

10-24-78

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10/24/78

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOROTHY GAUTREAUX, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	No.
)	66 C 1459
PATRICIA R. HARRIS, Secretary of)	66 C 1460
of the U. S. Department of)	
Housing and Urban Development)	(Consolidated)
and Chicago Housing Authority,)	
et al.,)	
)	
Defendants.)	
)	

MEMORANDUM AND AFFIDAVIT OF THE
CITY OF CHICAGO IN OPPOSITION TO
PLAINTIFFS' MOTION FOR FURTHER
RELIEF AGAINST DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT

This memorandum and affidavit are submitted by the City of Chicago in opposition to the motion filed by plaintiffs on September 22, 1978 which seeks relief against the United States Department of Housing and Urban Development. The City of Chicago adopts the memorandum of the Secretary of the Department of Housing and Urban Development. The purpose of this additional memorandum is to supplement that of the Secretary with brief descriptions of the positive public housing achievements of the City.

The Housing and Community Development Act of 1974 established a system of federal assistance for HUD administered community development programs into a single block grant program. Title I of the Act provides for a single grant of funds for programs embracing a variety of community and social services including a wide range of social, educational, environmental and public welfare programs. Programs funded by the Community Development Block Grant include such diverse activities as: urban renewal projects, housing rehabilitation, community facilities, public improvements, water mains and sewers, parks and recreation facilities as well as public service activities appropriate to support these physical development programs. The Act limits the role of the Secretary of HUD to approving the grant application but places primary responsibility for planning and co-ordinating these several community development activities upon "local elected officials." Section 5304(a) of the Act requires those local officials to submit an application containing a community development plan identifying community development needs and objectives and a strategy to meet them. The application must contain programs to meet those community needs and identifying resources available to fund them. In addition to programs designed to eliminate slums and blight and to provide improved community facilities and services the applicant must also submit a housing assistance plan (HAP) which surveys housing stock and assesses housing

assistance needs of lower income people residing in or expected to reside in the community and establishes goals for the number of units and lower income persons to be assisted.

The housing component of the Act is set out in Title II, which provides for federal assistance to a range of housing programs. Although the submission and approval of a HAP is a condition of receiving the community development block grant funds, funds for all community development programs are positively provided for in the comprehensive block grant provisions of Title I. Thus, viewed in this context it can be seen that plaintiffs' motion for additional relief affects a wide range of co-ordinated and integrated community development projects although the motion itself focuses exclusively upon the housing aspect of Title II.

A prominent feature of Title II is Section 8 which, in turn, consolidates all programs of housing subsidy. While Title I, through the HAP, places responsibility for assessing needs and establishing housing goals upon local governmental officials, Section 8 places the primary responsibility for developing housing projects in the private sector. This allocation of responsibilities apparently reflects the legislative judgment that housing production is best left to the private sector. Although this view is no doubt well founded, certain contradictions do result as a consequence. Moreover, the legislation and implementing regulations impose other restrictions including guidelines on allowable unit costs which also con-

dition the attainability of HAP goals. HUD prototype cost limitations, for example, have been a cardinal factor frustrating the efforts of CHA to utilize housing reservations. Rapidly inflating construction costs which outstrip allowable prototype figures - not the lack of available sites - have proved to be the primary obstacle to CHA's program. CHA has mounted a continuing effort to redesign lower construction cost buildings to overcome this problem.

Thus, as the attached affidavit of David N. Larson, Deputy Commissioner of the City's Department of Planning, (Exhibit I) indicates local government labors under an awkward responsibility for realizing housing programs involving many factors over which it has little or no control. The City of Chicago's experience in coping with these many problems has roughly paralleled, and in certain respects exceeded, that of other urban communities. (Exhibit I, pp. 8-9) Chicago for example, met 88% of its 1975 HAP goal and rated higher than 59% of HUD's 147 sample entitlement cities. For the 1975-1976 Fiscal Year Chicago's Family and Large Family performance varied only slightly from those of the 147 entitlement cities.

Despite these substantial accomplishments of the defendants, plaintiffs on August 22, 1978 filed an administrative complaint seeking the imposition of conditions on the City's Year IV community development grant. On review of the complete

file, including plaintiffs' administrative complaint, Mr. Binford, HUD's Area Manager, did impose certain requirements upon the City in his approval letter of September 27, 1978. Plaintiffs, however, anticipating that conditions would not be imposed or that more stringent conditions could be formulated, on September 22, 1978 had filed the instant motion. This motion re-argues some of the points advanced in their administrative complaint and makes other arguments not earlier set forth, particularly relying upon the court's order of May 5, 1975, and sought an injunction requiring HUD to impose conditions on the grant.

It is respectfully submitted that the requirements included in the letter of September 27 afford all relief warranted by the facts.

Plaintiffs' dissatisfaction with the requirements imposed by letter of September 27th presumably stems from their belief that those requirements are not sufficiently "specific" and "enforceable." (Motion, p. 17 ¶31) Because, as has been earlier noted, the success of these programs is highly dependent upon private sector responses and fluctuating economic factors not within the City's control an injunction commanding rigid, mandatory achievements would be inappropriate. Moreover, at a time when the affirmative efforts of defendants to stimulate private sector involvement (Exhibit I, pp. 4-5), particularly in Section 8 new construction and substantial rehabilitation are beginning to bear fruit and a positive move-

ment in private sector interest in these programs is developing there is substantial reason for concluding, as HUD has done, that the City can and will make its best efforts to satisfy the requirements of the September 27, 1978 letter. Manifestly these private sector trends indicate that this is not the appropriate moment for local government to re-focus its efforts upon starting a new housing production program of its own in the speculative hope that it can perform more effectively than private developers. For these reasons the suggestion of plaintiffs that HUD should be enjoined to command the City to become primarily involved in housing production is both unfounded and ill-timed.

There is, moreover, no basis for the imposition of equitable relief under the circumstances. Only if it were demonstrated that the Year IV HAP, as qualified by the requirements included in the September 27th letter, does not address the needs of the plaintiff class or that the City will not conform to those requirements would there be a basis for injunctive remedy. Neither of those conditions obtain here.

The conclusions of HUD as evidenced by its letter of approval is that the HAP as amended by the added HUD requirements is not plainly inappropriate to meet the housing needs of lower income persons in the community and that the City has the continuing capacity to carry out that program. HUD arrived at this conclusion pursuant to the administrative procedures and criteria enjoined upon it by its regulations

including a review of the City's application in light of plaintiffs' administrative complaint as provided by 24 CFR 470.311(b). The standard to be applied by the court for review of such discretionary agency actions within the scope of the Secretary's authority has been clearly enunciated by the United States Supreme Court in the case of Citizens to Preserve Overton Park v. Volpe, 401 U.S. 402 (1971). The court rejected the argument that the reviewing court should set aside agency action which is found to be unsupported by substantial evidence or unwarranted by the facts. The proper standard to be applied to discretionary action taken by the Secretary is a narrow one. The court is not empowered to substantiate its judgment for that of the agency, rather as Overton Park and Broaden, et al., v. Harris, et al., 415 F. Supp. 1215 (1978) (discussed by HUD in its memorandum herein) make clear, equitable relief would be available only if "the challenged agency action was arbitrary, capricious or an abuse of discretion, or was not in accordance with the law." 415 F. Supp. 1215 a6 1225.

Plaintiffs' motion fails not only to demonstrate HUD's violation of those standards but also is procedurally inappropriate. A final decision by the responsible HUD officer which does not provide for the refusal to grant Federal financial

assistance constitutes "final agency action" within the meaning of the Administrative Procedure Act, 5 U.S.C. §704 (24 CFR §2.104(c)). Compliance with the procedures of the Administrative Procedure Act available to a party aggrieved by agency action permit the court to review agency action on the basis of the administrative record to determine if the conclusions reached by the agency should be set aside as arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law. 5 U.S.C. §706. By filing in this court a motion which presents issues not included and argued in the administrative complaint the plaintiffs have placed both the court and the agency at a disadvantage. The court does not have a proper record before it to review and the agency did not have an opportunity to hear many of the arguments plaintiffs now make before this court. If the plaintiffs believe that they did not receive a full and fair hearing on their administrative complaint before the agency, an appropriate remedy has been made available to them by the procedures set forth in the Administrative Procedure Act, 5 U.S.C. §701 et seq.,

CONCLUSION

The substantial evidence that the City of Chicago has effectively implemented the housing goals and objectives of the Community Development Act, dictates that court intervention would be unwarranted. The Secretary of the Department of Housing and Urban Development in approving the Community Development Block Grant by her letter of September 27, 1978 indicated a balanced judgment sensitive to both the need for low income housing, and the realistic ability of the City to accomplish these desired goals within the framework of existing financial and legislative resources. Plaintiffs' request for relief should therefore be denied.

