritized to achieve the greatest possible impact for residents.

The County also continues to make progress through its involvement in Built for Zero, a national initiative led by Community Solutions. Through collaborative leadership within the Continuum of Care, Lake County is implementing data-informed strategies that aim to reduce the number of individuals experiencing homelessness and shorten the duration of their homelessness.



## **AP-75 Barriers to affordable housing - 91.420, 91.220(j)**

### **Introduction**

In Lake County several factors hinder the availability of affordable housing and residential investment. The factors include high land and construction costs, restrictive zoning and land use regulations, and lack of financial support for affordable housing development. Many municipalities within the County maintain zoning codes that limit or prohibit affordable housing development through single-family only zoning, large minimum lot sizes and height and density caps that prohibit or discourage multifamily and affordable housing developments. Large minimum lot requirements and low-density zoning increases the cost per unit of land acquisition and reduces financial feasibility of affordable development, especially in high-opportunity areas. Delays created by local development approvals such as plan reviews, public hearings, and lengthy approval timelines often hinder affordable housing projects which are time sensitive due to funding source requirement. The lack of zoning incentives, tax abatements and expedited permitting that support affordable housing is prohibitive when market-rate housing is more profitable for developers. Some municipalities impose impact fees and other cost prohibitive fees that disproportionately affect affordable housing developments. Due to zoning, fee structures and slow permitting timelines, developers face lower profit margins and longer development horizons. Without offsetting incentives, the return on investment is often too low to attract and retain affordable housing developers. To overcome these barriers zoning reform, incentives, improved approval process, community education and a stronger coordination among local authorities to ensure affordable housing development is prioritized and align land use policies with affordable housing goals.

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

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

To address these barriers and support the development of a broader range of housing options, Lake County will implement the following strategies:

#### **1. Zoning Reform and Technical Assistance**

- o Lake County has partnered with Chicago Metropolitan Agency for to implement a 12-month technical assistance process which will convene Housing Task Force comprising of municipalities across Lake County to evaluate tools and resources to address housing challenges, culminating in step-by-step Housing Ready toolkits. This effort aims to promote model zoning codes that reduce minimum lot sizes and eliminate exclusionary practices.

#### **2. Incentivize Affordable Housing Development**

- o Lake County offers an Affordable Housing Tax Credit in accordance with a state-level tax incentive program in an effort to create and preserve affordable housing. This credit

offers a reduction in assessed value for affordable housing development and rehabilitation.

- o Explore and advocate for the implementation of local tax abatements, density bonuses, and reduced or waived development fees for projects that include affordable units.

### **3. Streamline Development Processes**

- o Work with local governments to streamline approval processes for affordable housing through pre-approved site plans, expedited permitting, and administrative reviews where feasible.

### **4. Promote Community Education and Engagement**

- o Launch a public education campaign to address misconceptions about affordable housing and highlight its benefits to community stability and economic growth.
- o Engage residents early in the planning process to build support and reduce resistance.

### **5. Foster Interjurisdictional Collaboration**

- o Facilitate regional planning efforts and shared best practices among municipalities to promote consistent affordable housing strategies and align land use policies with housing needs.
- o Support joint applications for funding and collaborative development efforts.

### **6. Monitor and Evaluate Progress**

- o Track changes in local policies and development outcomes to assess the impact of reform efforts.
- o Provide regular reporting to stakeholders and adjust strategies as needed to ensure continued progress toward housing affordability goals.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

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

Lake County will continue to address the obstacles to meeting the needs of the underserved communities. The application process prioritizes projects with high amounts of leverage and collaborative impact rather than duplicating services. The plan supports critical safety net programs outside of the CDG public services cap by investing in social services facilities improvements and affordable housing developments that help special needs populations.

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

Lake County will invest in improving the existing affordable housing stock and expand creation of new affordable housing units. Lake County partners with service providers with capacity to engage homeowners and provide cost-effective financial products to help households age in place. Lake County also partners with developers whose model leverages affordable capital to be able to pass on cost-savings into the production of affordable housing units.

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

Lake County shall continue to work with the Illinois Department of Public Health (IDPH) and its Childhood Lead Prevention Program to reduce lead-based paint hazards. Lake County will continue to utilize CDBG and HOME programs in response to lead-based paint contamination.

