



CITY OF JOLIET CDBG PUBLIC HEARING FOR THE FY 2016 ANNUAL ACTION PLAN

DATE: June 9, 2016

TIME: 3:00 pm

LOCATION: Planning Conf. Room, City Hall, 150 W. Jefferson Street, Joliet, IL 60432

CDBG PROGRAM REMARKS: Alfredo Melesio

Overview

- What is an Annual Action Plan?
- What is the process of preparing an Annual Action Plan?

Eligible CDBG Activities

CDBG funds may be used for activities which include, but are not limited to:

- acquisition of real property;
- relocation and demolition;
- rehabilitation of residential and non-residential structures;
- construction of public facilities and improvements, such as water and sewer facilities, streets, neighborhood centers, and the conversion of school buildings for eligible purposes;
- public services, within certain limits;
- activities relating to energy conservation and renewable energy resources; and
- provision of assistance to profit-motivated businesses to carry out economic development and job creation/retention activities.

Ineligible CDBG Activities

Generally, the following types of activities are ineligible:

- acquisition, construction, or reconstruction of buildings for the general conduct of government;

- political activities;
- certain income payments; and
- construction of new housing by units of general local government.

PUBLIC COMMENTS ON THE NEEDS OF THE CITY OF JOLIET

- Comments on needs or allocation priorities/requests

FY 2016 ANNUAL ACTION PLAN SCHEDULE: Alfredo Melesio

- **First Public Hearing:** Thursday, June 9, 2016 at 3:00 PM
- **FY 2016 Annual Action Plan goes on Display:** Friday, June 17, 2016
- **Second Public Hearing:** Tuesday, July 12, 2016
- **End of FY 2016 Annual Action Plan on Display:** Monday, July 18, 2016
- **City Council Adoption of the FY 2016 Annual Action Plan:** Tuesday, July 19, 2016
- **FY 2016 Annual Action Plan submitted to HUD Chicago Office:** Tuesday, August 2, 2016
- **Program Year Begins:** October 1, 2016

** All dates subject to change based off HUD allocations.*

City of Joliet anticipates it will receive the following Federal CDBG funds during the FY 2016 program year:

Entitlement Funds	Amount
FY 2016 CDBG Funds	\$ 869,630
CDBG Program Income	\$ 0
Total	\$ 869,630

REVIEW OF PAST PERFORMANCE: Alfredo Melesio

- Balance of funds available.
- Expenditure ratio.
- Benefit to low/mod income persons.

CLOSING REMARKS: Alfredo Melesio

ADJOURNMENT: Alfredo Melesio

Sign In Sheet - 6/9/2016

Candace Johnson

Sara Stovall

Ron Pullman

Samuel Knight

Martha Glas

Minutes:

One question on status of
Section 108 Loan. PP.

No other questions. No input.



**CITY OF JOLIET CDBG PUBLIC HEARING
FOR THE FY 2016 ANNUAL ACTION PLAN, SUBSTANTIAL
AMENDMENT TO THE FY 2015-2019 FIVE YEAR CONSOLIDATED
PLAN, AND CITIZEN PARTICIPATION PLAN UPDATE**

DATE: July 12, 2016

TIME: 6:00 PM

LOCATION: Planning Conf. Room, City Hall, 150 W. Jefferson Street, Joliet, IL 60432

CDBG PROGRAM REMARKS: Alfredo Melesio

Overview

- What is an Annual Action Plan, Consolidated Plan, and Citizen Participation Plan?

Eligible CDBG Activities

CDBG funds may be used for activities which include, but are not limited to:

- acquisition of real property;
- relocation and demolition;
- rehabilitation of residential and non-residential structures;
- construction of public facilities and improvements, such as water and sewer facilities, streets, neighborhood centers, and the conversion of school buildings for eligible purposes;
- public services, within certain limits;
- activities relating to energy conservation and renewable energy resources; and
- provision of assistance to profit-motivated businesses to carry out economic development and job creation/retention activities.

Ineligible CDBG Activities

Generally, the following types of activities are ineligible:

- acquisition, construction, or reconstruction of buildings for the general conduct of government;
- political activities;
- certain income payments; and

- construction of new housing by units of general local government.

FY 2016 ANNUAL ACTION PLAN SCHEDULE: Alfredo Melesio

The City will receive an allocation of \$869,630 in FY 2016 CDBG funds and \$350,353 in FY 2016 HOME Investment Partnership funds through the Will County HOME Consortium later this year following HUD approval of the Plans. The draft reports are available in the City Clerk's Office, Joliet Libraries and online at www.cityofjoliet.info.

The following advertised CDBG activities are proposed for funding under the FY 2016 Annual Action Plan:

• Public Facilities - Non-Profit Agencies	\$ 150,000
• Public Improvements (Streets)	\$ 279,630
• Emergency Home Repairs	\$ 100,000
• Evergreen Terrace Redevelopment	\$ 90,000
• Demolition/ Clearance	\$ 100,000
• General Administration/Planning	\$ 150,000

Total FY 2016 CDBG Funds for Project Activities = \$ 869,630

For FY 2016, the HOME funds the City receives will be administered through Will County's HOME Consortium. The following HOME activities (City of Joliet only) are proposed for funding under Will County's FY 2016 Annual Action Plan:

• New Housing Construction	\$ 227,289
• Downpayment Assistance	\$ 45,511
• CHDO Set-Aside: Project TBD	\$ 52,553
• HOME Administration	\$ 25,000

Total FY 2016 HOME Funds for Project Activities = \$ 350,353

PUBLIC COMMENTS ON DRAFT PLANS

- Comments on draft FY 2016 Annual Action Plan, FY 2015-2019 Consolidated Plan Amendment, and Citizen Participation Plan Update

CLOSING REMARKS: Alfredo Melesio

ADJOURNMENT: Alfredo Melesio

Sign in Sheet 7/12/16

BARRY KOLANOWSKI, Senior Services

Community Development Block Grant FY2016 Annual Action Plan

Senior Services of Will County is interested in partnering with the City of Joliet to provide assistance to those over age 60 in the form of Emergency Home Repairs.