Respectfully submitted,

WILLIAM R. QUINLAN
Corporation Counsel of the City of Chicago
511 City Hall, Chicago, Illinois 60602
Attorney for City of Chicago

EARL L. NEAL
Special Assistant Corporation Counsel
ROBERT RETKE,
Kathleen Ransford,
Assistant Corporation Counsel,
of Counsel.

EXHIBIT I

AFFIDAVIT OF DAVID N. LARSON,
DEPUTY COMMISSIONER OF THE
DEPARTMENT OF PLANNING CITY
AND COMMUNITY DEVELOPMENT
REGARDING THE CITY OF CHICAGO'S
HOUSING ASSISTANCE PROGRAM.

CITY OF CHICAGO'S IMPLE-
MENTATION OF HOUSING ASSIS-
TANCE PLAN OBJECTIVES

I

ACTIVITIES UNDERTAKEN BY
THE CITY OF CHICAGO TO IN-
CREASE THE HOUSING STOCK
FOR LOW INCOME FAMILIES IN
THE GENERAL HOUSING AREA

A. ARMITAGE KEDZIE AREA

The Department of Urban Renewal of the City of Chicago approved and authorized a grant in the amount of \$558,000 for the rehabilitation of Multi-unit Residential Properties within the general housing area of Armitage and Kedzie. This project was implemented pursuant to a request from the Hispanic Housing Development Corporation cooperating with the Chicago Area Renewal Effort Service Corporation participating in the acquisition and rehabilitation of existing housing.

This project has programmed the rehabilitation of 160 dwelling units and 6 structures at the following specific locations:

- (1) 2100-06 North Kedzie.
- (2) 2114-22 North Kedzie.
- (3) 2138-40 North Kedzie.
- (4) 3216-18 W. Dickens.
- (5) 3220-22 W. Dickens.

This rehabilitation will provide 112 one-bedroom units, 37 two-bedroom units, and 11 three-bedroom apartments. This housing will be available for use by low income persons through the utilization of the Section 8 program, coupled with mortgage financing through the Illinois Housing Development Authority. The total cost of the project is approximately \$6,500,000.

At present, the developers have received a letter of feasibility from the Illinois Housing Development Authority and it is anticipated that rehabilitation activity will commence immediately upon receipt of the IDHA financing commitment.

B. UPTOWN CONSERVATION AREA

The City of Chicago has designated the Uptown Area in the City of Chicago as an Urban Renewal conservation area for clearance in accordance with Illinois Revised Statutes (1977) Ch. 67-1/2 Section 1 et. seq. Pursuant to this legislative authority, the City will acquire land and make sites available for development by private developers and will assist the developers in the utilization of Section 8 funds in order to make the housing available for persons of low income.

C. HASKINS HERMITAGE PROJECT.

The Department of Urban Renewal on August 24, 1976 designated the Haskins-Hermitage Development Project for acquisition and redevelopment. The proposed developer has applied for IDHA financing, requesting that it be designated a priority site, and for Section 8 Assistance.

At present, there are only 5 parcels remaining to be acquired and condemnation proceedings have been instituted and are presently pending on the trial call in the Circuit Court of Cook County for a determination of just compensation.

It is anticipated that this site will provide up to 106 units of housing with a majority being available for low income persons.

PROPOSED PROJECTS FOR 1978
TRANSITION YEAR ATTACHED
HERETO AS EXHIBIT 3 IS THE
CITY OF CHICAGO HOUSING
ASSISTANCE PLAN WHICH DE-
LINEATES THE ACTIVITIES AND
PROGRAMS WITH A VIEW TOWARD
INCREASING THE HOUSING STOCK
IN THE CITY OF CHICAGO PRI-
MARILY FOR LOW AND MODERATE
INCOME PERSONS

Exhibit 2 attached hereto sets forth an analysis the Housing Assistance Plan objectives and the achievements by the City of Chicago for 3 program years of CDBD.

The following are some of the activities which will be undertaken to implement the said plan:

1. Housing Developers will be encouraged by the City of Chicago to utilize the Section 8

Program and indeed through Fiscal Year 1977 all of the Section 8 funds available in Chicago have been committed.

- A. The City of Chicago during the first 2 program years of CDBG funding - approximately \$38,000,000 were committed for projects within the City.
- B. \$5,838,000 was approved resulting from the 4 notifications of funds available (NOFA). Pursuant to advertisement by HUD, an additional \$11,892,000 was approved for Section 8 funded through IDHA.
- C. \$3,000,000 was allocated for projects funded under Section 202.
- D. \$4,551,000 was committed by HUD for the rehabilitation of City/State Financed Public Housing Projects.
- E. \$8,627,000 was allocated by HUD for the conversion of the CHA Section 23 Leasing Program.

F. \$4,046,000 was approved by HUD
for the Section 8 Existing Housing Program.

2. Seminars will be conducted between the public agencies and private sector in an attempt to increase the production of Section 8 family housing.
3. The Department of Urban Renewal of the City of Chicago will acquire land in the designated project areas as set forth in the plan subject to the public approval process, and said land will be offered for development by private developers. The private developers will be encouraged to utilize the Section 8 Housing Assistance.
4. In the Urban Renewal sites, the City of Chicago will request pre-approval in relation to the HUD site and neighborhood standards.

5. The City of Chicago will continue in its Community Development Block Grant Demonstration Multi-Family Rehabilitation program to require property owners to set aside 40% of the units for Section 8 eligible families. Since December, 1977 when this requirement was imposed, seven grants involving 259 apartments have been approved under this program and the owner of a previously approved 25 unit building in Hyde Park has agreed to meet this requirement.

ACTIONS TAKEN TO PROVIDE
FAMILY HOUSING TO LOW IN-
COME PERSONS

- A. ASSISTANCE TO CHA IN
SUPPLEMENTATION OF THE
SECTION 8 EXISTING HOUS-
ING ASSISTANCE PROGRAM

The City of Chicago has established a special task force of relocation representatives, pursuant to a letter of agreement with the Chicago Housing Authority to assist Section 8 Certificate Holders to secure housing accommodations. This task force was implemented February of 1978 and has increased the participation of landlords and has assisted lower income families and individuals in securing housing.

The Chicago Housing Authority has submitted reports to HUD indicating that of the total 5,374 units authorized that 5,122 Certificates of Eligibility have been issued and that of those 3,829 are currently under lease.

For the period March 31, 1978 through June 30, 1978 a total of 715 units have been secured and are presently occupied.

The objectives for Existing Housing under Section 8 as set forth in a HUD letter of September 28, 1978 have been achieved in that the City fully met its 1975 goal and has surpassed the 1976 objective by 262 units.

B. URBAN DEVELOPMENT
ACTION GRANTS

The Department of Planning, City and Community Development has submitted applications for Urban Development Action Grants, two of which include proposals for Section 8 housing for families. The Antioch Missionary Baptist Church, located in the Englewood Conservation Area, proposes to construct approximately 200 units of housing for families with limited income.

In the Pullman National Historic Landmark District, the UDAG would provide funds for public improvements to support the conversion and rehabilitation of large unused industrial structures to provide 400 units of family housing.

C.

NEIGHBORHOOD STRATEGY

In May, 1978 the City of Chicago applied to HUD for approval of the designation of two Neighborhood Strategy Areas in which special Section 8 Substantial Rehabilitation Procedures would be made available from the Federal Government. The City has obtained HUD approval for 382 units under Section 8 NSA.

ANALYSIS OF HOUSING
ASSISTANCE PLAN
ACHIEVEMENTS BY THE
CITY OF CHICAGO

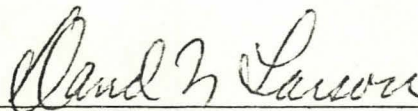
The Third Annual Report of The Community Development Block Grant Program submitted to Congress in March, 1978 by Secretary Harris contains a study of Housing Assistance Plans from 147 Sample Entitlement Cities.

