

APPENDIX A: ANTI-POVERTY STRATEGY

The city of Rockford will implement the following activities to reduce the number of area families in poverty through both the Community Development and Human Services Departments and other public entities.

A. Community Development Department

1. CDBG Funding

- a. Implement the Self-Employment Training (SET) Program, which provides free entrepreneurial training to low/moderate-income residents of the city.
- b. Staff boards, which assist those in poverty to help ensure appropriate distribution of funds, such as the FEMA Board.
- c. Continue Focus Area rehabilitation programs in strategic areas and create decent, affordable housing units.
- d. Provide match funds for the City of Rockford Human Services Department's Get the Lead Out! Program to reduce the lead paint hazards in lower income homes in which a child with a high EBL level has been identified.

2. HOME Funding

- a. Continuation of a property standards type program for lower- income households and providing funds to local non-profits who serve persons in need of decent, safe, and affordable housing with any carryover from previous year programming.
- b. Continue to leverage HOME funds with Winnebago County Health Department's lead program.

3. ESGP Funding

- a. Administer the Emergency Solutions Grants Program (formally Emergency Shelter Grants Program), giving priority to projects falling under the category of homeless prevention with program implementation continued as the responsibility of the Human Services Department.

4. Other Funding and Initiatives

- a. Continue to administer the Family Self-Sufficiency Program through the Rockford Housing Authority.
- b. Work with the Rockford Housing Authority to continue to provide subsidized housing for those transitioning from housing assisted through homeless grants.
- c. Continuation of the YouthBuild Program through Comprehensive Community Solutions, Inc. which provides mentoring and employment opportunities to youth.
- d. Provide decent housing and improved neighborhoods through the NSP funding.

B. Human Services Department

1. Continue the Head Start program, which teaches income eligible pre-school children educational skills and social classroom skills. Head Start gets kids on the right track emotionally and educationally. While they are learning, their parents are provided access to employment and social services. Head Start serves over 600 children per year at three Rockford locations. All locations are located in lower-income neighborhoods with two located in public housing developments and noted below:
 - a. Henrietta Site, 200 North Johnston Street
 - b. Fairgrounds Site, 910 Acorn Street (located at a PHA development site)
 - c. Orton Keyes Site, 653 Ranger Road (located at a PHA development site)
2. Community Services assists persons who are homeless or are in danger of becoming homeless through FEMA Emergency Food and Shelter funds, Illinois Department of Human Services Homeless Prevention funds, Community Services Block Grant (CSBG) funds and Rockford Township Condemnation funds. These funds assist low-income persons with one to three month's rent, emergency housing, utility assistance, deposits and mortgage assistance.
3. Community Services provides scholarships to low-income students who are pursuing education and training at Illinois accredited institutions.
4. Continuation of the Summer Feeding program funded by the Illinois State Board of Education, which provides free, nutritious lunches and snacks to eligible children, aged 3-18.
5. The continuation of a partnership with the Illinois Department of Children and Family Services which provides advocacy, counseling, budgeting and support to Norman class families and youth leaving the foster care system.
6. Support and guidance in developing grassroots organizations including faith-based organizations.
7. The provision of grassroots training which provides low-income citizens with the tools necessary to advocate for themselves and their community.
8. Continue to provide intensive, long-term case management services to families and seniors to increase their skills, improve their income and strengthen family connections.
9. Continue administering the Low-Income Heating Energy Assistance Program (LIHEAP). This program assists income eligible households in making an annual one-time payment towards low-income households heating bill. It also assists with the repair/replacement of furnaces. The Energy Division also offers the

Weatherization program, which assists household in making their homes more energy efficient in an effort to reduce heating costs.