Lake County will continue to include lead-based paint evaluations in its existing housing programs; primarily as part of the Owner-Occupied Rehabilitation Program (OORP). The application process includes providing prospective clients a copy of the USEPA brochure, "The Lead-Safe Certified Guide to Renovate Right". Residences built prior to 1978 receive a lead-based paint inspection by a State of Illinois-certified professional. A report is prepared identifying the existence of and condition of any/all surfaces within the home containing lead-based paint. Applicants participating in the OORP receive a copy of the report. The OORP includes the remediation of LBP hazards by U.S. EPA certified contractors. All contractors must be certified lead renovators and the company must be registered as a firm by the U.S. EPA. A clearance report and LBP Free certificate is included in the required documentation for OORP households where LBP has been identified.

As per Federal Regulations found at 24 CFR Part 35, specific thresholds are followed to determine the protective hazard reduction requirement for each project that has been assisted with HOME and/or CDBG funding.

- Acquisition/Leasing - Visual Assessment
- Rehabilitation receiving up to and including \$5,000 per unit - Paint testing – Stabilization
- Rehabilitation receiving more than \$5,000 - \$25,000 per unit - Identify and address lead-based paint hazards - Implement interim controls.

- Rehabilitation receiving over \$25,000 - Identify and eliminate lead-based paint hazards. Full abatement of lead-based paint is required.

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

The general emphasis on housing is intended to have the long-term effect of alleviating poverty. By providing individuals with a decent, stable and well located home, individuals will be given essential tools they need to success. As noted in the plan, several initiatives are also planned to include job training programs. Each of these efforts is intended to improve the employment outlook for individuals.

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

Lake County Community Development continues to work with partner agencies to improve the connections between service providers which will serve to strengthen the existing system. The eviction prevention partnership between the Community Development and the Lake County Courts is a good example of the efforts being undertaken in the County to improve collaboration and systems improvement. Finally, Community Development continues to look for grant opportunities that will support systems changes that will increase collaboration and improve outcomes for Lake County residents.

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

Lake County continues to actively participate in Continuum of Care, Alliance for Human Services and Live Well Lake County efforts to bridge the available resources for Lake County residents.

### **Discussion**

Lake County plays a role in facilitating many local partnership. A pilot program was initiated by Wauconda School District 118, Catholic Charities and the Continuum of Care to provide services and rental subsidies to families in the district whoa reexperiencing homelessness or housing instability. The first two families in that pilot program obtained housing and remained in their home school area. Lake County is working to expand this program outside of District 118.

## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

#### Introduction

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

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

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	

#### Other CDBG Requirements

1. The amount of urgent need activities	0
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#### HOME Investment Partnership Program (HOME)

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

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

In addition to investing HOME Investment Partnership Program (HOME) funds in eligible activities as described in 24 CFR 92.205, Lake County invests other funding sources into housing activities. CDBG funds are often utilized for CDBG-eligible housing activities. Additionally, local Affordable Housing Program (AHP) funds are invested in housing activities to complement those funded by HOME and CDBG.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Lake County's Recapture and Resale Provisions document describe the conditions under which a homebuyer activity will be subject to either resale or recapture. Recapture provisions shall be enforced in cases where HOME funds are provided as a direct subsidy to the homebuyer as down payment and/or purchase- price assistance. Resale provisions shall be required when the HOME subsidy is provided in the form of a development subsidy in which HOME funds are divided among each HOME-assisted unit and not provided as a direct subsidy to the homebuyer. Resale provisions shall be encouraged when the HOME subsidy is provided in the form of a direct subsidy to the homebuyer and a Community Land Trust or other similar entity maintains ownership of the land associated with the HOME-assisted property to ensure its continued affordability, or it is determined that the property is located in a highly appreciating market for the purpose of maintaining the unit's affordability throughout the entire period of affordability.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Lake County's Recapture and Resale Provisions document ensures the affordability of units acquired with HOME funds. When resale provisions are applicable, the unit is sold to an income-eligible homebuyer and the period of affordability is completed by a second low-income beneficiary. When recapture provisions are applicable, the appropriate portion of funds are recaptured from the homebuyer and reinvested in an additional HOME-eligible activity, and the period of affordability is met by a second low-income beneficiary.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Lake County does not currently utilize HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

No TBRA activities are planned for PY25.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

No TBRA activities are planned for PY25.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

No preferences or limitations are planned for rental housing projects.

