



Analysis of Impediments to Fair Housing Choice (AI)

Public Meeting
February 6, 2017
City Council Chambers

Definitions

Fair Housing is the right to choose housing free from unlawful discrimination

- Federal, state, and local laws protect people from discrimination in housing transactions such as rentals, sales, mortgage lending, and insurance
- **Protected Class:** Group of people with a common characteristic who are legally protected from discrimination on the basis of that characteristic
 - **Federal:** race, color, national origin, ancestry, age, marital status, familial status, disability, religion
 - **State:** military status, sexual orientation, order of protection status
 - **Local:** source of income

Definitions (cont.)

An **Analysis of Impediments to Fair Housing Choice** is an analysis of fair housing data, an assessment of fair housing issues, identification of impediments to fair housing choice, and development of an action plan to overcome impediments

Fair Housing Obligation

As recipients of Community Development Block Grant (CDBG) funds, the City is legally obligated to

Affirmatively Further Fair Housing:

- The City must work to stop housing discrimination, and
- The City must work to de-segregate and integrate any racially concentrated areas of poverty in Naperville

Completing the AI is required to meet this obligation

AI Process

- Community and stakeholder outreach
 - Initial public meeting held at Housing Advisory Commission, July 11, 2016
 - Met with staff and stakeholders week of July 11, 2016 to gather feedback
 - Online community survey – 205 respondents
- Review goals in previous AI and assess progress
- Analysis of demographic, economic, housing market trends
- Identify impediments to fair housing choice based on outreach and data analysis
- Develop action plan to overcome impediments

AI Process (continued)

- Public meeting on draft AI held February 6, 2017
- Comments on draft AI accepted through February 21, 2017