SENIOR SERVICES OF WILL COUNTY is a trusted name serving Joliet and Will County for over 50 years by providing older Americans and the disabled over age 18 with case management, education, connection to resources and programs to support a life of self-sufficiency.

Will County is the home to nearly 80,000 persons over the age of 65, which according to current growth rates will exceed 100,000 within the next 3-4 years.

- 28% of these seniors live alone in their own residence
- According to the commission on Affordable Housing and Health Facilities, 2.7% of those homes are identified as having moderate to severe maintenance needs

Seniors are reluctant or unable to employ repair assistance:

- Exists a heightened anxiety about trusting a stranger in their house
- Fear of price gouging
- Shoddy workmanship
- Risk of theft
- Repair scams
- High cost of repairs are unaffordable

So a senior may remain in an unsafe or unhealthy home environment to avoid the risk.

SAFE AT HOME, is a program that is an outgrowth of our Community Connection Collaborative which is funded in part by the Illinois Department on Aging, Northeastern Illinois Area Agency on Aging, First Midwest Community Investment Grant and the United Way of Will County. We also have grant applications pending with the Community Foundation of Will County and the Retirement Research Foundation so we can expand our services.

Senior Services of Will County would propose the opportunity to serve the older population of Joliet with financial assistance through the CDBG Emergency Home Repair funds.

As a Federally funded and State funded agency we are very familiar with the necessary administrative responsibilities to remain in compliance. In 2015, we engaged 18,000

seniors through our programs providing a well-established pipeline to administer the program.

We are also partnering with various third-party vendors for work on projects beyond the skills and scope of our program but here is a snapshot of typical maintenance services we expect to provide directly. We understand that under the terms of the CDBG Funds this list may be amended for qualifying purposes:

- Appliance installs
- Bathroom Repairs
- Blind repair and install
- Assemble Bookcases
- Packing
- Caulking
- Cement patching
- Ceiling leaks
- Counter tops
- Curtains
- Dimmer switches
- Downspouts/gutters
- Dryer vents
- Drywall repair
- Faucet install/repair
- Fence & gates
- Filters
- Flood lights
- Flooring: hardwood, vinyl, tile
- Flower boxes
- Furniture Moving
- Garbage disposal
- Grouting
- Hand rails
- Hanging items
- Landscaping
- Light fixtures
- Locks
- Mailboxes
- Painting
- Paneling
- Screens
- Shelving
- Shutters
- Sinks
- Smoke detectors
- Phone & TV cabling
- Storage sheds
- Storm windows
- Sweeping & cleaning
- Towel racks
- Weather stripping
- Window repairs
- Specific Yard Projects

Thank you for your consideration.

Sincerely,



Barry Kolanowski

Executive Director, Senior Services of Will County, 251 N. Center Street, Joliet,

IL 60435 PHONE: 815-723-9713 FAX: 815-740-4218

bkolanowski@agingspecialists.org www.willcountyseniors.org

Melesio, Alfredo

From: Melesio, Alfredo
Sent: Monday, July 18, 2016 9:38 AM
To: Barry Kolanowski (bkolanowski@agingspecialists.org)
Subject: Action Plan Hearing Comment Response

Mr. Kolanowski,

Thank you for attending the Action Plan hearing and providing written comments on the Action Plan. As we discussed at the hearing there are several ways we can partner together to help local seniors. We look forward to being your partner on this project. Thanks.

Alfredo Melesio Jr. AICP

Director of Neighborhood Services Division

150 W. Jefferson St., Joliet, IL 60432

Office: 815-724-4100 Personal Cell: 815-715-2878 Fax: 815-724-4118

Email: amelesio@jolietcity.org File a complaint online by clicking [here](#)

Did you hear about [Joliet's Downpayment Assistance Program](#)?

Have you signed up for our landlord conference? www.jolietlandlords.com



18220 Harwood Avenue • Suite 1 • Homewood, IL 60430 • (708) 957-4674 • Fax (708) 957-4761

JOHN R. PETRUSZAK
Executive Director

www.southsuburbanhousingcenter.org

July 18, 2016

South Suburban Housing Center's Comments

on

City of Joliet's FY 2016 Annual Action Plan for the use of Community Development Block Grant (CDBG) Program Entitlement Funds, substantial amendments to the City of Joliet's FY 2015-2019 Five Year Consolidated Plan for the use of Community Development Block Grant (CDBG) and HOME Investment Partnership Grant (HOME) funds, and updated City's Citizen Participation Plan

South Suburban Housing Center (SSHC), is the private, non-profit, regional fair housing and housing counseling agency primarily serving over 100 communities in southern Cook, Will and Kankakee counties of Illinois since 1975. SSHC's Fair Housing Enforcement Services extend to Grundy and Iroquois Counties, Lake County, Indiana and several central Illinois cities. SSHC is a HUD-recognized Qualified Fair Housing Organization. SSHC's current Fair Housing Enforcement and Housing Counseling programs assist individuals in all protected classes and ensure that housing providers recognize and comply with the fair housing laws.

The City of Joliet's (City) last Analysis of Impediments to Fair Housing prepared in 2014, in conjunction with their Consolidated Plan, produced a Fair Housing Action Plan that made the following recommendations to address recognized impediments to fair housing:

- The City should conduct a more in-depth analysis of HMDA data.
- Continue to budget CDBG funds and otherwise support the efforts of local and regional fair housing advocacy organizations in undertaking paired real estate testing, both for rental and sales housing.
- Enlist the support of local and regional fair housing advocacy organizations in providing testing results and tracking complaints by basis of discrimination; effectuate a fair housing outreach and training strategy that is aimed at the most significant need.
- The City should engage in a communication campaign that markets home ownership opportunities to all minorities, regardless of income, including middle and higher income minorities.