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

1. Include written standards for providing ESG assistance (may include as attachment)

Lake County's Written Standards for Provision of Emergency Solutions Grants (ESG) Assistance are attached.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Lake County Coalition for the Homeless, which serves as Lake County's Continuum of Care, has a Coordinated Entry system that meets HUD requirements for a coordinated assessment system. Individuals and families experiencing homelessness engage with the system at Entry Points, where they are assessed for the By-Name List and prioritized for housing resources. All beneficiaries are tracked through the centralized Homeless Management Information System database. The CoC reviews data on the System Performance Metrics to track the success of individual programs as well as the system as a whole and allocates funding to best address system needs.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

ESG funding is allocated through an annual application round. Community organizations are invited to submit applications for ESG-eligible activities, which are scored by Lake County staff according to a scoring matrix. Funding recommendations are discussed by the Public Services Advisory and Recommendation Committee, then passed on to the Housing and Community Development Commission for approval. These meetings are open to public comment. The Lake County Board ultimately approves the recommendations, and funds are distributed to the awardees.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

Not applicable; the jurisdiction is able to meet the homeless participation requirement in 24 CFR 576.405(a).

5. Describe performance standards for evaluating ESG.

ESG recipients are expected to abide by all ESG rules and requirements and provide high quality service. In order to ensure compliance, ESG recipients are monitored annually utilizing monitoring tools developed in accordance with HUD monitoring guidance. Monitoring includes a review of program documents, including program policies and participant files. Any deficiencies are addressed with the agency quickly.

DRAFT



## Appendix - Alternate/Local Data Sources

1	<b>Data Source Name</b> 2007-2011 American Community Survey
	<b>List the name of the organization or individual who originated the data set.</b> US Census Bureau
	<b>Provide a brief summary of the data set.</b> Household demographic survey sent to approximately 250,000 American households monthly.
	<b>What was the purpose for developing this data set?</b> Demographic research.
	<b>Provide the year (and optionally month, or month and day) for when the data was collected.</b> 2007-2011
	<b>Briefly describe the methodology for the data collection.</b> Household demographic survey sent to approximately 250,000 American households monthly.
	<b>Describe the total population from which the sample was taken.</b> United States
	<b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b> Household demographic survey sent to approximately 250,000 American households monthly.
2	<b>Data Source Name</b> LCHA Inventory
	<b>List the name of the organization or individual who originated the data set.</b> Lake County Housing Authority
	<b>Provide a brief summary of the data set.</b> Inventory data on public housing units and vouchers managed by housing authority.
	<b>What was the purpose for developing this data set?</b> Inventory management.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Covers LCHA only.

	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>Ongoing; latest version: 8/2014.</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete.</p>
<b>3</b>	<p><b>Data Source Name</b></p> <p>HMIS Inventory</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Lake County Community Development, HMIS Inventory</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Homeless Management Inventory System data - provides data on homeless persons and homeless facilities in a given locality.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Providing insight into homelessness</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Lake County</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>Ongoing; data in plan current as of 8/2014</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
<b>4</b>	<p><b>Data Source Name</b></p> <p>2000 Census</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>United States Census Bureau</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>The Census collects data on the characteristics of individuals, households, and housing units throughout the country.</p>
	<p><b>What was the purpose for developing this data set?</b></p>

	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2000</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p>
	<p><b>Describe the total population from which the sample was taken.</b></p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p>
5	<p><b>Data Source Name</b></p> <p>2009-2013 American Community Survey</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>United States Census Bureau</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>The American Community Survey (ACS) helps local officials, community leaders, and businesses understand the changes taking place in their communities. It is the premier source for detailed population and housing information about our nation.</p>
	<p><b>What was the purpose for developing this data set?</b></p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2009-2013</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>The data is collected through a long-form questionnaire and is sent to a small percentage of the population throughout the decade.</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>The population includes all states and the District of Columbia.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>Between 2009 and 2011, between 1,917,748 and 2,208,513 households were interviewed each year.</p>
6	<p><b>Data Source Name</b></p> <p>2000 Census (Manually Input)</p>