The HUD data showed what percentage of 1975 HAP goals were actually met in the sample 147 cities. The HUD data showed what percentage of the 1975 HAP goals were actually met in the sample 147 entitlement cities. Chicago met 88% of its 1975 HAP goal. On the HUD distribution table, Chicago rated higher than 59% of the sample cities. Only 36% were able to achieve 100% or more of their 1975 HAP goals. 10% were unable to provide any housing assistance at all. For Fiscal Year 1975-1976 an analysis of Section 8 assistance by household types reveals the following

comparison between the 147 entitlement cities and Chicago:

<u>Household Types</u>	<u>Sample Cities</u>	<u>Chicago</u>
Elderly	51%	58%
Family	36%	30%
Large Family	11%	12%
No distinction	2%	-

DAVID N. LARSON, first being duly sworn on oath deposes and says that he is the Deputy Commissioner of the Department of Planning, City and Community Development of the City of Chicago. He has the responsibility to supervise and administer the Community Development Block Grant Program of the City of Chicago and has personal knowledge of the matters set forth in Defendant's, City of Chicago, Exhibit 1. That the statements contained therein are true in substance and in fact.



DAVID N. LARSON

Subscribed and Sworn to
before me this 24th day
of October, 19 78 .

NOTARY PUBLIC

EXHIBIT II

HAP GOALS AND ACCOMPLISHMENTS AS OF SEPTEMBER 30, 1978

	TOTAL						TOTAL ONE	TOTAL ONE	1976	1976
	1975	1975	1976	1976	1977	1977	TOTAL ONE	YEAR GOAL	3 YEAR	3 YEAR GOAL
	ONE YEAR	ONE YEAR	ONE YEAR	ONE YEAR	ONE YEAR	ONE YEAR	YEAR GOALS	ACCOMPLISHMENTS	GOAL	ACCOMPLISHMENTS
	GOAL	ACCOMPLISHMENT	GOAL	ACCOMPLISHMENT	GOAL	ACCOMPLISHMENT	1975-76-77	TO DATE		TO DATE
<u>NEW CONSTRUCTION</u>										
<u>RENTAL</u>	<u>5,278</u>	<u>4,423</u>	<u>1,885</u>	<u>1,362</u>	<u>2,377</u>	<u>1,765</u>	<u>9,540</u>	<u>7,550</u>	<u>6,300</u>	<u>3,127</u>
Sec. 8-HUD		480	437	365	731	132		977	1,800	497
Sec. 8-IHDA		480	848	536	946	1,136		2,152	3,000	1,672
Sec. 236-HUD		874	50	261	--	--		1,135	--	261
Sec. 236-IHDA		1,029	350	--	--	--		1,029	--	--
Sec. 202		--	200	200	700	497		697	1,500	697
Public Housing		1,560	--	--	--	--		1,560	--	--
<u>REHABILITATION-RENTAL</u>	<u>5,111</u>	<u>1,819</u>	<u>2,969</u>	<u>2,266</u>	<u>2,462</u>	<u>1,225</u>	<u>10,542</u>	<u>5,310</u>	<u>5,938</u>	<u>3,491</u>
Sec. 8-HUD		83	1,593	1,804	737	715		2,602	1,998	2,519
Sec. 8-IHDA		580	434	200	1,000	72		852	1,200	272
Sec. 236-HUD		--	--	63	--	--		63	--	63
Sec. 236-IHDA		1,001	--	--	--	--		1,001	--	--
Sec. 312		10	150	7	100	30		47	450	37
CDEG		145	792	192	625	403		745	2,290	600
<u>EXISTING</u>	<u>1,450</u>	<u>3,959</u>	<u>2,345</u>	<u>1,436</u>	<u>654</u>	<u>111</u>	<u>4,449</u>	<u>5,506</u>	<u>3,900</u>	<u>1,547</u>
Sec. 8-HUD		3,959	2,345	1,436	654	111		5,506	3,900	1,547
<u>REHABILITATION-OWNER</u>	<u>0</u>	<u>209</u>	<u>1,481</u>	<u>287</u>	<u>1,795</u>	<u>570</u>	<u>3,276</u>	<u>1,066</u>	<u>3,922</u>	<u>857</u>
Sec. 312		54	100	13	50	31		98	300	44
Sec. 235		--	800	--	1,100	--		--	2,000	--
CDEG		86	468	172	250	240		498	1,440	412
NHS		69	113	56	240	183		303	182	239
Homestead		--	--	46	155	116		162	--	162
<u>NEW CONSTRUCTION-OWNER</u>	<u>0</u>	<u>0</u>	<u>200</u>	<u>1</u>	<u>0</u>	<u>0</u>	<u>200</u>	<u>1</u>	<u>600</u>	<u>1</u>
Sec. 235		0	200	1	--	--		1	600	1
<u>GRAND TOTAL</u>	<u>11,839</u>	<u>10,410</u>	<u>8,880</u>	<u>5,352</u>	<u>7,288</u>	<u>3,671</u>	<u>28,007</u>	<u>19,433</u>	<u>20,660</u>	<u>9,023</u>

HAP GOALS AND ACCOMPLISHMENTS AS OF SEPTEMBER 30, 1978

ELDERLY

	1975 ONE YEAR GOAL	1975 ONE YEAR ACCOMPLISHMENT	1976 ONE YEAR GOAL	1976 ONE YEAR ACCOMPLISHMENT	1977 ONE YEAR GOAL	1977 ONE YEAR ACCOMPLISHMENT	TOTAL ONE YEAR GOALS 1975-87-77	TOTAL ONE YEAR GOAL ACCOMPLISHMENTS TO DATE	1976 3 YEAR GOAL	1976 3 YEAR GOAL ACCOMPLISHMENTS TO DATE
<u>ELDERLY</u>										
<u>NEW CONSTRUCTION</u>										
<u>RENTAL</u>	<u>2,110</u>	<u>3,332</u>	<u>890</u>	<u>1,071</u>	<u>1,410</u>	<u>1,177</u>	<u>4,410</u>	<u>5,580</u>	<u>2,613</u>	<u>2,248</u>
Sec. 8-HUD		480	247	365	400	--		845	500	365
Sec. 8-IHDA		428	373	506	310	680		1,614	613	1,186
Sec. 236-IHDA		864	70	--	--	--		864	--	--
Sec. 202		--	200	200	700	497		697	1,500	697
Public Housing		1,560	--	--	--	--		1,560	--	--
<u>REHABILITATION-RENTAL</u>	<u>626</u>	<u>115</u>	<u>400</u>	<u>561</u>	<u>745</u>	<u>140</u>	<u>1,771</u>	<u>816</u>	<u>1,017</u>	<u>701</u>
Sec. 8-HUD		73	200	506	400	--		579	392	506
Sec. 8-IHDA		42	100	--	310	36		78	300	36
Sec. 312		--	23	--	5	3		3	75	3
CDBG		--	77	55	30	101		156	250	156
<u>EXISTING</u>	<u>970</u>	<u>2,626</u>	<u>828</u>	<u>43</u>	<u>240</u>	<u>0</u>	<u>2,038</u>	<u>2,669</u>	<u>1,500</u>	<u>43</u>
Sec. 8-HUD		2,626	828	43	240	--		2,669	1,500	43
<u>REHABILITATION-OWNER</u>	<u>0</u>	<u>0</u>	<u>67</u>	<u>36</u>	<u>85</u>	<u>118</u>	<u>152</u>	<u>154</u>	<u>200</u>	<u>154</u>
Sec. 312		--	--	1	5	3		4	--	4
CDBG		--	67	35	25	65		100	200	100
Homestead		--	--	--	55	4		4	--	4
NHS		--	--	--	0	46		46	--	46
<u>GRAND TOTAL</u>	<u>3,706</u>	<u>6,073</u>	<u>2,185</u>	<u>1,711</u>	<u>2,480</u>	<u>1,435</u>	<u>8,371</u>	<u>9,219</u>	<u>5,330</u>	<u>3,148</u>