These same Fair Housing Action Plan recommendations were utilized for the anticipated scope of work of a Request for Proposal released by the City in the summer of 2014. SSHC prepared and submitted a timely response in July 2014, outlining fair housing enforcement, and education and outreach activities,

it was prepared to implement to address the recommendations. After the submission deadline, the City recognized that SSHC's proposal had been the only response to the RFP received and that it was being given serious consideration. Subsequently, SSHC agreed to participate in the community input session held at Joliet City Hall on July 16, 2014, with the City's Consolidated Plan consultants, Urban Design Ventures. At this meeting SSHC's Executive Director reiterated the need for the City to implement activities identified in the recent RFP to begin to address the City's recognized fair housing impediments. While these comments seemed to be well received by the City's representative and UDV consultants present, to date, SSHC's proposal to provide fair housing services has received no further action. Furthermore, SSHC is not aware of any other qualified fair housing organization, or efforts by the City itself, to provide CDBG or other resources to implement the corrective actions identified in its own Fair Housing Action Plan.

Given this recent example, and history of the City's lack of attention to fair housing impediments, SSHC is concerned with the draft FY 2016 Annual Action Plan, amendments to the FY 2015-2019 Consolidated Plan and Citizen Participation Plan that appears to continue a pattern of ignoring the City's responsibilities under the Fair Housing Act in receiving federal CDBG, housing and other development funds. This draft Annual and Con Plan amendment document's only mention of fair housing is to generically state as a housing priority, to "promote fair housing choice through education and outreach in the community." The proposed amendment fails to make a budget allocation to implement this "priority." The needs of the City, to implement activities to Affirmatively Further Fair Housing, have not changed.

Respectfully submitted,



John R. Petruszak
Executive Director
South Suburban Housing Center

Melesio, Alfredo

From: Melesio, Alfredo
Sent: Tuesday, July 19, 2016 11:27 AM
To: 'JOHN PETRUSZAK'
Cc: Maury McGough
Subject: RE: SSHC Written Response to Notice of Public Hearing CDBG FY2016 and CPP Update

Mr. Petruszak,

Thanks for providing comments. We appreciate the work of your agency and assistance in the past. The Mayor and City Council of the City of Joliet are considering approving the CDBG FY 2016 and CPP Update this evening. We disagree with your assertion that there is a recent “example, and history” of inattention to fair housing impediments. Actually, in 2012 the SSHC was the agency that declined to help the City with its Fair Housing Action Plan.

In the past year the City of Joliet has:

- Attended a Fair Housing Seminar on Rental Registration Programs
- Conducted a Landlord Conference that included Fair Housing Topics and discussed recent HUD guidance on criminal background checks. (400 attendees)
- Hosted a Homebuyer Expo attended by 158 families with Housing Counselors, REALTORS and Lenders. (including SSHC)
- Committed \$650,000 in down payment assistance in an effort to support fair housing.
- Committed \$3.3 million for the acquisition of Evergreen Terrace in an effort to support fair housing.

These are just a few recent examples.

Now, as a community with a commitment to Fair Housing we want SSHC to understand that we have set-aside \$150,000 in our Action Plan for General Administrative expenses. The current Action Plan, and HUD guidelines, allows for the use of general administrative funds for Fair Housing Activities. The City of Joliet is eager to discuss the possibility of contracting with your agency for services that we feel will only compliments the City’s recent examples and historical commitment to fair housing. Let’s set a time to discuss. Thanks.

Alfredo Melesio

From: JOHN PETRUSZAK [<mailto:southsuburban@prodigy.net>]
Sent: Monday, July 18, 2016 6:32 PM
To: Melesio, Alfredo
Cc: Maury McGough
Subject: Re: SSHC Written Response to Notice of Public Hearing CDBG FY2016 and CPP Update

TO: Alfredo Melesio Jr. AICP

Director of Neighborhood Services Division
City of Joliet

Attached please find SSHC's written comments to the City's Notice of Public Hearing on CDBG FY2016 and CPP Update.

*John R. Petruszak
Executive Director
South Suburban Housing Center
18220 Harwood Avenue, Suite 1
Homewood, Illinois 60430
(708) 957-4674, x 22
(708) 957-4761 fax*

From: "Melesio, Alfredo" <amelesio@jolietcity.org>
To:
Sent: Thursday, June 23, 2016 6:04 PM
Subject: Notice of Public Hearing CDBG FY2016 and CPP Update

Good Evening,
Please see attached NOTICE OF A PUBLIC HEARING. Please let me know if you have any questions. Thanks.

Alfredo Melesio Jr. AICP
Director of Neighborhood Services Division
150 W. Jefferson St., Joliet, IL 60432
Office: 815-724-4100 Personal Cell: 815-715-2878 Fax: 815-724-4118
Email: amelesio@jolietcity.org File a complaint online by clicking [here](#)
Did you hear about [Joliet's Downpayment Assistance Program](#)?
Have you signed up for our landlord conference? www.jolietlandlords.com

July 19, 2016

Alfredo Melesio, Director
City of Joliet Neighborhood Services Division
150 W. Jefferson Street
First Floor, South Wing
Joliet, IL 60432

RE: **Comments by the Shriver Center and CAFHA on the City of Joliet's FY 2016 Annual Action Plan and FY 2015-19 Amended Five-Year Consolidated Plan City of Joliet, Illinois**

Dear Mr. Melesio:

The Sargent Shriver National Center on Poverty Law (“Shriver Center”) provides national leadership to promote justice and improve the lives and opportunities of people with low incomes. The Shriver Center advances laws and policies through litigation, legislative and policy advocacy, and administrative reform, to achieve economic, racial, and social justice for our clients. The Shriver Center’s Housing Unit is committed to advancing civil rights through litigation, administrative reform, and policy advocacy.