	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>The United States Census Bureau</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>The data set counts the number of people living in the United States.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>According to the Census Bureau, the purpose is to count every person living in the United States of America, and to use that count to determine representation in the Congress.</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>April 1, 2000</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>To count population, the Census Bureau uses a cohort component method to produce estimates. This is derived from a demographic balancing equation.</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>The total population includes all of the 50 states in the United States, the District of Columbia, and the U.S. territory of Puerto Rico.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>The national response rate was 67%. The demographics are as follows: 49.1% Male and 50.9% Female. 75.1% White, 12.3% Black or African American, .9% American Indian and Alaska Native, 3.6% Asian, .1% Native Hawaiian and Other Pacific Islander, 5.5% Some other race, 2.4% Two or more races.</p>
7	<p><b>Data Source Name</b></p> <p>EMSI Labor Market Analytics</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Lake County Partners</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>EMSI contains data from government sources like US Census Bureau and the Department of Labor plus data from job advertisements made by employers (aka real-time labor market data).</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Third party provider, Emsi, sells this data tool to clients like Lake County Partners.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Comprehensive</p>

	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2019-20</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
8	<p><b>Data Source Name</b></p> <p>ATTOM Data</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>ATTOM Data Solutions</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Assessor, Recorder, Foreclosure, Geocodes, Property Characteristics, Valuations, Ownership, Mortgage Loan, and Sales History data compiled in one data warehouse.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>From the ATTOM Website: ATTOM provides premium real estate data to power products that improve transparency, innovation, efficiency and disruption in a data-driven economy.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The ATTOM website indicates the data covers 99% of the U.S. population.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>N/A</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>In progress</p>



# Written Standards for Provision of Emergency Solutions Grants (ESG) Assistance

Last Revised May 2020

# Eligibility Evaluation Policy

*Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG.*

Each individual program is allowed to have general criteria by which they evaluate a potential participant's eligibility in an ESG-funded program. All such criteria must be reviewed and approved by the Homeless Assistance Application Review Committee of the Community Development Commission (CDC), and must contain the following:

- All program participants must have an initial consultation with a case manager or other authorized representative who can determine eligibility and the appropriate type of assistance needed.
- All program participants must have income at or below 30% of the Area Median Income (AMI). Income shall be determined on a prospective basis (not retrospective), and shall be certified using the Part 5 definition.
- A Staff Certification form must be completed with each eligibility evaluation.

For persons who are considered "literally homeless," no additional eligibility criteria are necessary. The documentation requirements for such persons are as follows:

- Written observation by the outreach worker; or
- Written referral by another housing or service provider (including HMIS recorded referral); or
- Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter.
- For individuals exiting an institution – one of the above forms of evidence and:
  - Discharge paperwork or written/oral referral, or
  - Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

For persons who are considered at "imminent risk of homelessness," the following documentation is required:

- A court order resulting from an eviction action notifying the individual or family that they must leave; or
- For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
- A documented and verified oral statement; and
  - Certification that no subsequent residence has been identified; and
  - Self-certification or other written documentation that the individual lacks the financial resources or support necessary to obtain permanent housing.

Finally, persons that are fleeing or attempting to flee domestic violence must have the following documentation:

- *For victim service providers:*
  - An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources to obtain safe and adequate housing on their own. Statement must be documented by a self-certification or a certification by an intake worker.

- *For non-victim service providers (i.e., agencies who do not exclusively serve DV victims):*
  - Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
  - Certification by the individual or head of household that no subsequent residence has been identified; and
  - Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Lake County does not intend to serve many persons considered homeless under other Federal statutes at this time; however, the following documentation is required:

- Certification by the organization that the individual or head of household seeking assistance met the criteria for homelessness under another federal statute; and
- Certification that the individual or head of household had no permanent housing in the last 60 days; and
- Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; and
- Documentation of special needs or at least two of the following barriers:
  - the lack of a high school degree or General Education Development (GED);
  - illiteracy;
  - low English proficiency;
  - a history of incarceration or detention for criminal activity;
  - a history of unstable employment

### ***“At Risk of Homelessness”***

For persons who are considered “at risk of homelessness,” the following criteria apply:

- Program participants must not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in the definition of homeless; and
  - Meets ONE of the following conditions:
    - Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
    - Is living in the home of another because of economic hardship;
    - Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
    - Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
    - Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
    - Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or



- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the Lake County Consolidated Plan;

For persons who are considered “at risk of homelessness,” the following documentation is required:

- A documented and verified oral statement from the program participant; and
- Certification that no subsequent residence has been identified; and
- Self-certification or other written documentation that the individual lacks the financial resources or support necessary to obtain permanent housing; and
- Written documentation that the individual meets one of the conditions listed

# Homeless Services Coordination Policy

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*Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.*

All ESG-funded programs must participate in the Lake County Homeless Management Information System (HMIS), commonly known as ServicePoint. Only programs that are specifically forbidden by other statutes or regulations (e.g., domestic violence victim service providers) may not participate. All HMIS-participating agencies must collect and maintain common data fields as determined by the HMIS Administrator and HMIS Committee, considering all relevant regulations. These common practices will be to ensure services are coordinated among organizations – one client, one record.

Lake County worked in concert with the Lake County Coalition for the Homeless, which serves as the Continuum of Care for IL-502 Waukegan/North Chicago/Lake County, to develop a robust system for Coordinated Entry that is tailored to the local need. Please reference the Lake County Coalition for the Homeless Coordinated Entry Policies and Procedures for more detail.

Finally, all ESG-funded programs must send a representative to the meetings of the Lake County Coalition for the Homeless. Participation in at least one committee is also required. Failure to attend may result in penalties on future applications.

# Prioritization Policies

*Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.*

## Homelessness Prevention

Any household that may otherwise be eligible for prevention assistance under ESG must also meet the “but for” rule – that is, “Would this individual or family be homeless but for this assistance?”

The “but for” rule can be documented with the following:

- Certification by the individual or head of household that no subsequent residence has been identified; and
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Furthermore, any household that qualifies for prevention assistance and meets the “but for” rule must also have the following qualifications:

- Have no more than three months of arrears; and
- Demonstrate an ability to sustain housing; and
- Demonstrate an ability to earn income; and
- Would remain in housing that is decent, safe, sanitary, and affordable.

If the household cannot meet the above qualifications, it is reasonable to infer that the household is in greater need than prevention assistance can provide for, and the household will be referred to a more appropriate program.

## Rapid Re-Housing

Programs funded to do rapid rehousing in Lake County must use an assessment that identifies barriers to obtaining and maintaining housing. Programs will select participants based on this assessment by prioritizing the population where a rapid rehousing intervention will be most effective. This population will have barriers to housing but not significant barriers. Programs will continue to assess the match between intervention and target population as data is available.

# Rent & Utility Cost Sharing Policy

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*Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.*

Each individual program is allowed to have general criteria by which they determine a program participant's share of rent and/or utilities in an ESG-funded program. All such criteria must be reviewed and approved by the Homeless Assistance Application Review Committee of the Community Development Commission (CDC).

Rapid rehousing programs will focus subsidies on providing just enough assistance to allow participants to maintain housing. Programs will use a declining subsidy model to allow participants to adjust to subsidy reductions over time. Participants will be better prepared to assume full responsibility for rent as program termination approaches.

# Length of Participation Policy – Financial Assistance

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*Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.*

Within homeless prevention programs, ESG funds will be limited to short-term rental assistance (up to three months) and payment of rental arrears (up to three months). Participants may only receive ESG prevention assistance once in a 24-month period.

Rapid rehousing programs will provide rental assistance for a maximum of thirteen months. In addition, payment of a full security deposit and up to three months of rental arrears will be allowed.

In cases where a rapid rehousing household experiences an adverse event and the household's case manager determines additional assistance is warranted, the limits on rental assistance are waived and support may be extended on a month by month basis. Extensions may be provided, so long as there is a demonstrated need, up to the regulatory maximum of 24 months. Any rental arrears provided count towards the 24-month maximum.