HAP GOALS AND ACCOMPLISHMENTS AS OF SEPTEMBER 30, 1978

FAMILY

	1975 ONE YEAR GOAL	1975 ONE YEAR ACCOMPLISHMENTS	1976 ONE YEAR GOAL	1976 ONE YEAR ACCOMPLISHMENTS	1977 ONE YEAR GOAL	1977 ONE YEAR ACCOMPLISHMENT	TOTAL ONE YEAR GOAL 1975-76-77	TOTAL ONE YEAR GOAL ACCOMPLISHMENTS TO DATE	1976 3 YEAR GOAL	1976 3 YEAR GOAL ACCOMPLISHMENTS TO DATE
<u>FAMILY</u>										
<u>NEW CONSTRUCTION</u>										
<u>RENTAL</u>	<u>2,868</u>	<u>948</u>	<u>612</u>	<u>195</u>	<u>543</u>	<u>458</u>	<u>4,023</u>	<u>1,611</u>	<u>1,800</u>	<u>663</u>
Sec. 8-HUD		-	95	--	225	84		84	800	84
Sec. 8-IHDA		52	237	--	318	384		436	1,000	384
Sec. 236-HUD		763	--	195	--	--		958	--	195
Sec. 236-IHDA		133	280	--	--	--		133	--	0
 <u>REHABILITATION-RENTAL</u>	 <u>3,485</u>	 <u>1,250</u>	 <u>1,887</u>	 <u>1,381</u>	 <u>1,043</u>	 <u>689</u>	 <u>6,415</u>	 <u>3,320</u>	 <u>3,872</u>	 <u>2,070</u>
Sec. 8-HUD		6	1,025	1,039	228	511		1,556	1,182	1,550
Sec. 8-IHDA		504	167	180	345	28		712	700	208
Sec. 236-HUD		--	--	47	--	--		47	--	47
Sec. 236-IHDA		595	--	--	--	--		595	--	--
Sec. 312		--	105	4	65	13		17	300	17
CDBG		145	590	111	405	137		393	1,690	248
 <u>EXISTING</u>	 <u>380</u>	 <u>493</u>	 <u>1,348</u>	 <u>933</u>	 <u>207</u>	 <u>0</u>	 <u>1,935</u>	 <u>1,426</u>	 <u>1,538</u>	 <u>933</u>
Sec. 8-HUD		493	1,348	933	207	--		1,426	1,538	933
 <u>REHABILITATION-OWNER</u>	 <u>0</u>	 <u>145</u>	 <u>653</u>	 <u>186</u>	 <u>1,120</u>	 <u>302</u>	 <u>1,773</u>	 <u>633</u>	 <u>1,826</u>	 <u>488</u>
Sec. 312		36	85	8	30	22		66	255	30
Sec. 235		--	200	--	770	--		--	500	--
CDBG		40	312	94	150	115		249	980	209
NHS		69	56	56	120	95		220	91	151
Homestead		--	--	28	50	70		98	--	98
 <u>NEW CONSTRUCTION-OWNER</u>	 <u>0</u>	 <u>0</u>	 <u>100</u>	 <u>1</u>	 <u>0</u>	 <u>0</u>	 <u>100</u>	 <u>1</u>	 <u>200</u>	 <u>1</u>
Sec. 235		--	100	1	--	--	100	1	200	1
 <u>GRAND TOTAL</u>	 <u>6,733</u>	 <u>2,836</u>	 <u>4,600</u>	 <u>2,696</u>	 <u>2,913</u>	 <u>1,459</u>	 <u>14,246</u>	 <u>6,991</u>	 <u>9,236</u>	 <u>4,155</u>

HAP GOALS AND ACCOMPLISHMENTS AS OF SEPTEMBER 30, 1978

	LARGE FAMILY						TOTAL ONE	TOTAL ONE	1976	1976
	ONE YEAR	ONE YEAR	ONE YEAR	ONE YEAR	ONE YEAR	ONE YEAR	YEAR GOALS	YEAR GOAL	3 YEAR	3 YEAR GOAL
	GOAL	ACCOMPLISHMENT	GOAL	ACCOMPLISHMENT	GOAL	ACCOMPLISHMENT	1975-76-77	TO DATE	GOAL	ACCOMPLISHMENTS TO DATE
<u>LARGE FAMILY</u>										
<u>NEW CONSTRUCTION</u>										
<u>RENTAL</u>	<u>300</u>	<u>143</u>	<u>383</u>	<u>96</u>	<u>424</u>	<u>120</u>	<u>1,107</u>	<u>359</u>	<u>1,887</u>	<u>216</u>
Sec. 8-HUD		--	95	--	106	48		48	500	48
Sec. 8-IHDA		--	238	30	318	72		102	1,387	102
Sec. 236-HUD		111	50	66	--	--		177	--	66
Sec. 236-IHDA		32	--	--	--	--		32	--	--
<u>REHABILITATION-RENTAL</u>	<u>1,000</u>	<u>454</u>	<u>682</u>	<u>324</u>	<u>674</u>	<u>396</u>	<u>2,356</u>	<u>1,174</u>	<u>1,049</u>	<u>720</u>
Sec. 8-HUD		4	368	259	109	204		467	424	463
Sec. 8-IHDA		34	167	20	345	8		62	200	28
Sec. 236-HUD		--	--	16	--	--		16	--	16
Sec. 236-IHDA		406	--	--	--	--		406	--	--
Sec. 312		10	22	3	30	14		27	75	17
CDBG		--	125	26	190	170		196	350	196
<u>EXISTING</u>	<u>100</u>	<u>840</u>	<u>169</u>	<u>460</u>	<u>207</u>	<u>111</u>	<u>476</u>	<u>1,411</u>	<u>862</u>	<u>571</u>
Sec. 8-HUD		840	169	460	207	111		1,411	862	571
<u>REHABILITATION-OWNER</u>	<u>0</u>	<u>64</u>	<u>761</u>	<u>65</u>	<u>590</u>	<u>150</u>	<u>1,351</u>	<u>279</u>	<u>1,896</u>	<u>215</u>
Sec. 312		18	15	4	15	6		28	45	10
Sec. 235		--	600	--	330	--		--	1,500	--
CDBG		46	89	43	75	60		149	260	103
NHS		--	57	--	120	42		42	91	42
Homestead		--	--	18	50	42		60	--	60
<u>NEW CONSTRUCTION-OWNER</u>	<u>0</u>	<u>0</u>	<u>100</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>100</u>	<u>0</u>	<u>400</u>	<u>0</u>
Sec. 235		--	100	--	--	--	100	--	400	0
<u>GRAND TOTAL</u>	<u>1,400</u>	<u>1,501</u>	<u>2,095</u>	<u>945</u>	<u>1,895</u>	<u>777</u>	<u>5,390</u>	<u>3,223</u>	<u>6,094</u>	<u>1,722</u>

HUD COUNTED

ELDERLY 1975 HAP (9-15-75 to 9-15-76)

NEW CONSTRUCTION 3,332

Sec. 8-HUD 480

Neighborhood Redev.	138	X
Clarendon & Sunnyside	152	X
Paul Stewart III	190	X

Sec. 8-IHDA 428

Moody House	201	X
West Point 21	200	X
Elm Street Plaza	27	X

Sec. 236-IHDA 864

Grace St. Apts.	120	
Paul Stewart I	250	
Paul Stewart II	170	
Kenmore Housing	324	

Public Housing-CHA 1,560

3030 W. 21st Pl.	350	
1611 S. Racine	212	
9111 S. South Chicago	298	
116 W. Elm	269	
1750 W. Peterson	175	
1845 N. Larabee	86	
Lake & Parkside	170	

REHABILITATION 115

Sec. 8-HUD 73

5330 S. Harper	73	X
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Sec. 8-IHDA 42

New Vistas II	6	X
7000 S. Shore Dr.	36	X

Continued

DPCCD

EXISTING

2,626

Sec. 8-HUD

2,626

CHA (571 ACC
(Sec. 23 Conversion)

228
2398

X

TOTAL

6,073

FAMILY 1975 HZ (9-15-75 to 9-15-76)

HUD COUNTED

<u>NEW CONSTRUCTION</u>	<u>948</u>		
Sec. 8-IHDA	52		
Elm Street Plaza		52	X
Sec. 236-HUD	763		
Evergreen Sedgwick		48	
48th & King Dr.		315	
5053 King Dr.		64	
1226 S. St. Louis		29	
Division & Wells		307	X
Sec. 236-IHDA	133		
Neighborhood Commons		133	
<u>REHABILITATION</u>	<u>1,395</u>		
Sec. 8-HUD	6		
Voice of the People		6	X
Sec. 8-IHDA	504		
Elaine Place		75	X
Near West Side		16	X
Logan Square		163	X
Rogers Park Rehab		74	X
Waveland & Pine Grove		40	X
New Vistas II		136	X
Sec. 236-IHDA	595		
Parkway Gardens		362	
Fifth City		29	
Woodlawn Apts.		59	
New Vistas		145	
Sec. 312	36		
CDBG	185		
NHS	69		
<u>EXISTING</u>	<u>493</u>		
Sec. 8-HUD	493		
CHA (571 ACC		253	X
(Sec. 23 Conversion)		240	
TOTAL	<u>2,836</u>		