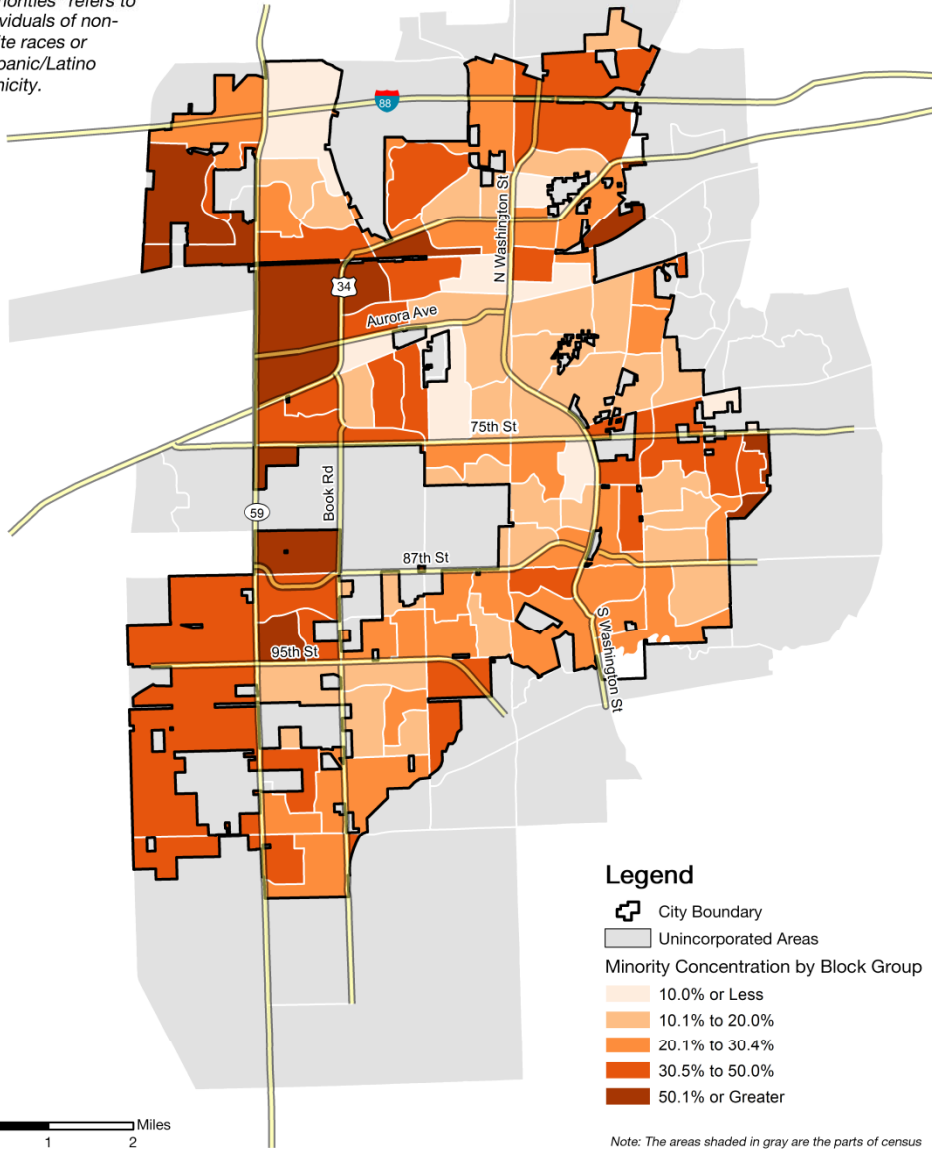
Summary of Findings

Concentrations of Minorities, 2014

City of Naperville AI



"Minorities" refers to individuals of non-White races or Hispanic/Latino ethnicity.



Naperville is becoming more racially and ethnically diverse, with a large Asian community and a growing Hispanic population.

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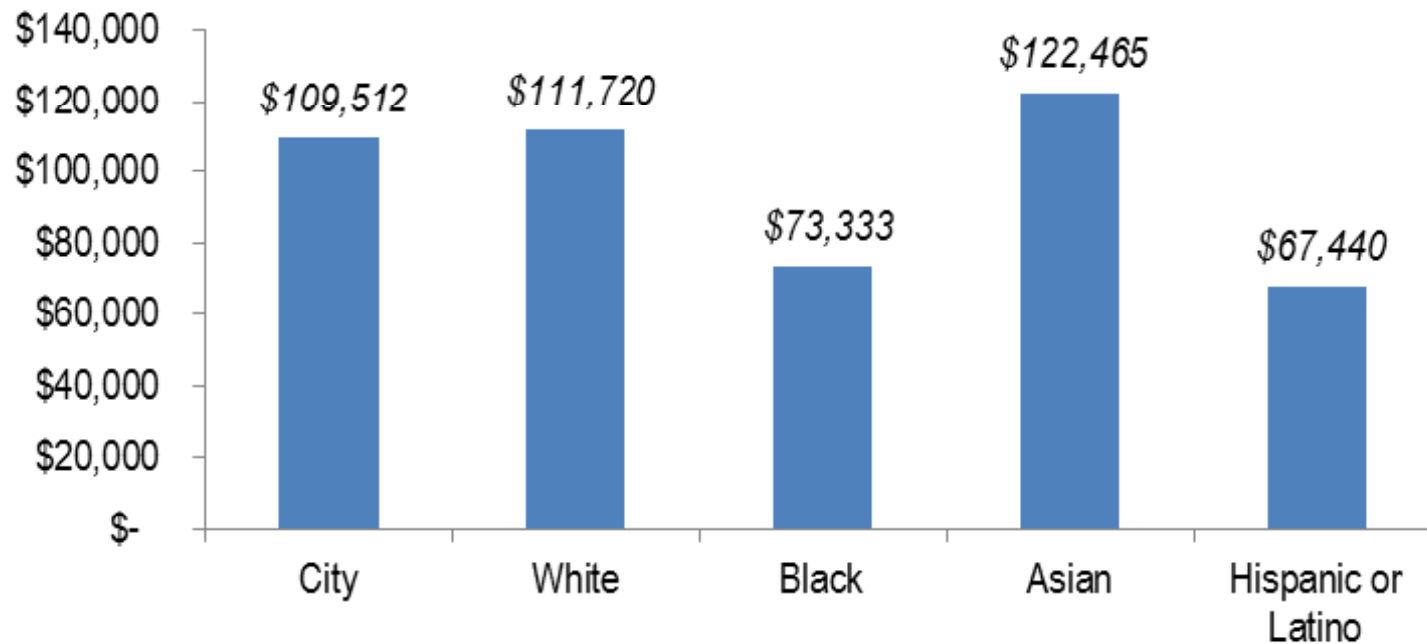
Mapping: Mullin & Lonergan Associates, 2016
Source: American Community Survey 5-Year Estimates, 2010-2014

Legend

- City Boundary
- Unincorporated Areas
- Minority Concentration by Block Group
 - 10.0% or Less
 - 10.1% to 20.0%
 - 20.1% to 30.4%
 - 30.5% to 50.0%
 - 50.1% or Greater

Note: The areas shaded in gray are the parts of census tracts in Naperville that extend beyond city limits. City boundaries are current as of July 12, 2016.