# Length of Participation Policy – Housing Stabilization and/or Relocation Services

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*Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receive assistance; or the maximum number of times the program participants may receive assistance.*

The amount and type of Housing Stabilization and/or Relocation Services to be provided to a particular program participant will be determined by the organization providing the assistance within the following parameters:

- Program staff will meet with participants at least once monthly for the duration of their program participation.
- Programs will conduct follow-up with participants, three and six months after they are exited from the program.
- In homeless prevention programs, the duration of such services shall not exceed six months.
- In rapid rehousing programs, services will not exceed sixteen months.
- In cases where a rapid rehousing household experiences an adverse event and the household's case manager determines additional assistance is warranted, the limits on services are waived and support may be extended on a month by month basis. Extensions may be provided, so long as there is a demonstrated need, up to the regulatory maximum of 24 months.
- In cases where a household, during the course of program participation, is determined to be a candidate for permanent supportive housing, the length of rental subsidy limits, declining subsidy model, and limits on services are waived and support may be provided up to the regulatory maximum of 24 months while a permanent supportive housing unit is pursued. The housing placement workgroup of the Lake County Coalition for the Homeless (serving as the Continuum of Care) must provide approval for any household to be granted this waiver.

# Performance Measures

*Performance measures for ESG projects were developed in consultation with the Continuum of Care to align with the strategies to end homelessness in Lake County, the existing reporting requirements of the CoC and the data available in the homeless management information system.*

Lake County developed the following performance measures, in consultation with the Continuum of Care, to help accomplish the following goals:

- Measure program performance
- Align program evaluation between ESG and the CoC
- Measure the County's progress toward homeless services goals as outlined in the Consolidated Plan, Annual Action plan and reported to HUD in the Consolidated Annual Performance and Evaluation Report (CAPER)

Participation in the Homeless Management Information System (HMIS) is required by ESG regulation for all projects receiving ESG funding. Therefore, all performance measures must be tracked in and run out of HMIS, locally known as ServicePoint.

The required ESG performance measures are as follows:

For all programs:

- Average length of stay
- Percentage of households with exits to permanent destinations
- Percentage of adult participants who maintain or increase their income

For Homeless Prevention Programs (except legal services) and Rapid Rehousing Programs:

- Percentage of households who remain in permanent housing six months after their exit from the program

# Lake County HOME Consortium: Recapture and Resale Provisions

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## *Resale and Recapture Policies*

These guidelines apply when a homebuyer or developer is assisted with HOME Investment Partnerships Program funds and the homebuyer sells or transfers the assisted property after the initial HOME-assisted purchase.

## *Period of Affordability*

Consistent with 24 CFR Part 92.254(a)(4), the following minimum period of affordability shall be enforced:

<u>HOME amount per unit</u>	<u>Minimum Period of Affordability</u>
Under \$15,000	5 years
\$15,000 to \$40,000	10 years
Over \$40,000	15 years

The Lake County Consortium may use HOME Program funds to provide homeownership assistance. The forms of subsidy to be used to assist homebuyers and/or developers include down payment assistance, interest subsidy, development cost subsidy, direct loan, project grant, or some combination of these methods. Lake County shall determine, based upon the type of subsidy, form of ownership, and type of market in which the property is located, whether the period of affordability shall be enforced by either Resale or Recapture provisions.

## *Resale Provisions*

- Activity Types - Resale provisions as outlined in 24 CFR Part 92.254(a)(5)(i)(A) and (B) shall be required or encouraged in the following cases:
  - Resale provisions shall be required when the HOME subsidy is provided in the form of a development subsidy in which HOME funds are divided among each HOME-assisted unit and not provided as a direct subsidy to the homebuyer.
  - Resale provisions shall be encouraged when the HOME subsidy is provided in the form of a direct subsidy to the homebuyer and a Community Land Trust or other similar entity maintains ownership of the land associated with the HOME-assisted property to ensure its continued affordability in perpetuity.
  - Resale provisions shall be encouraged when the HOME subsidy is provided in the form of a direct subsidy to the homebuyer and it is determined that the property is located in a highly appreciating market for the purpose of maintaining the unit's affordability throughout the entire period of affordability.
- Methods – The resale option ensures that the HOME-assisted unit remains affordable over the entire period of affordability. All HOME-assisted units shall meet the following criteria:
  - The new purchaser must be low-income, meeting the HOME Program definition, and within the same income limit as the original buyer. Additionally, the new purchaser must occupy the property as their principle residence.
  - To ensure that the sales price is affordable to a low-income homebuyer, the homebuyer may receive HOME Program direct assistance through a reduction in sales price, down payment assistance, or closing cost assistance. The additional HOME Program assistance may result in a longer Period of Affordability for the unit.
  - The sales price must be “affordable” to the new purchaser. In this instance, affordability for the new purchaser is a sales price that would require the new purchaser to pay no more 30% of their monthly



income on the fixed costs of homeownership (the loan principal, interest, taxes and insurance, or “PITI payment”).