The Chicago Area Fair Housing Alliance (“CAFHA”) is a 501 (c) (3) non-profit consortium of fair housing and advocacy organizations, government agencies, and municipalities committed to the value of fair housing, diversity, and integration. CAFHA works to combat housing discrimination and promote integrated communities of opportunity through education, advocacy, and collaborative action.

As you know, the City of Joliet has a long and controversial history in terms of its compliance with and commitment to civil rights laws. The City’s actions, including its support for the local housing authority, have resulted in a net loss of affordable housing in the City of Joliet. These actions have adversely impacted African-Americans in Joliet, who have a disproportionate need for affordable housing.

Failure to Address Impediments Identified in 2014 Fair Housing Action Plan

In recognition of those impediments, the City produced a Fair Housing Action Plan in 2014 to address certain impediments to fair housing:

- The City should conduct a more in depth analysis of HMDA data;
- The City should continue to budget CDBG funds and otherwise support the efforts of local and regional fair housing organizations in undertaking pair real estate testing, both for rental and sales housing;

- The City should enlist the support of local and regional fair housing advocacy organizations in providing testing results and tracking complaints by basis of discrimination; effectuating a fair housing outreach and training strategy that is aimed at the most significant need;
- The City should engage in a communications campaign that markets home ownership opportunities to all minorities, regardless of income, including middle and higher income minorities.

These same Fair Housing Action Plan recommendations were utilized for the anticipated scope of work of a Request for Proposals (“RFP”) released by the City in the summer of 2014. The South Suburban Housing Center is a HUD-recognized Qualified Fair Housing Organization serving Will County and submitted a proposal in response to the RFP. In spite of being the only applicant, South Suburban’s proposal to provide fair housing services has not been granted. Indeed, apparently no fair housing organization or even the City itself, have taken steps with the help of CDBG funds or other resources to implement the corrective actions identified in its own Fair Housing Action Plan.

Given this lack of effort to address fair housing impediments identified by the City and even those that have not been identified by the City, the Shriver Center and CAFHA are concerned with the draft FY 2016 Annual Action Plan and the amendments to the FY 2015-2019 Consolidated Plan and Citizen Participation Plan that appears to continue a pattern of ignoring the City’s responsibilities under the Fair Housing Act and specifically, the Housing and Community Development Act of 1974 in receiving entitlement funds. That this draft Annual and Con Plan amendment document’s only mention of fair housing is to generically state as a housing priority, to “promote fair housing choice through education and outreach in the community” falls far short of its obligations when in receipt of those funds. Moreover, there is no budget allocation to even implement this so-called priority. These drafts show that the City has no intention of actually affirmatively furthering fair housing.

Failure to Address Other Impediments to Fair Housing Choice Not Identified By The City

As part of its Housing Market Analysis section of the FY 2015-19 Consolidated Plan, the City of Joliet has also failed to account for how its ordinances, policies, and practices have harmed protected classes, particularly for those individual who rent, live in, or are eligible for public and subsidized housing. As well, the Housing Market Analysis makes no attempt to identify if households with multiple housing problems are disproportionately minority.

Demographic data establishes that a disproportionate number of African-American households are among the very- and extremely-low income Joliet households experiencing a need for affordable rental housing. 42.4% of Joliet’s African-American households had an annual income of less than \$35,000 in 2014.¹ In contrast, only 21.2% of Joliet’s non-Hispanic White population

¹ U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates (Table B19001B). \$35,000 is slightly less than 50% AMI for the Chicago-Joliet-Naperville, IL HUD Metro FMR Area, according to 2016 figures from HUD. See “FY 2016 Income Limits Summary”, available at https://www.huduser.gov/portal/datasets/il/il2016/2016summary.odn?states=%24states%24&data=2016&inputname=METRO16980M16980*Chicago-Joliet-

had an annual income of less than \$35,000.² Furthermore, African-American households in Joliet are disproportionately renters—in 2014, 61.0% of African American households in Joliet rented, compared with only 17.8% of non-Hispanic White households and 28.5% overall.³

According to data from 2010-2014, 62.9% of Joliet renter households with an annual income of less than \$35,000 paid more than 35% of their income toward rent.⁴ Joliet's 2015-2019 Consolidated Plan also shows that African-American households were much more likely than non-Hispanic White renters to be severely cost burdened. Approximately 26.1% of African-American households paid more than 50% of their income toward housing costs, compared with only 11.0% of non-Hispanic White households.⁵ 76% of current Housing Authority of Joliet Public Housing residents are African-American, as are 84% of households participating in the Housing Choice Voucher program.⁶ According to Joliet's 2010-2014 Consolidated Plan, African-American households made up 86% of the Housing Authority of Joliet's Public Housing waiting list and 85% of the Housing Authority of Joliet's Housing Choice Voucher waitlist.⁷

The Housing Market Analysis should have acknowledged the increasing loss of affordable housing in Joliet and its adverse impact on racial minorities, due to the actions, policies, and practices of the City. The City's exercise of its power of eminent domain of Evergreen Terrace, where up to 241 households will be moved to Housing Choice Vouchers, will result in a net loss of site-based affordable housing in the City, in spite of 900 households currently on the Evergreen Terrace waitlist. This loss is coupled with the City's longstanding support for the demolition of its remaining family public housing developments, where the failure to replace all of those units again adversely harms racial minorities.

The Housing Market Analysis should have also acknowledged the City's crime-free housing and nuisance ordinances and their adverse impact on protected classes, including victims of domestic violence, racial minorities, and persons with disabilities. In spite of being notified in September of 2015 that the City's ordinance was out of compliance with P.A. 99-441, which bars local governments from enacting or enforcing ordinances that penalize victims of domestic violence or sexual assault or persons with disabilities from calling the police or for (for survivors of violence) acts of violence committed against them, the City has made no effort to change its laws. On information and belief, the City continues to use "two or more calls for police service" as the trigger for enforcement of its crime-free and nuisance ordinance, which likely runs afoul

Naperville%2C+IL+HUD+Metro+FMR+Area&stname=%24stname%24&statefp=99&year=2016&selection_type=hmf

² U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates (Table B19001H).