Median Household Income in Naperville, 2014



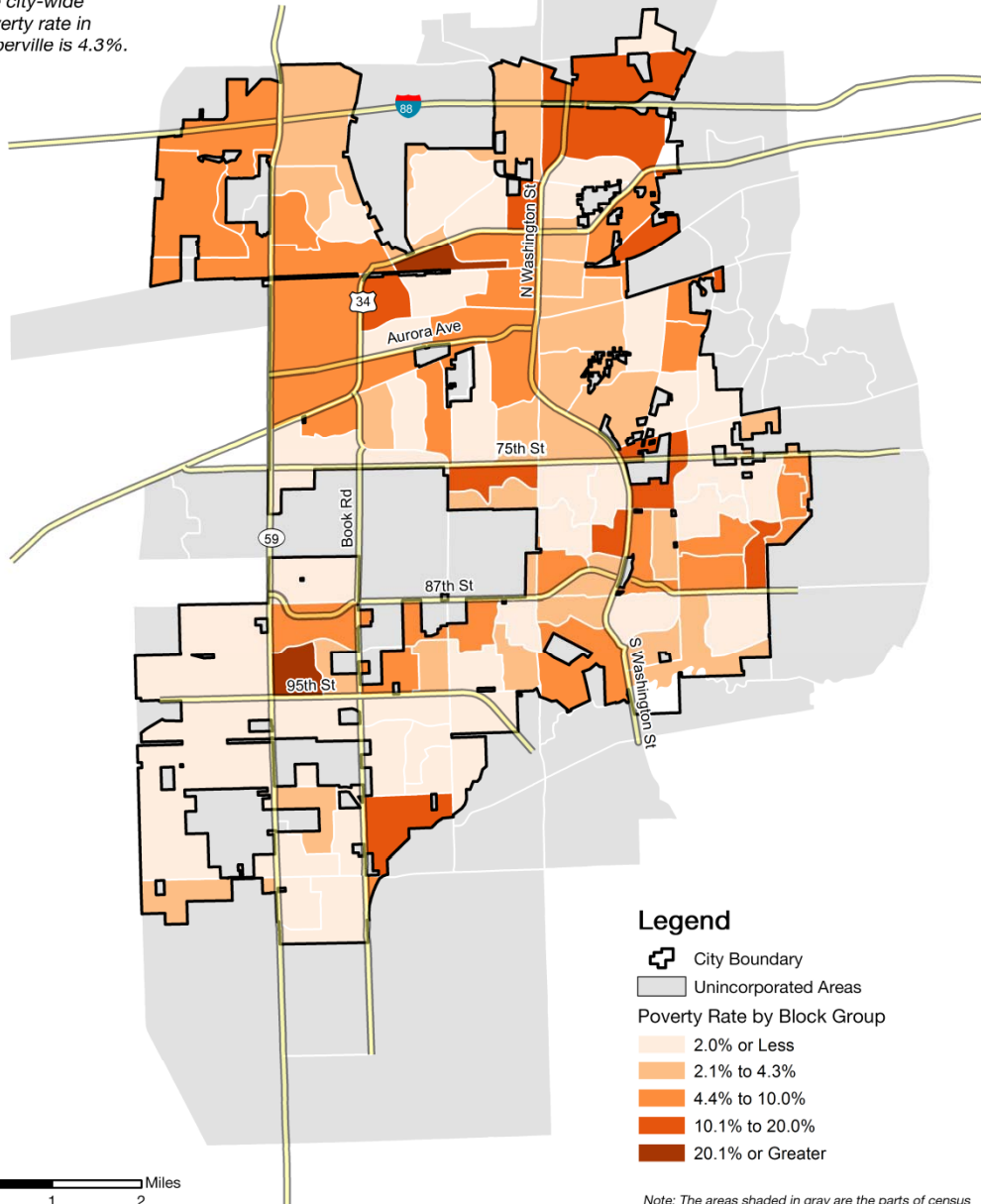
Generally, Naperville's residents have high incomes, with a median household income of \$109,512. There is a vast income disparity between racial and ethnic groups, however, with Black and Hispanic residents earning far less than the City's White and Asian population.