- The maximum sale price shall be calculated using the following formula:

$$\begin{array}{r} \text{Down Payment} \\ \text{Loan Principal Paid} \\ \text{Current Loan Amount} \\ \text{Capital Improvement Value} \\ + \text{House Value Change, per HPI} \\ \hline \text{Maximum Sales Price} \end{array}$$

Down Payment: the financial contribution by the original homebuyer for their acquisition of the property, as evidenced on the HUD-1 or closing statement.

Loan Principal Paid: Payments made by the original homebuyer on their purchase money loan. This shall be calculated by the difference between the original loan amount at time of purchase (from the HUD-1 or closing statement or recorded loan document) and the loan amount at time of sale (from the loan payoff letter or other documentation from the lender).

Current Loan Amount: The amount of the purchase money loan at the time of sale (from the loan payoff letter or other documentation from the lender).

Capital Improvement: an investment by the original homebuyer into the house’s infrastructure such as the roof, heating system, or windows. Lake County shall use the actual cost of the Capital Improvement, not the increase in value to the house because of the Capital Improvement. For the cost of the Capital Improvement to be eligible the original homebuyer must show proof of payment. Capital Improvement shall not include routine maintenance to the house, such as painting.

House Value Change: The dollar value in the increase or decrease of the house as produced from the “Housing Price Index Calculator” at [www.FHFA.gov](http://www.FHFA.gov).

The house may be sold for less than the maximum sales price, so long as the sales price still meets the other requirements of this Resale Policy.

- The sales price must provide the original homebuyer, now the seller, a “fair return” on their investment (including any down payment, loan principal payments and capital improvement investment made by the owner since purchase). Fair return to seller shall be calculated using the following formula:

$$\begin{array}{r} \text{Down Payment} \\ \text{Capital Improvement Value} \\ \text{Loan Principal Paid} \\ + \text{House Value Change, per HPI} \\ \hline \text{Fair Return to Seller} \end{array}$$

Down Payment: as defined above.

Capital Improvement: as defined above.

Loan Principal Paid: as defined above.

House Value Change: as defined above.

NOTE: In a declining housing market the original homebuyer may not receive a return on their investment because the house will sell for less than or the same price as the original homebuyer's purchase price. Due to the declining market, this would be considered a fair return because the house values are depreciating rather than appreciating.

- Houses that are part of a community land trust shall follow a modified version of the maximum resale price formula:

$$\begin{array}{r} \text{Original Purchase Price} \\ \text{Homeowner share of appreciation} \\ + \text{Capital Improvement Value} \\ \hline \text{Fair Return to Seller} \end{array}$$

Original Purchase Price: The dollar value paid for the house as evidenced by the sales contract, HUD-1 or settlement statement.

Homeowner share of appreciation: The market appreciation of the house multiplied by the homeowner's investment ratio multiplied by 15%. The market appreciation shall be the difference in the value of the house as determined by an appraisal at the time of the homeowner's original purchase and at the time of sale; in a declining housing market, the market appreciation value may be negative. The homeowner's investment ratio shall be the ratio of the Original Purchase Price to the appraised value of the house at the time of original purchase.

Capital Improvement Value: as defined above.

The house may be sold for less than the maximum sales price, so long as the sales price still meets the other requirements of this Resale Policy.

Individual projects may apply for changes in the above formula for application to that specific project with the approval of Community Development Staff. The formula for "fair return" must be included in the contract between Lake County and the project partner.

- Enforcement Mechanisms - Resale requirements shall be enforced through deed restriction, covenant, land use restriction agreement, or other similar mechanism filed with the Lake County Recorder of Deeds and the requirements within shall be triggered upon sale or transfer of the HOME-assisted property.