³ U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates (Tables B25003, B25003H, B25003B)

⁴ U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates (Table B25074). This is well in excess of the generally accepted definition of affordability, which is for a household to pay no more than 30% of its annual income on housing.

⁵ City of Joliet, 2015-2019 Consolidated Plan (2015) available at: <http://www.cityofjoliet.info/home/showdocument?id=4498>

⁶ U.S Department of Housing and Urban Development, Picture of Subsidized Households – Housing Authority of Joliet (2016) available at <https://www.huduser.gov/portal/datasets/picture/yearlydata.html>

⁷ There is no breakdown of households on the HAJ waitlist by race in the more recent 2015-2019 Consolidated Plan. City of Joliet, 2010-2014 Consolidated Plan (2010) available at: <http://www.cityofjoliet.info/home/showdocument?id=1729>

of the new state law and create an adverse disparate impact on protected classes. We understand that the City is also continuing to use arrest data as a basis for enforcement, which may run afoul of the new notice from HUD on the civil rights implications concerning use of criminal records.⁸ Given the disproportionate reliance on rental housing by racial minorities in Joliet, the City should also be concerned that its enforcement of these laws violate its duty not to discriminate under the Fair Housing Act and its duty to affirmatively further fair housing under the Housing and Community Development Act of 1974.

Failure to Address Racially/Ethnically-Concentrated Areas of Poverty In And Around The City

There are multiple Racially/Ethnically Concentrated Areas of Poverty (“R/ECAPs”) in and around the City of Joliet. The City of has failed to address regional or local strategies for improving access to opportunity for residents of R/ECAPs in its FY 2015-19 Consolidated Plan. With this in mind, it is important that the City assess local and regional R/ECAPS and begin identifying solutions to disinvestment in such communities. An assessment should include, but need not be limited to identifying:

- Who lives in these areas?
- What is the current housing structure?
- What are the currently unfulfilled needs of R/ECAP residents (i.e. access to employment opportunities, transportation, social services, green space, etc.)?
- What resources already exist within the R/ECAP?
- What resources can be leveraged in the surrounding communities?
- What is the risk of gentrification and displacement?

R/ECAPs should receive priority consideration for public investment and it is essential that regional approach to disinvested communities is developed. There is a need to promote a greater income mix within the R/ECAP areas, and other disinvested communities, through development and improvement of existing infrastructure while simultaneously opening up the housing market in non-R/ECAPs. However, it is critical to ensure that development plans do not simply lead to a top-down gentrification of disinvested communities and displacement and resegregation of residents elsewhere—residents and their insights must serve an integral role in the development process.

Sincerely,

Katherine E. Walz
Director of Housing Justice
Director of Litigation
Shriver Center

Patricia Fron
Executive Director
CAFHA

⁸ U.S. Department of Housing and Urban Development, Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions (April 4, 2016).

COMMUNITY DEVELOPMENT
NEIGHBORHOOD SERVICES DIVISION
ALFREDO MELESIO, DIRECTOR
(815) 724-4100
(815) 724-4118 Fax
amelesio@jolietycity.org



150 WEST JEFFERSON STREET
JOLIET, ILLINOIS 60432-4158

July 27, 2016

Katherine E. Walz
Director of Housing Justice
Director of Litigation
Shriver Center

Patricia Fron
Executive Director
CAFHA

Dear Ms. Walz and Ms. Fron:

This letter is written in response to your letter dated July 19, 2016. Your letter was received on the last day of the 30-day public comment period on the City's proposed FY 2016 Annual Action Plan and amended Five Year Consolidated Plan. My Department has not previously received correspondence or communication from your office on our previous plans. Instead of waiting until the last day, if you are interested in improving the housing conditions in the City of Joliet and working with the City to affirmatively further fair housing, it would be appreciated if you had contacted us earlier.

It should be noted that the City is amending its FY 2015-2019 Consolidated Plan to join the County in their HOME Consortium. A number of sections of the Plan that were on display over a year ago remain unchanged and continue to be the basis that the City uses to allocate CDBG and HOME funds. I can provide you a copy of the original Plan to review the areas that were not part of HUD requirement for plan submission but were included in the original Plan.

Your statement that, "*As you know, the City of Joliet has a long and controversial history in terms of its compliance with and commitment to civil rights laws. The City's actions, including its support for the local housing authority, have resulted in a net loss of affordable housing in the City of Joliet. These actions have adversely impacted African-Americans in Joliet, who have a disproportionate need for affordable housing.*" is unfounded and inflammatory. If the Shriver Center and CAFHA are truly interested in working with the City of Joliet to affirmatively further fair housing, this confrontational statement is not a positive approach.

Your letter accuses the City of failing to affirmatively further fair housing. That is a conspicuously false statement. In the previous few years, the City has hosted multiple fair housing conferences to educate all real estate participants on housing rights and responsibilities, performed numerous community outreach efforts to better understand the needs of LMI and protected classes of individuals, provided financial assistance to first-time homebuyers, and assisted affordable housing developers with funding for new home construction. The City's financial support of the City of Joliet Housing Authority has resulted in a net gain of 13 affordable housing units throughout the City, as well as deconcentrated racially/ethnically impacted areas of poverty. In fact, when you compare the number of affordable housing units available in 2010 versus 2016, there has been a net gain of 190 affordable housing voucher units, and which are scattered throughout the City in a number of economically, racially, and ethnically diverse neighborhoods. The City has also had a net increase of 1,294 rental units from 2010 to 2014.