Poverty Rate, 2014

City of Naperville AI



The city-wide poverty rate in Naperville is 4.3%.



Poverty in Naperville is generally very low (4.3%), but there are some areas in the City with higher than average poverty levels.

Legend

- City Boundary
- Unincorporated Areas
- Poverty Rate by Block Group
 - 2.0% or Less
 - 2.1% to 4.3%
 - 4.4% to 10.0%
 - 10.1% to 20.0%
 - 20.1% or Greater

0 1 2 Miles

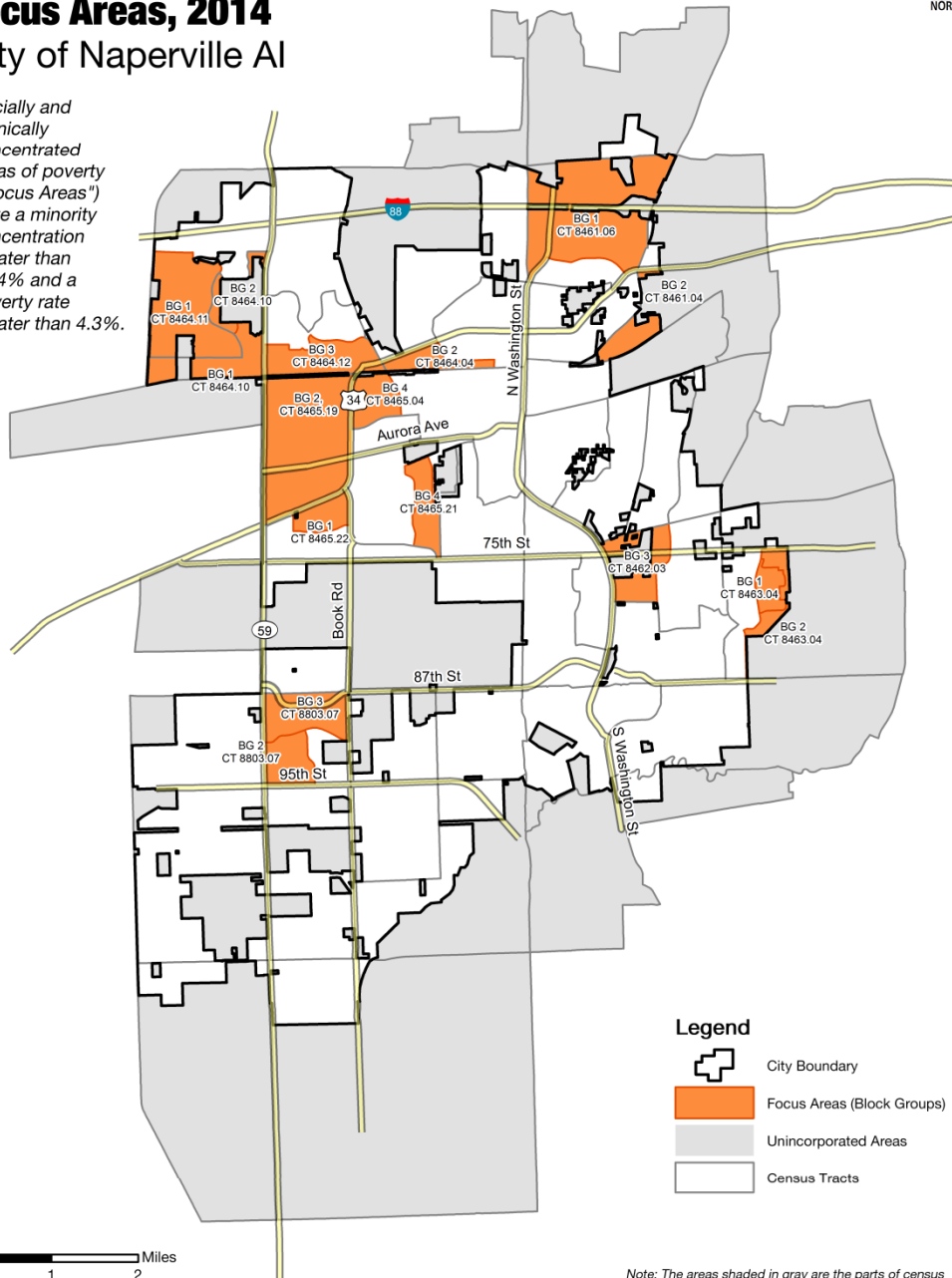
Mapping: Mullin & Lonergan Associates, 2016
Source: American Community Survey 5-Year Estimates, 2010-2014

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Focus Areas, 2014

City of Naperville AI

Racially and ethnically concentrated areas of poverty ("Focus Areas") have a minority concentration greater than 30.4% and a poverty rate greater than 4.3%.