### *Recapture Provisions*

- A. Activity Types - Recapture provisions as outlined in 24 CFR Part 92.254(a)(5)(ii)(A)(1) through (7) shall be enforced in cases where HOME funds are provided as a direct subsidy to the homebuyer as down payment and/or purchase-price assistance.
- B. Methods – The recapture option allows Lake County to recapture the entire HOME subsidy, subject to net proceeds if any, if the HOME recipient decides to sell the unit within the period of affordability at whatever price the market will bear. All HOME-assisted unit sales under the recapture option shall meet the following criteria:
  - The homebuyer may sell the property to any willing buyer.

- The sale of the property during the period of affordability triggers repayment of the direct HOME subsidy, subject to net proceeds if any, to Lake County that the buyer received when he/she originally purchased the home.

C. Enforcement Mechanisms - Recapture provisions shall be enforced through a mortgage, note and Recapture Agreement filed with the Lake County Recorder of Deeds, and the requirements within shall be triggered upon sale or transfer of the HOME-assisted property.

D. Amount of Repayment – Lake County requires that when the recapture requirement is triggered by a sale (whether voluntary or involuntary), it will recapture the HOME investment up to the total net proceeds remaining, if any, after the sale as modified by program specific choices under 24 CFR Part 92.254(a)(5)(ii)(A)(1) through (4). Net proceeds are the sales price minus the superior loan repayment (other than HOME funds) and any closing costs. In cases where the superior loan repayment and closing costs meet or exceed the sales price, net proceeds are zero. The specific method of recapture as capped by net proceeds, if any, is the following:

- Reduction during the affordability period - Reduce the HOME investment amount to be recaptured on a pro rata basis for the time the homeowner has owned and occupied the housing measured against the required affordability period.

Period of Affordability - Years	Period of Affordability - Months	Pro rata Monthly Reduction
5	60	1/60
10	120	1/120
15	180	1/180

E. Mortgage Release - Upon receipt of recaptured funds, Lake County shall file a “Release” document with the Lake County Recorder of Deeds to release the original HOME-assisted homebuyer from the requirements of the mortgage or other similar mechanism.

F. Repayments – Repayments of recaptured funds shall be remitted directly to Lake County to be utilized for HOME-eligible activities only.

### *Compliance*

- If the homebuyer is in noncompliance with the HOME Program requirements, the homebuyer shall repay the entire direct HOME Program subsidy to the Lake County Consortium within 90 days of notification of noncompliance. In the event of repayment due to noncompliance, the repayment amount is not subject to pro rata reduction over the period of affordability.
- Noncompliance with the HOME Program requirements includes: (1) failure to occupy the unit as the homebuyer’s principal place of residence, either by vacating or leasing the unit, throughout the entire Period of Affordability; (2) purposefully providing false information as to the homebuyer’s income or status as low-income; (3) failure to maintain the unit in accordance with all State and local housing quality standards or codes; (4) failure to comply with Lake County Consortium monitoring to determine compliance with the principal residency or property standards requirements; or (5) the sale or transfer of the unit without adherence to the resale/recapture provisions established in the mortgage, note, and homebuyer agreement.

# **Lake County HOME Homeownership Value Limits (95% Rule) Determination**

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## **Background**

According to 24 CFR 92.254, the participating jurisdiction may determine 95 percent of the median area purchase price for single family housing in the jurisdiction annually in lieu of the limits provided by HUD. The following information must be included in the annual action plan of the Consolidated Plan submitted to HUD for review and updated in each action plan.

## **Determined Limit**

The HOME Homeownership Value Limit for 2025 is \$433,200.00

## **Income Determination and Market Study Methodology**

The market analysis has been completed in accordance with the rules in 24 CFR 92.254(a)(2)(iii)(A)-€ to ensure that a sufficient number of recent housing sales are included in the survey.

- As there were over 500 sales, the market study covers a month reporting period, listed in ascending order of sales price.
- The street address of each property is included in the data.
- The attached market analysis includes all housing sales reported in the MLS database in Lake County for April 2025, ensuring that the sales data reflects all or nearly all of the one-family house sales in the entire participating jurisdiction.
- The total number of sales is odd, so the median sales price has been determined by taking the middle sale on the list and multiplying that sale price by 0.95.