The FY 2014 Annual Action Plan provided an update to the City's 2011 Analysis of Impediments to Fair Housing Choice that was submitted and approved by HUD in January 2014. The City has been addressing the impediments identified in the 2014 update; in particular:

- *The City should conduct a more in depth analysis of HMDA data;*

The City has conducted an in depth analysis of HMDA data. The HMDA data analysis corroborates the housing market analysis in the FY 2015-2019 Consolidated Plan and was an important statistic in identifying the City's community, economic, and housing needs and in determining the City's Five Year goals and priorities. The City acknowledges and is aware that minorities are disproportionately affected by housing problems and patterns of discrimination as shown in HMDA data.

In response to these issues, the City has directed CDBG and HOME funding to address these problems. Under the FY 2016 CDBG Program, the City will receive a grant in the amount of \$869,630. The City will budget \$150,000 for general administration which will include Fair Housing Activities. The balance of funds (\$719,630) will be allocated to activities which principally benefit low- and moderate-income persons in the amount of \$619,630 (86%) and \$100,000 for the removal of slums and blight (14%). The activities which principally benefit low- and moderate-income persons are divided between Public Facilities activities \$429,630 (69%) and Housing activities \$190,000 (31%). Almost 100% of previous years CDBG funds are allocated to affordable housing activities that will allow greater access to affordable housing choices for LMI City residents. In particular, residents that are members of a protected class will be assisted with the CDBG and HOME funds.

- *The City should continue to budget CDBG funds and otherwise support the efforts of local and regional fair housing organizations in undertaking pair real estate testing, both for rental and sales housing; and*

The City should enlist the support of local and regional fair housing advocacy organizations in providing testing results and tracking complaints by basis of discrimination; effectuating a fair housing outreach and training strategy that is aimed at the most significant need;

As stated above, the City has allocated \$150,000 of its FY 2016 CDBG allocation to Program administration which includes funding for fair housing activities. In response to a public comment letter from SSHC, I have offered to meet and discuss possible fair housing activities with SSHC at a time to be scheduled in the near future. Please, allow me to extend the invitation to you, as well. The City is very happy to meet with you to discuss your concerns and suggestions.

- *The City should engage in a communications campaign that markets home ownership opportunities to all minorities, regardless of income, including middle and higher income minorities.*

The City has been actively communicating its many home ownership opportunities to all minorities, regardless of income, including middle and higher income minorities. The City has organized a Homebuyer Expo marketed digitally at major and ethnic grocers, and facebook, in cooperation with local banks. This included a bus tour of local houses for sale.

In your letter you stated:

The Housing Market Analysis should have acknowledged the increasing loss of affordable housing in Joliet and its adverse impact on racial minorities, due to the actions, policies, and practices of the City. The City's exercise of its power of eminent domain of Evergreen Terrace, where up to 241 households will be moved to Housing Choice Vouchers, will result in a net loss of site-based affordable housing in the City, in spite of 900 households currently on the Evergreen Terrace waitlist. This loss is coupled with the City's longstanding support for the demolition of its remaining family public housing developments, where the failure to replace all of those units again adversely harms racial minorities.

There have been no decisions to reduce the number of units at Evergreen Terrace. On multiple occasions the City of Joliet has made it clear that the Housing Authority of Joliet is a separate legal entity and while the City supports the redevelopment plans of the Housing Authority; the Housing Authority is an autonomous and independent entity. The decision to raze dilapidated, uninhabitable, and obsolete housing in a racially/ethnically-concentrated areas of poverty throughout the City has been at the discretion of the U.S. Department of Housing and Urban Development. It should also be noted that the Housing Authority has not failed to redevelop on the former Poole Gardens public housing site and has replaced over 100% of the units. The displaced housing goal for the Housing Authority of Joliet has been and continues to be, one for one replacement. While it may be the position of your organization to concentrate LMI families in public housing units, it is the position of many affordable housing advocates, including the Housing Authority of Joliet and the City of Joliet to offer LMI families the opportunity to choose what neighborhood they choose to live in, while still receiving a housing subsidy for living in an area of their choice. We believe that racially, ethnically, and economically diversified neighborhoods are the healthiest neighborhoods for households to live, thrive, and grow in; and the City will continue to allocate funds to this vision.

In your letter you stated:

The Housing Market Analysis should have also acknowledged the City's crime-free housing and nuisance ordinances and their adverse impact on protected classes, including victims of domestic violence, racial minorities, and persons with disabilities. In spite of being notified in September of 2015 that the City's ordinance was out of compliance with P.A. 99-441, which bars local governments from enacting or enforcing ordinances that penalize victims of domestic violence or sexual assault or persons with disabilities from calling the police or for (for survivors of violence) acts of violence committed against them, the City has made no effort to change its laws. On information and belief, the City continues to use "two or more calls for police service" as the trigger for enforcement of its crime-free and nuisance ordinance, which likely runs afoul of the new state law and create an adverse disparate impact on protected classes. We understand that the City is also continuing to use arrest data as a basis for enforcement, which may run afoul of the new notice from HUD on the civil rights implications concerning use of criminal records. Given the disproportionate reliance on rental housing by racial minorities in Joliet, the City should also be concerned that its enforcement of these laws violate its duty not to discriminate under the Fair

Housing Act and its duty to affirmatively further fair housing under the Housing and Community Development Act of 1974.

Please be advised that Chapter 20 of Joliet Code of Ordinances has been revised, and will continue to be, pursuant to your September 16, 2015 letter that was addressed to the City. Section 8 is currently not being enforced with respect to the exceptions as set forth in your correspondence; the City is in the process of codifying the exception at an upcoming meeting.