0 1 2 Miles

Mapping: Mullin & Lonergan Associates, 2016
 Source: American Community Survey 5-Year Estimates, 2010-2014

Note: The areas shaded in gray are the parts of census tracts in Naperville that extend beyond city limits. City boundaries are current as of July 12, 2016.

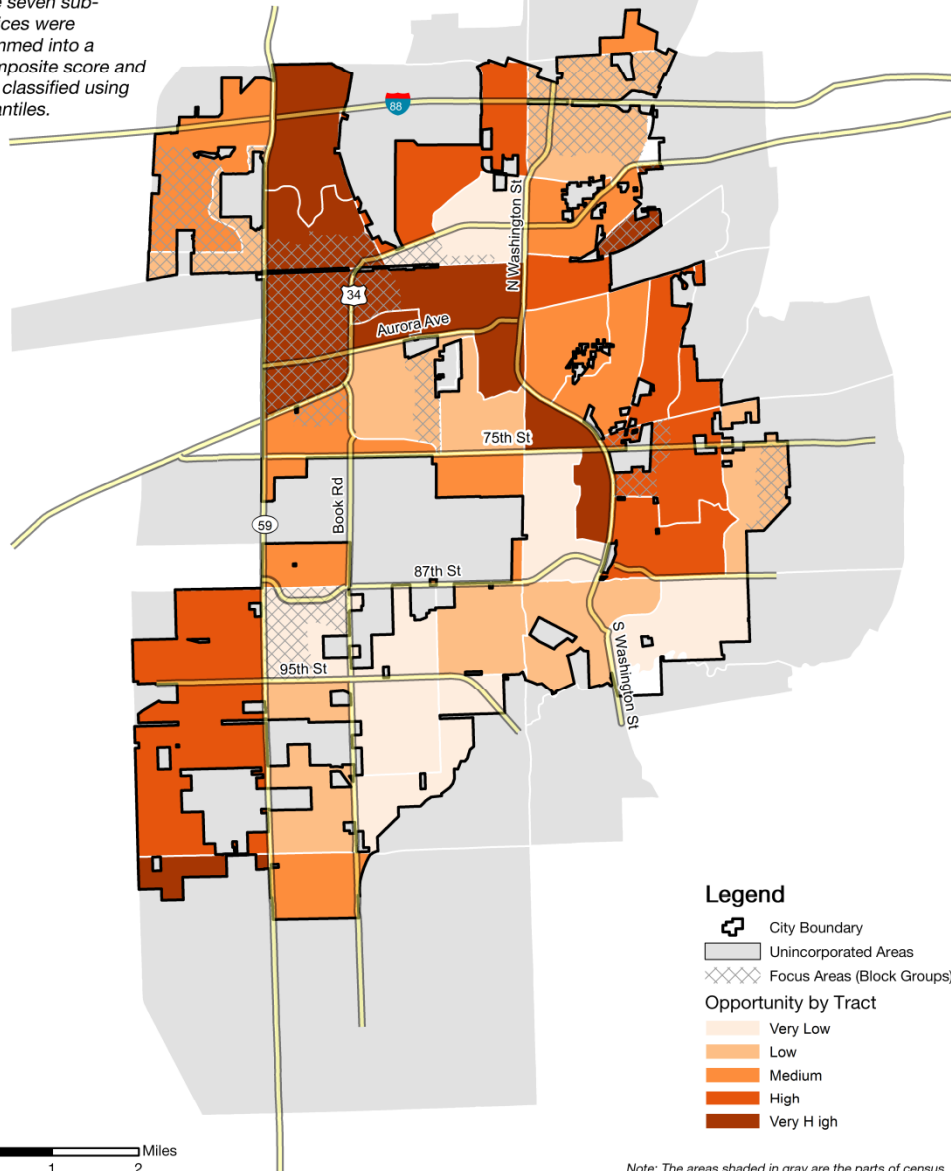
Some areas of Naperville have both higher poverty rates and racial/ethnic minority concentrations than the City overall – these are called “Focus Areas”

Comprehensive Opportunity Index

City of Naperville AI



The seven sub-indices were summed into a composite score and are classified using quantiles.