LARGE FAMILY 1 HAP (9-16-75 to 9-16-7

HUD COUNTED

<u>NEW CONSTRUCTION</u>	<u>143</u>		
Sec. 236-HUD	111		
Evergreen Sedgewick		36	
5053 King Dr.		32	
1226 S. St. Louis		43	
Sec. 236-IHDA	32		
Neighborhood Commons		32	
<u>REHABILITATION</u>	<u>518</u>		
Sec. 8-HUD	4		
1919 Oakdale		1	X
Voice of the People		3	X
Sec. 8-IHDA	34		
Near West Side		6	X
New Vistas II		12	X
Logan Square		10	X
Rogers Park Rehab		6	X
Sec. 236-IHDA	406		
Parkway Gardens		332	
Fifth City		29	
Woodlawn Apts.		42	
New Vistas		3	
Sec. 312	28		
CDBG	46		
<u>EXISTING</u>	<u>840</u>		
Sec. 8-HUD	840		
(Sec. 23 Conversion		750	
CHA (571 ACC)		90	X
<u>TOTAL</u>	<u>1,501</u>		

ASSISTED HOUSING ACCOMPLISHMENTS

ELDERLY 1976 HAP (9-16-76 to 9-16-77)

PROJECT NO.	HUD APPROVAL DATE	PROJECT	UNITS
<u>NEW CONSTRUCTION</u>			<u>1,071</u>
Section 8-HUD			365
IL06-0035-004	2-17-78	Residential Development Corp.	194
IL06-0035-013	5-12-77	Thorndale Manor	71
IL06-0035-022	2-16-77	7000 N. Sacramento	100
Section 8-IHDA			506
IL06-H121-101	9-30-76	Two Park Shore East	206
IL06-H121-108	4-19-77	Lawndale Terrace	120
IL06-H121-110	5-25-77	Broadway Sheridan	180
Section 202			200
IL06-1457-201	1-4-77	Japanese American	200
<u>REHABILITATION</u>			<u>597</u>
Section 8-HUD			506
IL06-0035-002	3-12-78	Commonwealth Apts.	145
IL06-0035-012	5-4-77	Shoreham Apts.	108
IL06-0037-004	5-26-77	6900 S. Crandon	151
IL06-0037-008	5-26-77	2218-24 W. Washington	11
IL06-0036-001	9-23-76	CHA	91
Section 312			1
CDBG			90
<u>EXISTING</u>			<u>43</u>
IL06-E002-005	9-29-77	CHA (389 ACC)	43
TOTAL			1,711

ASSISTED HOUSING ACCOMPLISHMENTS

FAMILY 1976 HAP (9-16-76 to 9-16-77)

PROJECT NO.	HUD APPROVAL DATE	PROJECT	UNITS	
<u>NEW CONSTRUCTION</u>			<u>195</u>	
Section 236-HUD			195	
St. Stephens Terr.				
<u>REHABILITATION</u>			<u>1,567</u>	
Section 8-HUD			1,039	
IL06-0036-001	9-28-76	CHA		1,039
Section 8-IHDA			180	
IL06-H121-107		North Side Rehab		180
Section 236-HUD			47	
44129				47
Section 312			12	12
CDBG			205	205
NHS			56	56
Homestead			28	28
<u>EXISTING</u>			<u>933</u>	
Section 8-HUD			933	
IL06-E002-003	9-26-76	CHA (875 ACC)	647	647
IL06-E003-005	9-29-77	CHA (389 ACC)	182	182
M-000-022	9-17-76	4640 W. Sheridan-Loan Man.	104	104
<u>NEW CONSTRUCTION-OWNER</u>			<u>1</u>	
Section 235			1	1
TOTAL			2,696	

October 10, 1978

ASSISTED HOUSING ACCOMPLISHMENTS

LARGE FAMILY 1976 HAP (9-16-76 to 9-17-77)

PROJECT NO.	HUD APPROVAL DATE	PROJECT		UNITS
<u>NEW CONSTRUCTION</u>			<u>96</u>	
Section 8-IHDA		Lawndale Terrace	30	30
Section 236-HUD		St. Stephens Terrace	66	66
<u>REHABILITATION</u>			<u>389</u>	
Section 8-HUD		CHA	259	259
Section 8-IHDA IL06-H121-107		Northside Rehab	20	20
Section 236-HUD		65th St. Dev. Corp.	16	16
Section 312 CDBG Homestead			7 69 18	7 69 18
<u>EXISTING</u>			<u>460</u>	
Section 8-HUD			460	
IL06-E002-005	9-29-77	CHA (389 ACC)	164	164
IL06-E002-003	9-26-76	CHA (875 ACC)	228	228
IL06-M-000-022	9-17-76	4640 W, Sheridan-Loan Man	28	28
IL06-E002-004	8-10-77	Leadership Council	40	40
TOTAL			<u>945</u>	

ASSISTED HOUSING ACCOMPLISHMENTS

ELDERLY 1977 HAP (9-16-77 to 9-16-78)

PROJECT NO.	HUD APPROVAL DATE	PROJECT	UNITS
<u>NEW CONSTRUCTION</u>			<u>1177</u>
Section 8-IHDA			680
IL06-H121-121	9-23-77	53rd & Cornell	92
IL06-H121-134	9-30-77	Pioneer Village	150
IL06-H121-135	4-5-78	Henroten/Morningside N.	248
IL06-H121-148	9-28-78	Dearborn Park Elderly	190
Section 202			497
IL06-0622-201	9-26-77	St. Paul House	149
IL06-1086-201	9-29-77	National Council Senior Cit.	240
IL06-0400-201	2-13-78	Progressive Baptist	108
<u>REHABILITATION</u>			<u>258</u>
Section 8-IHDA			36
IL06-H121-111	9-29-77	Webster Apts.	36
Section 312			6
CDBG			166
NHS			46
HOMESTEAD			4
TOTAL			1,435

ASSISTED HOUSING ACCOMPLISHMENTS

FAMILY 1977 HAP (9-16-77 to 9-16-78)

PROJECT NO.	HUD APPROVAL DATE	PROJECT	UNITS
<u>NEW CONSTRUCTION</u>			<u>468</u>
Section 8-HUD			84
IL06-0040-016	8-11-78	Humboldt & Armitage	44
IL06-0040-008	10-3-78	36th & Michigan	40
Section 8-IHDA			384
IL06-H121-113	8-8-78	5500 N. Sheridan	99
IL06-H121-132	9-29-77	West Point Plaza II	126
IL06-H121-133	9-29-77	Paul Stewart IV	159
<u>REHABILITATION</u>			<u>991</u>
Section 8-HUD			511
IL06-0040-001	8-10-78	6901-08 Parnell	34
IL06-0040-002	8-8-78	7200 S. Shore Dr.	40
IL06-0040-005	8-8-78	4826 S. Evans	4
IL06-0040-010	8-11-78	47th & Vincennes	28
IL06-0040-012	8-11-78	4849 N. Magnolia	50
IL06-0040-014	8-14-78	63rd & Greenwood	33
IL06-0040-022	8-11-78	2231-37 N. Kedzie	14
IL06-0040-017	8-11-78	3127 W. Palmer Square	49
IL06-0040-009	9-20-78	104th & Maryland	25
IL06-0040-011	9-21-78	3800 N. Broadway	234
Section 8-IDHA			28
IL06-H121-111	9-29-77	Webster Hotel	28
Section 312			35
CDBG			252
HOMESTEAD			70
NHS			95
TOTAL			1,459

ASSISTED HOUSING ACCOMPLISHMENTS

LARGE FAMILY 1977 (9-16-77 to 9-17-78)

PROJECT NO.	HUD APPROVAL DATE	PROJECT	UNITS
<u>NEW CONSTRUCTION</u>			<u>120</u>
Section 8-HUD			48
IL06-0040-016	8-11-78	Humboldt & Armitage	8
IL06-0040-008	10-3-78	36th & Michigan	40
Section 8-IHDA			72
IL06-H121-113	8-8-78	5500 N. Sheridan	20
IL06-H121-132	9-29-77	West Point Plaza II	24
IL06-H121-133	9-29-77	Paul Stewart IV	28
<u>REHABILITATION</u>			<u>546</u>
Section 8-HUD			204
IL06-0040-001	8-10-78	6901-08 Parnell	7
IL06-0040-002	8-8-78	7200 S. Shore Dr.	9
IL06-0040-003	8-10-78	1126 W. Oakdale	2
IL06-0040-005	8-8-78	4826 S. Evans	4
IL06-0040-010	8-11-78	47th Vincennes	31
IL06-0040-014	8-14-78	63rd & Greenwood	60
IL06-0040-022	8-11-78	2231-37 N. Kedize	6
IL06-0040-021	8-11-78	6146 S. Ingleside	6
IL06-0040-009	9-20-78	104th & Maryland	53
IL06-0040-011	9-21-78	3800 N. Broadway	26
Section 8-IHDA			8
IL06-H121-111	9-29-77	Webster Hotel	8
Section 312			20
CDBG			230
HOMESTEAD			42
NHS			42
<u>EXISTING</u>			<u>111</u>
IL06-E002-006	CHA		111
TOTAL			777

HOUSING ASSISTANCE PLAN

1978

TRANSITION YEAR HAP

CITY OF CHICAGO



MICHAEL A. BILANDIC, MAYOR

EXHIBIT
III

MAY, 1978

REVISED:
SEPTEMBER, 1978

INTRODUCTION

Rules and regulations for Community Development Entitlement Grants, published in the Federal Register (Vol. 43, No. 41) on Wednesday, March 1, 1978 established a new procedure for the Housing Assistance Plan portion of the CD Grant application which will result in a 3 year HAP, supplemented by annual Housing Programs.