In your letter you stated:

There are multiple Racially/Ethnicly Concentrated Areas of Poverty ("R/ECAPs") in and around the City of Joliet. The City of has failed to address regional or local strategies for improving access to opportunity for residents of R/ECAPs in its FY 2015-19 Consolidated Plan. With this in mind, it is important that the City assess local and regional R/ECAPS and begin identifying solutions to disinvestment in such communities. An assessment should include, but need not be limited to identifying:

- *Who lives in these areas?*
- *What is the current housing structure?*
- *What are the currently unfulfilled needs of R/ECAP residents (i.e. access to employment opportunities, transportation, social services, green space, etc.)?*
- *What resources already exist within the R/ECAP?*
- *What resources can be leveraged in the surrounding communities?*
- *What is the risk of gentrification and displacement?*

R/ECAPs should receive priority consideration for public investment and it is essential that regional approach to disinvested communities is developed. There is a need to promote a greater income mix within the R/ECAP areas, and other disinvested communities, through development and improvement of existing infrastructure while simultaneously opening up the housing market in non-R/ECAPs. However, it is critical to ensure that development plans do not simply lead to a top-down gentrification of disinvested communities and displacement and resegregation of residents elsewhere—residents and their insights must serve an integral role in the development process.

Through data analysis performed for the FY 2015-2019 Consolidated Plan, the City identified the demographic and economic composition of the City's R/ECAP areas to make financial sound and economically efficient assistance decisions. The City of Joliet is currently in the process of committing \$617,653.95 in HOME funds for the construction of single-family homes in these R/ECAP areas. I have attached the Neighborhood Investment Strategies in Target Areas that the City anticipates, which utilizes both CDBG and non-CDBG funding to address R/ECAP neighborhoods. The City has also committed \$300,000 in NSP funds for new construction and over \$450,000 in CDBG funds. This is in conjunction with other down payment housing assistance and FY 2016 CDBG commitments in the Annual Action Plan. The City will continue to analyze demographic and economic data concerning R/ECAP areas as time moves forward.

It is the prerogative of the City of Joliet to affirmatively further "the ability of persons, regardless of race, color, religion, sex, national origin, familial status, or handicap, of similar income levels

to have available to them the same housing choices.” (HUD Fair Housing definition) The City has and will continue to provide assistance and education concerning fair housing support, as well as looking to improve the City’s programs by expanding educational opportunities and building new partnerships with agencies such as yourself. I hope that in the future, our correspondence and interaction can be more positive than this interaction. I look forward to meeting you in the future and discussing how we can improve fair housing access for all in the City of Joliet.

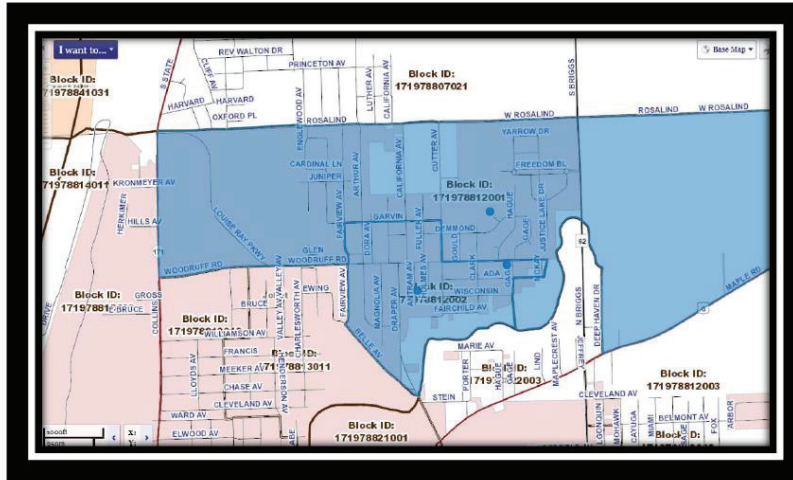
Sincerely,



Alfredo Melesio

FOREST PARK TARGET AREA

Forest Park



Past and Planned Investments in Forest Park Target Area

Forest Park		
<i>Project Name</i>	<i>Project Cost</i>	<i>Year</i>
Clark/Hague/Woodruff Sanitary Sewer Project	\$237,858	2011
Woodruff Road Relocation (Charlesworth-Collins)	\$1,698,000	2011-2015
Clark Street (Woodruff-Demmond) Reconstruction	\$109,000	2011-2015
Various resurfacing projects	\$296,000	2011-2015
Forest Park-Improvements to Baseball and Soccer Fields, Playground and Basketball Court	\$75,000	2015
Garvin Street (Fairmont-Luther) Reconstruction	\$254,000	2016-2020
Various resurfacing projects	\$375,000	2016-2020
Garvin (Arthur - Cutter) & California (Garvin - Woodruff) WM Replacement Project	\$999,600	2016
Forest Park Sanitary Sewer Evaluation	\$92,000	2016
Woodruff Road WM Rehabilitation (Arthur - Cutter)	\$600,000	2017
Forest Park WM Rehabilitation: Luther (Woodruff - Garvin), Arthur (Woodruff to Williamson to Magnolia), California (Woodruff to North End of Main), Cutter (Woodruff to Garvin)	\$1,500,000	2018
Forest Park Sanitary Sewer Rehabilitation	\$1,500,000	2019
Juniper (Fairmont-Arthur) Reconstruction	\$123,918	2020
Collins Street Task Force-Redevelopment of Former Joliet Prison Plan	attached	

Regional Developments

City of Joliet

- Down payment assistance in Joliet, which includes the Targeted Areas, with \$750,000 in HOME funds for low to moderate income buyers.
- The Con Plan also includes \$500,000 over five years for rehab assistance and demolitions with CDBG.
- The Con Plan also includes the purchase and renovation of a failed Section 8 based development.

State of Illinois

- Facilitating an investment of over \$40 million in the downtown transportation center that will improve rail, bus and bike service locally.

Private Non-Profit

- \$4.5 million renovation of an old school into an early learning center that was recently completed.

Joliet Junior College

- \$58 million invest in the downtown Joliet location for it's' workforce development, adult education and renowned culinary arts programs. In addition to multiple commercial-style teaching kitchens, the building will include a restaurant, student dining area, library, general classrooms and office space. The project should be complete in 2016.