10. Continue the Weatherization and the Get the Lead Out! Programs.
11. Continue to administer an Economic Development Loan Program that provides loans to businesses that agree to create jobs for low-income persons. For every \$20,000 loaned, a job must be created that is filled by a low-income person.
12. Offer a new mini-micro loan program to start businesses with 0 percent interest rate for persons who wouldn't qualify under traditional loan programs.
13. Continued support of the Neighborhood Network which is responsible for:
 - a. Coordinating the exchange of information among citizens, neighborhood organizations and City staff, and;
 - b. Providing technical assistance to neighborhood groups and leaders.
16. Continued coordination and support of the Mayor's Task Force on Homelessness which is the coordinating agency for all community organizations serving the homeless.
17. The staffing of Drug Free Rockford which provides prevention education and training to area youth and youth serving organizations on alcohol, tobacco (ATOD) and other drug prevention.
18. Provide support to the Alternative Drug Program and Project Safe Neighborhoods, both of which are operated by local law enforcement by providing resources and case management to early offenders of drug crimes and ex-offenders of violent crimes.
19. Community Services provides funding and staff for Students Working for Excellence Everywhere Program (SWEEP) which provides exterior clean up and minor rehab for low-income, elderly and disabled persons who have been cited for code violations.
20. Continue coordination and Support for the Weed and Seed efforts, which include coordination the rehab of homes in the Weed and Seed area by urban work camps.

APPENDIX B: CITIZEN PARTICIPATION PLAN

CITY OF ROCKFORD COMMUNITY DEVELOPMENT PROGRAMS CITIZEN PARTICIPATION PLAN

Overview

The administration of all Community Development Programs is a function of the Community Development Department granted through a policy directive from the Rockford City Council. Even though the elected City officials have unrestricted responsibility and authority for these Community Development Programs, the City recognizes citizen involvement in the decision making process is of greater benefit to all parties in the development and implementation of each program's goals and objectives.

In order to provide citizens with opportunities to participate in an advisory role in planning, implementing and assessing the Community Development Programs, the City will provide adequate information to citizens; hold public hearings to obtain views of the citizens, and provide citizens an opportunity to comment on the City's community development performance. The Citizen Participation Plan was developed as a mechanism to address those concerns.

Integral to the Citizen Participation Plan is the establishment of the Citizen Participation Committee (CPC). The Committee can be viewed as a formal/structured means of receiving and disseminating information for citizen action and input toward Community Development plans, programs, and activities. The role of the Committee and its composition will be presented later.

Purpose

The purpose of the Citizen Participation Plan is to identify the process, procedures and policies to be followed by the City of Rockford regarding the involvement of citizens in its Community Development Programs (CDP). While the Plan is designed to meet the federal regulations associated with each, it has been expanded beyond those requirements to further enhance citizen participation. Nothing in the Plan, however, shall be construed to restrict the responsibility and authority of the City officials for the development of the application and the execution of its Community Development Programs.

This plan outlines the means by which citizens can actively participate in the CDP process. In all instances, citizen participation will be conducted in an open manner, with freedom of access for all interested persons. Citizens will be provided adequate and timely information that enables them to be meaningfully involved in the CDBG program.

Participation Emphasis

All citizens, particularly low and moderate income persons and persons/residents of blighted neighborhoods, shall be encouraged to submit views and proposals regarding the City's Community Development Programs.

Additionally, minorities and non English speaking persons as well as mobility, visually and hearing impaired persons will be encouraged to participate. The staff of the Community Development Department will be responsible for providing necessary technical assistance

to groups and/or individuals that request assistance in developing proposals and statements of views. Further, staff may assist citizens in organizing neighborhood and project area organizations in carrying out Community Development Program activities.

Citizens may submit their views and proposals, 1) directly to the City via the Department of Community Development; 2) to recognized neighborhood groups/associations, non profit community service organizations; 3) to the Citizen Participation Committee; 4) and/or at public hearings. Timely responses to all proposals will be made, including written responses to written proposals stating the reasons for the action taken by the City on the proposal. The City will make every effort to respond within 30 days of the receipt of the request, unless otherwise designated.

Citizen Participation Committee (CPC)

The CPC will be central to the implementation of the Citizen Participation Plan. The Citizen Participation Committee will be appointed by the Mayor with the consent of the City Council. The Committee will be expected to function as the formal/structured means of receiving and disseminating information for citizen input and action both community wide and at a neighborhood level, toward the planning, implementation and evaluation of community development programs. Additionally, the Committee will be the vehicle to ensure continuity of citizen involvement through all stages of the Community Development Programs.

The Committee will consist of eleven members. Terms of membership shall be as follows: five positions - 3 year terms; six positions - 2 year terms. Members shall serve until their successors are appointed; they resign.

All members of the Committee must be residents of the City of Rockford. Membership is not limited to those who reside in lower income census tracts. However, since most activities are either directed to such areas or benefit residents of such areas, residency is strongly encouraged.