In the interim, for Housing Assistance Plans submitted after March 1, 1978 but prior to August 1, 1978 (referred to by HUD as the Transition Year HAP), special provisions are applicable. This interim HAP supercedes or supplants prior year HAP's and the housing goals contained therein. The following is a summary of the special provisions promulgated by HUD which are incorporated in this Housing Assistance Plan.

Applicants are expected to propose one year goals for housing assistance, by household type, which, when combined with all assistance provided since approval of the 1976 HAP, will be in the same proportion as the 1976 three year goals by household type. Applicants are not required to resubmit Tables I and II of the 1976 HAP.

Applicants are required to submit an Annual Housing Action Program for this year (New Table III -- Current Year Goal accompanied by a narrative delineating actions to be taken).

Applicants are required to submit a Table IV (General Locations for Proposed Lower Income Housing).

In the Transition Year HAP a goal may be included for a household type to which a "disproportionate" amount of assistance has been provided, as long as goals for the other household types are increased so that proportionality will be maintained.

ANNUAL GOAL (Transition Year 1978)

The goals for lower income housing assistance proposed in this Transition Year Housing Assistance Plan are designed to complete the requirement that housing assistance provided pursuant to the three year goals of the HAP approved by HUD in 1976 shall be provided in the same proportion as those goals by household type (elderly and handicapped, families and non-elderly individuals, and large families).

In determining appropriate goals for the 1978 Transition Year HAP, all housing provided since the approval of the 1976 HAP has been considered including Section 8, Section 202, Section 236, Section 312, Low Rent Public Housing and the CDBG-funded rehabilitation assistance programs.

In addition to determining the number of units required in order for proportionality to be attained, the distribution of goals by tenure and housing type reflects the distribution of need by tenure and the condition and availability of the housing stock. In addition, the goals proposed are designed to make maximum utilization of all housing resources which may be made available during the program year based upon the best estimates of resources available at the time of preparation of this Housing Assistance Plan.

The City of Chicago requests that all Section 8 assisted housing developments proposed within the corporate limits of the city to be assisted or financed by the Illinois Housing Development Authority, or other agency of the State of Illinois, be submitted for review by the Department of Planning, City and Community Development as provided for under Section 213 of the Housing and Community Development Act of 1974.

A goal of 2917 Section 8 assisted housing units has been set for the transition year in order to achieve the HUD requirement for proportionality. Of that total, 1383 units will be for families and 1534 units for large families.

Last year the HUD allocation plan provided a total of 3631 units for the City of Chicago. It is not likely that this number will be substantially increased in the coming year. Current levels of funding for housing assistance provide little progress toward meeting the needs of the city's lower income residents. Goals have been set for the Transition Year HAP primarily in response to HUD's current concern for proportionality in the attainment of goals for housing assistance. If the 900 units of Section 8 Substantial Rehabilitation are approved by HUD for the Special Procedures Program in Lawndale and South Shore, and if HUD allocates approximately 2900 units of Section 8 assistance through the regular allocation, it will be necessary to reallocate some Section 8 assistance to the Elderly and Handicapped in order to maintain proportionality in line with the 1976 three year goals.

Although one Section 236 project commitment was made by HUD during the 1976-1977 CD Program Year, it is the understanding of the City that resources are generally not available for housing assistance through this program. With this understanding, the Current Year goals do not include any anticipated Section 236 assistance. If the program should be reactivated, housing assistance provided through the Section 236 program should be in conformance with this Housing Assistance Plan.

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
HOUSING ASSISTANCE PLAN
TABLE III. GOALS FOR LOWER INCOME HOUSING ASSISTANCE
CURRENT YEAR GOAL

1. NAME OF APPLICANT City of Chicago		3. <input checked="" type="checkbox"/> ORIGINAL <input type="checkbox"/> AMENDMENT, DATE:		
2. APPLICATION/GRANT NUMBER B - 7 8 - M C - 1 7 - 0 0 0 6		4. PROGRAM YEAR Revised Sept. 1978 FROM: 10/1/78 TO: 9/30/78		
TYPES AND SOURCES OF ASSISTANCE (a)	NUMBER OF HOUSEHOLDS TO BE ASSISTED			
	ALL HOUSEHOLDS (b)	ELDERLY OR HANDICAPPED (1-2 persons) (c)	FAMILY (4 or less persons) (d)	LARGE FAMILY (5 or more persons) (e)
A. NEW RENTAL UNITS				
1. Section 8-HUD	662	0	308	354
2. State Agency—Total (Sum of lines a and b)	650	0	305	345
a. Section 8	650	0	305	345
b. Other	0	0	0	0
3. Other Assisted New Rental Housing (Identify) - Total	0	0	0	0
a. Section 202	0	0	0	0
b.	0	0	0	0
4. Total (Sum of lines 1, 2, and 3)	1,312	0	613	699
B. REHABILITATION OF RENTAL UNITS				
1. Section 8-HUD	660	0	320	340
2. State Agency—Total (Sum of lines a and b)	645	0	300	345
a. Section 8	645	0	300	345
b. Other	0	0	0	0
3. Other Assisted Rehabilitation of Rental Housing (Identify) - Total	325	0	165	160
a. Section 312	25	0	15	10
b. CDBG	300	0	150	150
4. Total (Sum of lines 1, 2, and 3)	1,630	0	785	845
C. EXISTING RENTAL UNITS				
1. Section 8-HUD	300	0	150	150
2. State Agency—Total (Sum of lines a and b)	0	0	0	0
a. Section 8	0	0	0	0
b. Other	0	0	0	0
3. Other Assisted Existing Rental Housing (Identify) - Total	0	0	0	0
a.	0	0	0	0
b.	0	0	0	0
4. Total (Sum of lines 1, 2, and 3)	300	0	150	150
D. REHABILITATION ASSISTANCE TO HOMEOWNERS OR PROSPECTIVE HOMEOWNERS				
1. CD Block Grants	225	0	125	100
2. Homestead	115	0	60	55
3. Other Rehabilitation Assistance to Homeowners or Prospective Homeowners (Identify) - Total	235	0	120	115
a. NHS	200	0	100	100
b. Section 312	35	0	20	15
4. Total (Sum of lines 1, 2, and 3)	575	0	305	270
E. NEW CONSTRUCTION ASSISTANCE TO HOMEOWNERS OR PROSPECTIVE HOMEOWNERS				
1. Section 235	0	0	0	0
2. Other (Identify) - Total	0	0	0	0
a.	0	0	0	0
b.	0	0	0	0
3. Total (Sum of lines 1 and 2)	0	0	0	0
F. ALL HOUSING ASSISTANCE GOALS (Sum of lines A4, B4, C4, D4, and E3)				
	3,817	0	1,853	1,964

NARRATIVE OF ACTIONS TO BE TAKEN TO IMPLEMENT TRANSITION YEAR HAP

On December 27, 1977, a program to stimulate the development of Section 8 housing for families in Chicago was submitted to the HUD Area Office. On January 17, 1978 and April 14, 1978, progress reports were submitted to HUD indicating what had been accomplished toward achieving the elements of the proposed program. The actions now proposed to be taken to implement the Transition Year Housing Assistance Plan are based upon the program submitted in December, 1977. The following is a summary of the activities now proposed:

1. Whenever appropriate, housing developers will be encouraged by the City to utilize the Section 8 Program as part of their housing development plans for both new construction and rehabilitation.
2. A special mailing to developers on the mailing list of the DPCCD Land Disposition Section will be undertaken to publicize the availability of Section 8 funding whenever that occurs. During the last several months, such a mailing was undertaken to notify developers of the IHDA and HUD NOFA's in March and recently a mailing was completed to non-profit organizations interested in the Section 202 program when the NOFA for that program appeared from the HUD office.
3. As a follow up to the Section 8 Housing Conference sponsored by the Department on March 10, 1978 at the Chicago Public Library Cultural Center, additional seminars and discussion sessions will be held to improve communications between the public agencies and the private sector, hopefully, leading to increased production of Section 8 family housing in the city.
4. The Department of Planning, City and Community Development will assist in the development of Section 8 housing by providing

assistance in land acquisition and by making land available in several areas of the city. Priority sites for housing development are located in the following urban renewal areas:

Haskins-Hermitage
Uptown
Evergreen-Sedgwick
Mohawk-North
Chicago-Orleans
Lake-Kedzie
Central West
37th-Wentworth
36th-Michigan
43rd-Vincennes
East Central Englewood
Central Englewood
63rd-Stony Island
Hyde Park-Kenwood
Lawndale-Roosevelt-Kedzie
North Lawndale NSA
49th-Michigan
South Shore-Parkside NSA
87th-Mackinaw

If necessary, the City of Chicago will request an exemption to the provisions of the Gautreaux court orders from the Federal District Court for the construction of family Section 8 units.