University of Saint Francis and the Rialto Theatre

- \$5 million in renovation for the benefit of the University and Theatre programs downtown.

Will County

- Feasibility studies for the financing and construction of additional space for a new courthouse in the amount of \$250 million. Joliet recently dedicated \$12 million towards the construction of the courthouse.
- \$3 million launch of a purchase/rehab program funded by the Attorney General's Office. (50% in Joliet)

Housing Authority of Joliet

- \$18.6 million redevelopment of a former public housing site.

Private Developer

- Osprey, Hillwood, Mars, IKEA and Amazon announced reinvestments of 5.2 million sq.ft. of distribution centers south of this area which will result in over 2,700 full-time jobs being created.

Joliet Park District

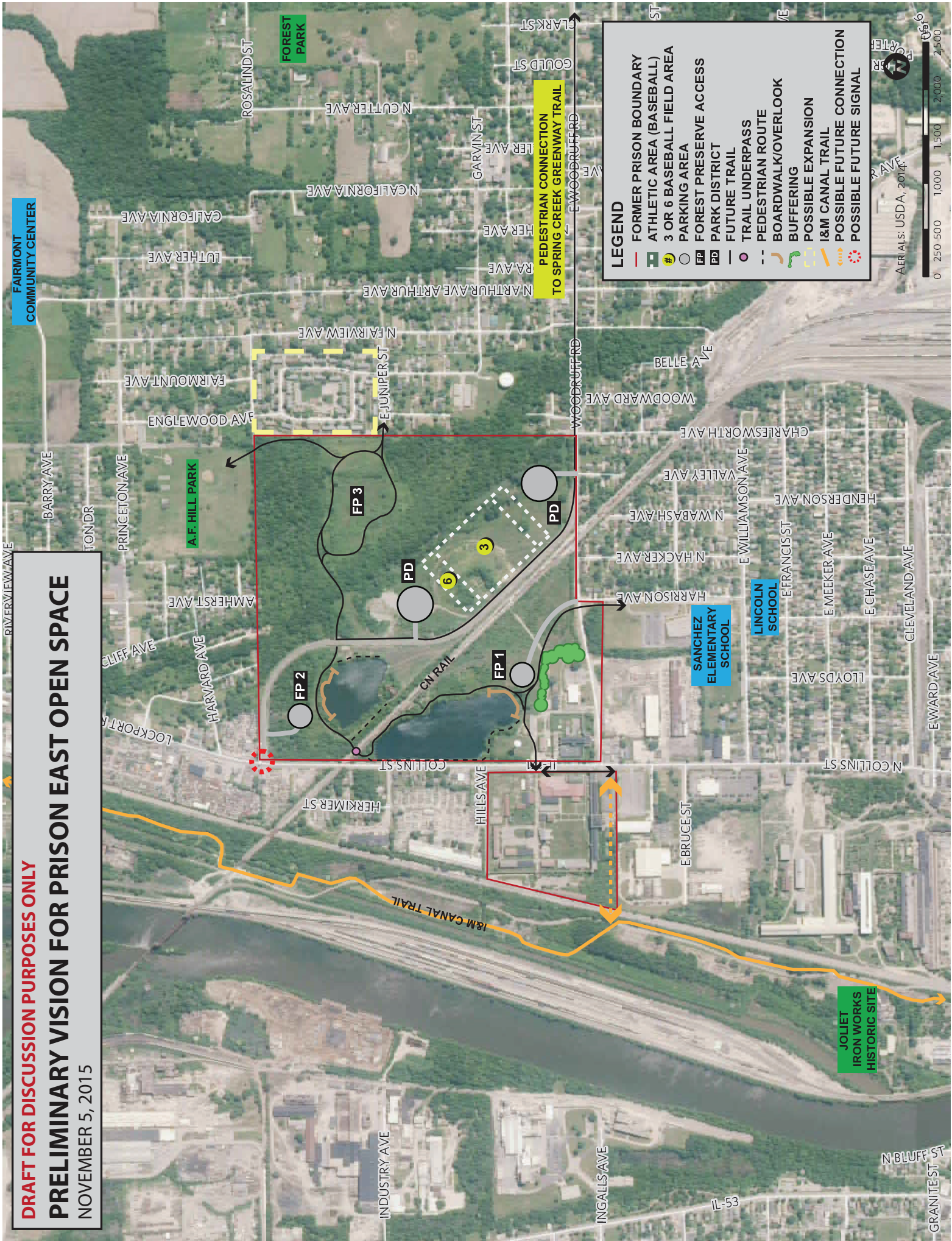
- Nowell Park: \$7 million, indoor multi-purpose center.

DRAFT FOR DISCUSSION PURPOSES ONLY

PRELIMINARY VISION FOR PRISON EAST OPEN SPACE

NOVEMBER 5, 2015

FAIRMONT
COMMUNITY CENTER



LEGEND

- FORMER PRISON BOUNDARY
- ATHLETIC AREA (BASEBALL)
- 3 OR 6 BASEBALL FIELD AREA
- PARKING AREA
- FOREST PRESERVE ACCESS
- PARK DISTRICT
- FUTURE TRAIL
- TRAIL UNDERPASS
- PEDESTRIAN ROUTE
- BOARDWALK/OVERLOOK
- BUFFERING
- POSSIBLE EXPANSION
- I&M CANAL TRAIL
- POSSIBLE FUTURE CONNECTION
- POSSIBLE FUTURE SIGNAL

AERIALS: USDA, 2014

0 250 500 1,000 1,500 2,000 2,500

66° 6'

JOLIET
IRON WORKS
HISTORIC SITE

SANCHEZ
ELEMENTARY
SCHOOL

LINCOLN
SCHOOL

A.F. HILL PARK

FOREST
PARK