With initial and each subsequent appointment extreme efforts should be taken to reflect representing low to moderate income, minority, and of areas where significant activities are proposed. Additionally, the elderly, persons with disabilities, the business community, and civic groups who are concerned about the program should have representation. Discrimination because of race, creed, color, religion, national origin, sex or income in making appointments is prohibited.

The Mayor will make appointment to the CPC from a list of candidates submitted by the Citizen Participation Committee, ad hoc citizen groups, neighborhood groups, community service organizations serving low to moderate income persons, elderly, and/or persons with disabilities as well as the community at large. Vacancies, expirations and committee replacements shall be made public through the Community Development Department and/or interagency announcements. All members of the CPC shall have resumes on file which are available for public review if requested.

Although no formal committee structure exists, ad hoc committees will be formed on an as needed basis. Formal recommendations of the CPC will require a majority vote.

The Citizen Participation Committee will minimally be involved in:

Program Development

The CPC will provide advisory input toward decisions affecting priority setting and housing and community development needs identification.

The Five Year Consolidated Plan and Strategy; the Annual Plan; Special CDP Project reviews; other strategic plans and substantial changes resulting in amending the Annual Plan, dollar allocations and/or targeted population or geographic area.

Performance Assessment

The CPC will be involved in assessing and providing comments regarding the City's community development performance. The formal mechanism for assessing and documenting performance shall be the Consolidated Annual Performance and Evaluation report or CAPER. CPC members will provide input into the preparation of the CAPER prior to submittal to the Planning and Development Committee of the City Council for approval.

Public Hearings and Notices

A minimum of two public hearings will be held throughout the program year. Each of the hearing arrangements and timing will be so as to allow city wide participation including persons with disabilities. Additionally when it is evident a significant number of non English speaking residents will be present arrangements will be made to have an interpreter present. Both public hearing(s) will take place prior to the major yearly application submission. The first hearing will be held to provide a review of the proceeding year's CDP accomplishments and to gain input on what activities should cease, be continued or new ones to be proposed. The second present a plan of activities for the new program year taking into account the input from previous hearing. Notice of public hearing will minimally be made via the media.

The purpose of the public hearings will be to make adequate information available to citizens concerning: 1) the amounts of funds available; 2) the range of allowable activities; 3) estimated amount of funds proposed for activities that meet the national objective of benefit to low and moderate income persons; 4) proposed activities likely to result in displacement and plans for minimizing displacement; 5) the types and levels of assistance available to persons displaced by CDP funded activities; 6) the application process; 7) past or last annual assessments of performance; 8) the role of citizens in the application/evaluation process and 9) other important program information. Additionally, the hearing will allow for obtaining of views from citizens on the City's community development needs.

A notice of availability of a proposed plan for public review and comment will be published in the local newspaper(s) prior to the submittal to HUD of the yearly annual plan submission. This notice will outline the 30 day comment period. Comments made by citizens resulting from the publication and the public hearing(s) will be considered at the CPC meeting prior to final submission.

Notice and opportunity for citizen comment on proposed activities not previously described in the Annual Plan and activities which are proposed to be deleted or substantially changed in terms of purpose, scope, location or beneficiaries will be provided. The criteria the City will use to determine what constitutes a substantial change will be increases or decreases in grant dollars or activity dollars that cumulatively totals

twenty percent that program year's grant allocation.

The City shall also make copies of the Consolidated Annual Performance and Evaluation Report (CAPER) available to the public for review and comment for the required 15 days. This may be done per publication of the report within local newspapers with a request for comments. A third public hearing may be conducted to receive citizen feedback regarding the CAPER and/or special projects. The availability of the performance and evaluation information will be made known per newspaper publication and will be provided in sufficient time to permit comments prior to submission of the report to the Department of Housing and Urban Development.

Information announcing public hearings and significant events in the Community Development process will be published in the local newspaper(s) at least 3 days prior to the meeting. The notice will contain:

- 1) Date
- 2) Time
- 3) Place
- 4) Topic(s) to be discussed.

Information can be available on the City of Rockford's web site, at main and neighborhood libraries at same time as newspaper publications.

Nothing in the above shall prevent the City from holding CPC meetings and public hearings concurrently.