5. When urban renewal sites are selected for Section 8 development the City will request pre-approval of these sites in relation to the HUD Site and Neighborhood standards. In this way, developers will not be required to wait for a Notice of Fund Availability to be published by either HUD or IHDA to submit proposals for Section 8 funding.

6. The Department will continue to implement its CDBG funded Demonstration Multi-Family Rehabilitation Grant program with the requirement that property owners set aside up to 40% of the units for Section 8 eligible families.

7. DPCCD has filed eight applications for Urban Development Action Grants, two of which include proposals for Section 8 family housing. The Antioch Missionary Baptist Church proposes to construct approximately 200 units of family housing in the

Englewood Conservation area. The site is presently being acquired with CDBG funds. The other UDAG project would provide for the recycling and rehabilitation of large unused industrial structures in the Pullman Historic Landmark District to provide 400 units of family housing. Section 8 rent assistance would be utilized to achieve an economic mix of families within the Historic District.

8. Applications have been submitted for HUD approval of two areas for the new Section 8 Substantial Rehabilitation Procedures in Neighborhood Strategy Areas. The areas proposed are Parkside in the South Shore Community and a portion of North Lawndale in the Lawndale community. The City hopes to get HUD approval for 400 Section 8 units for Parkside and 500 units for Lawndale.

GENERAL LOCATIONS FOR PROPOSED LOWER INCOME HOUSING

The proposed geographic distribution for Section 8 New Construction and Substantial Rehabilitation is designated on the following tables and map. The recommended geographic allocation distributes Section 8 units into general housing areas and limited housing areas as required by the court orders entered in the Gautreaux litigation.

In addition, the proposed distribution of housing resources is designed to accomplish the following objectives:

1. Further community revitalization, including neighborhood restoration and rehabilitation;
2. Promoting greater choice of housing opportunities for low income persons and avoiding undue concentrations of assisted housing in areas containing a high proportion of low income persons;
3. Assuring the availability of public facilities and services adequate to serve proposed housing developments.

The general locations identified for both new construction and substantial rehabilitation are of sufficient size and number to enable a reasonable degree of flexibility in selecting specific project sites.

The general locations identified contain sufficient properties with units suitable for rehabilitation and available sites for new construction to allow accomplishment of the goals proposed.

In addition to meeting the requirements for geographic distribution identified on the following tables and map, specific proposals for Section 8 assistance will be reviewed by the City for conformance to the site and neighborhood standards established by HUD for these programs.

Within Area IV (Limited Housing Area) several subareas have been designated for priority consideration for use of Section 8 New Construction and Substantial Rehabilitation programs. Use of Section 8 programs is encouraged in these areas to support ongoing programs which are integral parts of neighborhood renewal strategies within these communities.

If the response of private developers for Section 8 housing assistance reflects a demand that is significantly contrary to the established geographic areas, the City of Chicago will review the pending proposals and if appropriate will request Federal concurrence in allocation revisions which more accurately reflect demand for the program.

No geographic allocation has been designated in this plan for the other programs of assistance to lower income households included in the HAP goals (Table III) because they are programs which have established boundaries of eligibility, or are available on a City-wide basis.

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
HOUSING ASSISTANCE PLAN

TABLE IV - GENERAL LOCATIONS FOR PROPOSED LOWER INCOME HOUSING

1. NAME OF APPLICANT CITY OF CHICAGO	3. <input checked="" type="checkbox"/> ORIGINAL <input type="checkbox"/> AMENDMENT, DATE:
2. APPLICATION/GRANT NUMBER 8 - 7 8 - M C - 1 7 - 0 0 0 6	4. PROGRAM YEAR FROM: 10-1-78 TO: 9-30-79

A. IDENTIFY GENERAL LOCATIONS ON MAP IN THIS APPLICATION

1. New Construction: Census Tract Numbers
The attached tables and map describe the geographic allocation of Section 8 housing units for New Construction and Substantial Rehabilitation.

Specific allocations of Section 8 Substantial Rehabilitation are proposed for Parkside in South Shore (400 units) and North Lawndale in Lawndale, (500 units) through the new Section 8 Sub Rehab Neighborhood Strategy Area Program.

In conjunction with pending Urban Development Action Grant applications, 200 units of Section 8 New Construction are allocated to the Englewood Conservation Area and 400 units of Section 8 Substantial Rehabilitation allocated to the Pullman Historic Landmark District.

2. Rehabilitation: Census Tract Numbers
Priority is also to be given to Section 8 housing development in the following Priority Urban Renewal Areas: Haskins-Hermitage; Uptown Conservation Area; Evergreen-Sedgwick; Chicago-Orleans; Mohawk-North; Lake-Kedzie; Central West; 37th-Wentworth; 36th-Michigan; 43rd-Vincennes East Central Englewood; Central Englewood; 63rd-Stony Island; Hyde Park-Kenwood; Roosevelt-Kedzie; 49th-Michigan; and 87th-Mackinaw.

B. EXPLANATION OF SELECTION OF GENERAL LOCATIONS

1. New Construction
General housing areas and limited housing areas have been defined in accordance with the judgement order of July, 1969 entered in the Gautreaux litigation.

Priority Urban Renewal Areas have been selected for specific allocation of Section 8 assistance based upon the special revitalization efforts targeted for these areas.