0 1 2 Miles

Mapping: Mullin & Loneragan Associates, 2016
Source: American Community Survey 5-Year Estimates, 2010-2014

Note: The areas shaded in gray are the parts of census tracts in Naperville that extend beyond city limits. City boundaries are current as of July 12, 2016.

Some Focus Areas are located in Census Tracts with high access to opportunity.

Opportunity measured according to national indexes: job proximity, environmental health, access to transportation, school proficiency, labor market participation, exposure to poverty.

Fair Housing Action Plan



Impediments

- Fair housing education and outreach efforts continue to be necessary to educate residents about their rights and responsibilities and to deter housing discrimination
- Persons with limited English proficiency may not be able to fully access Naperville's housing and community development programs and services for which they are eligible due to language barriers
- An inadequate supply of affordable housing throughout Naperville
- The public transportation system within Naperville restricts housing choice and access to employment and education opportunities for residents who are transit-dependent

| Goal | Action Items |
|--|---|
| Increase fair housing education and outreach opportunities available to residents; landlords, property management agents and real estate professionals; City staff, appointed boards and commissions; and, City municipal leaders | 1A. Designate the Housing Advisory Commission as the entity responsible for overseeing the implementation of this Fair Housing Action Plan with support from the staff liaison to the Housing Advisory Commission, the Transportation, Engineering, and Development (TED) Business Group and the City Clerk’s Office |
| | 1B. Contract with a HUD-certified fair housing organization to conduct paired real estate testing in the rental market based on source of income, disability and race |
| | 1C. Contract with a HUD-certified fair housing organization to conduct fair housing education and outreach workshops for residents, landlords, real estate agents, property management agents, lenders, City staff, City Council, and City boards and commissions |
| | 1D. Contract with a HUD-certified homebuyer counseling organization to provide homebuyer education and financial management training, especially for groups with low homeownership rates |
| | 1E. Direct all housing discrimination complaints received from City residents to a HUD-certified fair housing organization for investigation and enforcement |
| | 1F. Amend Title 10, Section 5, §10-5-6-1 of the Naperville Municipal Code to allow a housing discrimination complaint to be investigated as long as it is filed within one year of the alleged unlawful act that forms the basis of the complaint |
| | 1G. Annually review progress on achieving the AI goals and objectives |

| Goal | Action Items |
|---|---|
| <p>Ensure that persons with limited English proficiency can access the City's affordable housing and community development services and programs</p> | <p>2A. Develop and implement a Language Access Plan that conforms to HUD'S Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 Fed. Reg. 13; Jan. 22, 2007)</p> |
| <p>Expand affordable housing choice throughout Naperville to meet existing and future market demand for members of the protected classes</p> | <p>3A. Prepare an Affordable Housing Plan to determine the degree to which affordable housing demand exceeds current housing supply; implement any recommendations as supplemental initiatives to this Fair Housing Action Plan</p> <p>3B. Fully integrate planning for affordable housing and fair housing into the comprehensive planning and implementation process with plan amendments</p> <p>3C. Identify parcels of land appropriate for rezoning for multi-family development; amend the City Zoning Map to rezone these parcels and create opportunities for new affordable housing development</p> |

| Goal | Action Items |
|--|--|
| Advocate for public transit systems to connect lower income neighborhoods and affordable housing communities with major employment centers and education facilities | 4A. Work with social service providers to better understand the transportation needs of the protected classes and other lower income households |
| | 4B. Establish a formal policy of locating public service facilities for City agencies on bus lines, whenever possible, and encourage other agencies (e.g. social services) to do the same |
| | 4C. Work with Chicago RTA and PACE to coordinate future transit route development with the review and approval process for affordable housing development |

Next Steps

Adoption of AI

- Comments on draft AI accepted through February 21, 2017
- Draft is available online:
 - <http://www.naperville.il.us/residents/fair-housing-and-discrimination/affirmatively-furthering-fair-housing/>
- Comments will be summarized in the final document and incorporated as revisions as appropriate
- City Council will vote to adopt the AI after the public comment period is over – either in late February or early March.

Accountability

- Goals will be incorporated into the City's annual action plan, which discusses how CDBG funds will be spent, as appropriate
- HAC will regularly evaluate progress on Fair Housing Action Plan
- Progress will be formally evaluated through required annual reports to HUD

Comments to:

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