Amendments

As specified in CDBG regulations [Title 24 of the Code of Federal Regulations, Part 91.505(a)], the City of Rockford shall amend the consolidated Plan when it:

- Changes allocation priorities or funds distribution method
- Revises policies, data or goals
- Modifies the purpose, scope, location, beneficiaries or funding of an activity

Substantial Amendments

The City of Rockford has determined that an amendment is substantial when:

- The use of CDBG funds is changed from one eligible activity to another and such changes represent twenty percent or more of the original budget
- A new activity is proposed that is not contained in the annual action plan

The CDP will follow the normal the same public notification for a substantial amendment as is for the regular yearly annual plan submissions.

Standard Amendments

"Standard amendments" are those that are not considered substantial in nature. Thus they do not require in depth citizen participation.

Activities Exempt from Substantial Amendment Citizen Participation Requirements

Urgent Needs

It may be necessary to amend the consolidated plan in the event of an emergency such as a natural disaster. These amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet community development needs that have a particular urgency. Therefore, the City of Rockford may utilize CDBG or HOME funds to meet an urgent need without the normal public comment period, which is otherwise required for substantial amendments.

To comply with the national objective of meeting community development needs having a particular urgency, an activity will alleviate existing conditions that the City of Rockford certifies:

- Pose a serious and immediate threat to the health and welfare of the community
- Are of recent origin or recently became urgent
- The City is unable to finance the activity on its own
- Other resources of funding are not available to carry out the activity

A condition will generally be considered to be of recent origin if it is developed or became critical within 18 months preceding the City's certification.

Citizen Participation Records & Information

The Community Development Department will be responsible for the maintenance of records of citizen participation activities. The records will be maintained for each program year for a period of three years after the closing date of the program year. The records will be available for review in the Department's office upon request during normal working hours. Documents to be maintained will include: 1) all mailing and promotional material; 2) records of hearings and meetings; 3) all key documents, including all prior Annual Plans, letters of approval, grant agreements, the Citizen Participation Plan, performance reports, evaluation reports, other reports required by HUD; 4) copies of regulations and assurances governing the program; 5) documents regarding other important program requirements, such as contracting procedures, environmental policies, fair housing and other equal opportunity requirements and relocation provisions.

The availability of these records and information shall be consistent with applicable State and local laws regarding personal privacy and obligations of confidentiality.

Grievance, Complaints and Objections

Any person or group feeling aggrieved in connection with the equal opportunity requirements of the Housing & Community Development Act of 1974 as amended with respect to any portion of the local Community Development Program or any of its project activities shall present those grievances in written form to the Director of the City of Rockford's Department of Community Development. The director will make every effort to provide a written decision on the grievance within 15 working days of a written complaint. If the aggrieved person feels the decision by the director is not acceptable, they may submit the written complaint to the Mayor of the City of Rockford. The Mayor will attempt to respond in writing within 15 days of receipt of the written complaint.

If the persons submitting the grievance continues to feel unsatisfied, the Department will assist them in pursuing to submit and have their grievance heard by the Department of Housing and Urban Development. The area office, the regional office, and finally the central office will be exhausted in that order. The decision of the central office of the Department of Housing and Urban Development will be final.

A record of each grievance received by the Department's director will be maintained. Included within the record will be:

- 1) Name of person or persons alleging grievance.
- 2) Date of receipt.
- 3) Nature of the grievance.
- 4) Action taken by the Department.
- 5) Action taken by the local governing body.
- 6) Final disposition of the grievance.

Programs currently affected by the CP plan

Community Development Block Grant (CDBG)
HOME Investment Partnerships (HOME)
American Dream Downpayment Initiative (ADDI)
Emergency Shelter Grant (ESG)
Housing opportunities for Persons with AIDS (HOPWA)

APPENDIX C: OVERCOMING GAPS IN THE INSTITUTIONAL STRUCTURE

ASSESSMENT OF STRENGTHS AND WEAKNESSES

The primary strengths of the institutional structures are the relationships among the institutions already in existence, and the fact that these efforts are supported at the highest levels of institutions involved, both public and private.

The weaknesses, or gaps, in the institutional structure continue to exist in the following areas:

- Insufficient resources to meet needs at all levels, including housing, social services, and mental and physical care;
- A need to build upon the willingness of the local real estate and financial community to participate in programs that assist the very low end of the price range.