2. Rehabilitation

PROPOSED 1978 TRANSITION YEAR HAP

GEOGRAPHIC ALLOCATIONS OF SECTION 8 HOUSING UNITS

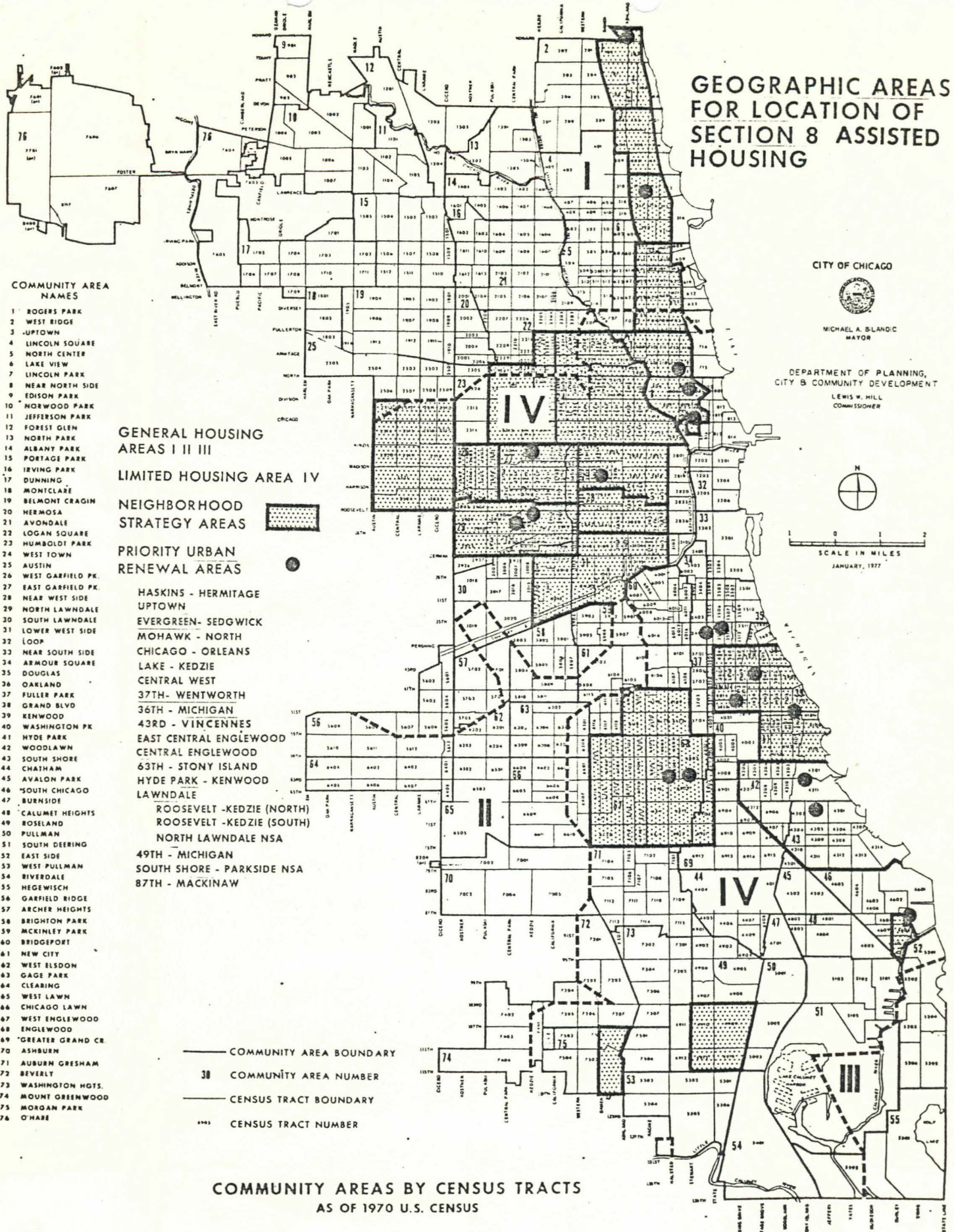
Family Units

	<u>NEW CONST.</u>	<u>REHAB</u>	<u>EXISTING</u>	<u>TOTAL</u>
General Housing Area	<u>790</u>	<u>225</u>	<u>180</u>	<u>1195</u>
Area I	590	225		
Area II	100	0		
Area III	100	0		
Limited Housing Area IV	<u>525</u>	<u>1080</u>	<u>120</u>	<u>1605</u>
Total Family Units	<u>1315</u>	<u>1305</u>	<u>300</u>	<u>2920</u>

Elderly Units (Sec. 202)

	<u>NEW CONST.</u>	<u>REHAB</u>	<u>EXISTING</u>	<u>TOTAL</u>
General Housing	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Area I	0	0		
Area II	0	0		
Area III	0	0		
Limited Housing Area IV	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total Elderly Units	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
GRAND TOTAL	1315	1305	300	2920

GEOGRAPHIC AREAS FOR LOCATION OF SECTION 8 ASSISTED HOUSING



COMMUNITY AREA NAMES

- 1 ROGERS PARK
- 2 WEST RIDGE
- 3 UPTOWN
- 4 LINCOLN SQUARE
- 5 NORTH CENTER
- 6 LAKE VIEW
- 7 LINCOLN PARK
- 8 NEAR NORTH SIDE
- 9 EDISON PARK
- 10 NORWOOD PARK
- 11 JEFFERSON PARK
- 12 FOREST GLEN
- 13 NORTH PARK
- 14 ALBANY PARK
- 15 PORTAGE PARK
- 16 IRVING PARK
- 17 DUNNING
- 18 MONTCLARE
- 19 BELMONT CRAIGH
- 20 HERMOSA
- 21 AVONDALE
- 22 LOGAN SQUARE
- 23 HUMBOLDT PARK
- 24 WEST TOWN
- 25 AUSTIN
- 26 WEST GARFIELD PK.
- 27 EAST GARFIELD PK.
- 28 NEAR WEST SIDE
- 29 NORTH LAWDALE
- 30 SOUTH LAWDALE
- 31 LOWER WEST SIDE
- 32 LOOP
- 33 NEAR SOUTH SIDE
- 34 ARMOUR SQUARE
- 35 DOUGLAS
- 36 OAKLAND
- 37 FULLER PARK
- 38 GRAND BLVD
- 39 KENWOOD
- 40 WASHINGTON PK.
- 41 HYDE PARK
- 42 WOODLAWN
- 43 SOUTH SHORE
- 44 CHATHAM
- 45 AVALON PARK
- 46 SOUTH CHICAGO
- 47 BURNSIDE
- 48 CALUMET HEIGHTS
- 49 ROSELAND
- 50 PULLMAN
- 51 SOUTH DEERING
- 52 EAST SIDE
- 53 WEST PULLMAN
- 54 RIVERDALE
- 55 HEGEWISCH
- 56 GARFIELD RIDGE
- 57 ARCHER HEIGHTS
- 58 BRIGHTON PARK
- 59 MCKINLEY PARK
- 60 BRIDGEPORT
- 61 NEW CITY
- 62 WEST ELSDON
- 63 GAGE PARK
- 64 CLEARING
- 65 WEST LAWN
- 66 CHICAGO LAWN
- 67 WEST ENGLEWOOD
- 68 ENGLEWOOD
- 69 GREATER GRAND CR.
- 70 ASHBURN
- 71 AUBURN GRESHAM
- 72 BEVERLY
- 73 WASHINGTON HGTS.
- 74 MOUNT GREENWOOD
- 75 MORGAN PARK
- 76 O'HARE

GENERAL HOUSING AREAS I II III

LIMITED HOUSING AREA IV

NEIGHBORHOOD STRATEGY AREAS

PRIORITY URBAN RENEWAL AREAS

- HASKINS - HERMITAGE
- UPTOWN
- EVERGREEN- SEDGWICK
- MOHAWK - NORTH
- CHICAGO - ORLEANS
- LAKE - KEDZIE
- CENTRAL WEST
- 37TH - WENTWORTH
- 36TH - MICHIGAN
- 43RD - VINCENNES
- EAST CENTRAL ENGLEWOOD
- CENTRAL ENGLEWOOD
- 63TH - STONY ISLAND
- HYDE PARK - KENWOOD
- LAWDALE
- ROOSEVELT - KEDZIE (NORTH)
- ROOSEVELT - KEDZIE (SOUTH)
- NORTH LAWDALE NSA
- 49TH - MICHIGAN
- SOUTH SHORE - PARKSIDE NSA
- 87TH - MACKINAW

- COMMUNITY AREA BOUNDARY
- 38 COMMUNITY AREA NUMBER
- CENSUS TRACT BOUNDARY
- 4903 CENSUS TRACT NUMBER

COMMUNITY AREAS BY CENSUS TRACTS AS OF 1970 U.S. CENSUS

CITY OF CHICAGO



MICHAEL A. BLANDIC
MAYOR

DEPARTMENT OF PLANNING,
CITY & COMMUNITY DEVELOPMENT
LEWIS W. HILL
COMMISSIONER



1 0 1 2
SCALE IN MILES
JANUARY, 1977

8

10/25/78

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOROTHY GAUTREAUX, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	No.
)	66 C 1459
PATRICIA R. HARRIS, Secretary of)	66 C 1460
of the U. S. Department of)	
Housing and Urban Development)	(Consolidated)
and Chicago Housing Authority,)	
et al.,)	
)	
Defendants.)	
)	

NOTICE OF FILING

- TO:
- Alexander Polikoff, Esq.
109 North Dearborn
Chicago, Illinois 60602
 - Calvin H. Hall, Esq.
22 West Madison Street
Chicago, Illinois 60602
 - Thomas P. Sullivan, Esq.
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219 South Dearborn Street
Chicago, Illinois 60604
 - Richard Flando, Esq.
300 South Wacker Drive
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 - Patrick W. O'Brien, Esq.
231 South LaSalle Street
Chicago, Illinois 60604

PLEASE TAKE NOTICE that on October 24, 1978, I shall file the attached Memorandum of the City of Chicago with Affidavit and supporting documents in opposition to Plaintiffs' Motion for Futher Relief Against Department of Housing and Urban Development with the Clerk for The Honorable John Powers Crowley. United States District Court for the Northern District of Illinois. This memorandum and the separate Memorandum of HUD are filed in lieu of a joint memorandum because of the difficulties of co-ordinating a joint memorandum all revisions of which would require approval of HUD's Washington office.

WILLIAM R. QUINLAN
Corporation Counsel of the
City of Chicago
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Attorney for City of Chicago

Earl L. Neal,
Special Assistant Corporation Counsel
Robert Retke,
Kathleen Ransford,
Assistant Corporation Counsel
of Counsel

CERTIFICATE OF SERVICE

I certify that on October 24, 1978, I served this Notice by mailing a copy together with copies of the pertinent Memorandum, Affidavit and supporting exhibits, to the persons to whom the notice is directed with sufficient first class postage attached and deposited in the U. S. Mail drop in City Hall, Chicago.

ROBERT RETKE,
Attorney