It is not perceived that these gaps could cause an individual or family to become homeless; however, gaps may become contributing factors in such an occurrence.

STRATEGY TO OVERCOME GAPS

The City will continue to promote coordination in the identification of resources and implementation of programs to meet needs. This would provide a more efficient means of providing services and would reduce any overlap that may exist.

The City will continue its efforts to strengthen the existing nonprofits by providing technical resources and access to resources, while fostering the development of new resources to serve specific areas and populations. The City will continue to promote coordination between local realtors and lenders to increase the effectiveness of service to low-income potential homeowners.

REDUCTION OF BARRIERS

Overall barriers to affordable housing and homeownership will be addressed by the City through the continuation of programs such as the American Dream Downpayment Initiative, Homestead Partnership Program, the West Side Alive Program, the HELP Program and the Assist Bond program.

APPENDIX D: NEIGHBORHOOD STABILIZATION PROGRAM

NEIGHBORHOOD STABILIZATION PROGRAM

In 2008, HUD established a new housing program entitled the Neighborhood Stabilization Program (NSP). Its intent was to provide resources to communities that may have been adversely affected by the downturn in the nation's economy and experienced unusually high levels of foreclosure and abandonment.

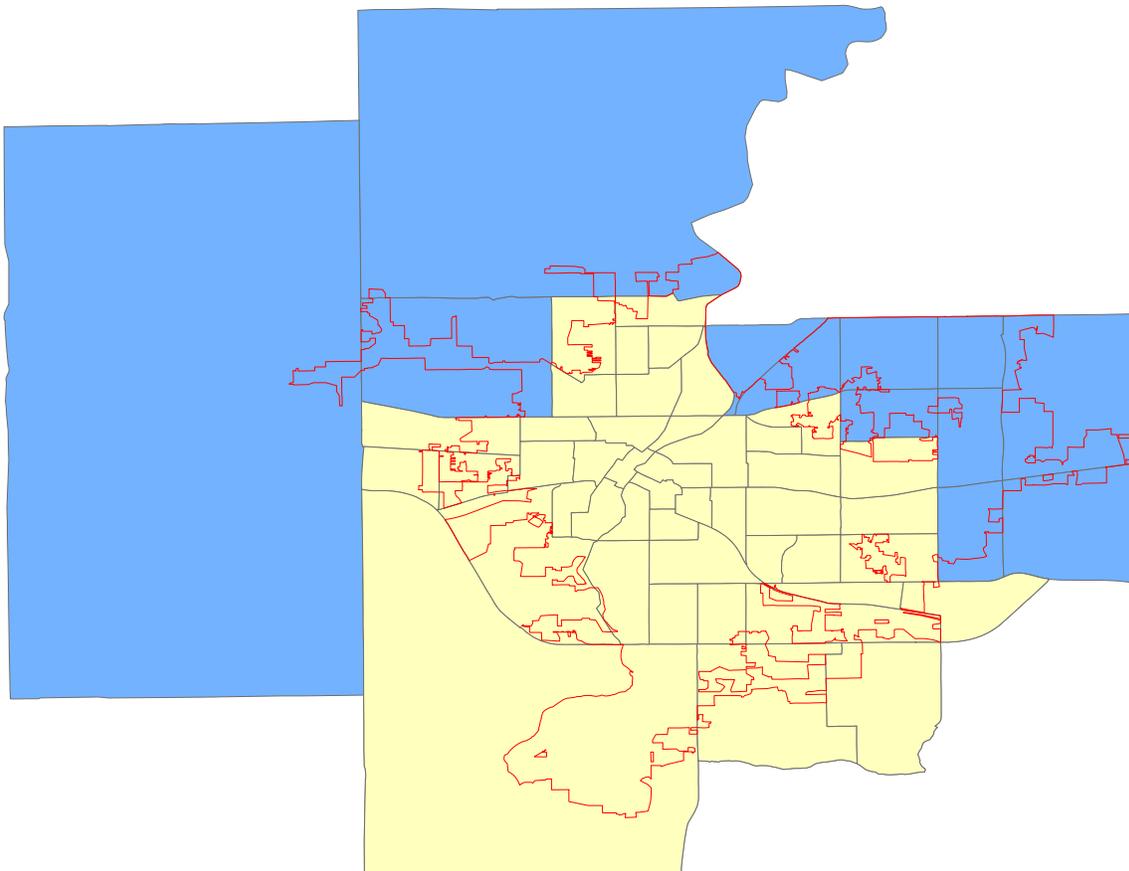
Foreclosure Risks in Rockford

HUD released several types of information useful in evaluating in very broad terms a community's foreclosure risk in this uncertain economic environment. This information was intended to help states and units of local government to carefully plan how to best allocate these new resources as well as helping local communities in directing these resources.⁷⁹ Five geographic maps supporting this information are presented on the following five pages. However, the topics are defined as follows:

- **NSP Qualifying Census Tracts:** - percent of persons estimated to be less than 120 percent of Area Median Income in the area. Qualifying tracts are those with 51 percent or more of the households satisfying this criteria.
- **Estimated Foreclosure Abandonment Risk Score:** a score of 1 to 10, where 10 indicates that the area is in the highest 10 percent of risk nationwide for foreclosure and abandonment based on the combination of HUD's foreclosure risk estimate and vacancy rate. 1 indicates the lowest risk.
- **HMDA High Cost Loan Rate:** Percent of conventional loans made between 2004 and 2006 from Home Mortgage Disclosure Act data where the rate spread is 3 percentage points above the Treasury security of comparable maturity. Calculated at Census Tract level.
- **Predicted 18 Month Underlying Problem Foreclosure Rate:** HUD model, estimated count of foreclosure starts over 18 months through June 2008 divided by estimated number of mortgages times 100. Calculated at Census Tract level.
- **USPS Residential Vacancy Rate:** United States Postal Service data from June 2008 on residential addresses vacant 90-days or longer divided by total residential addresses. Calculated at Census Tract level.

⁷⁹ <http://www.huduse.org/datasets/nsp.html>

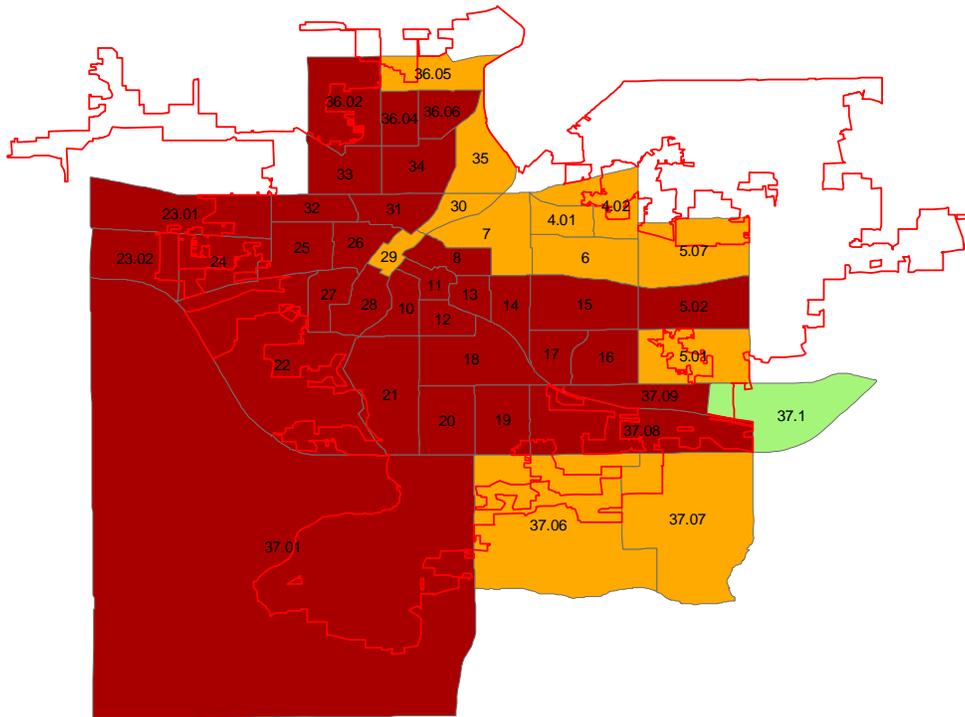
Map D.1
NSP Qualifying Census Tracts
Determined by 51.0 Percent or More of the Population Earning Under 120 Percent of AMI
City of Rockford
HUD NSP Data



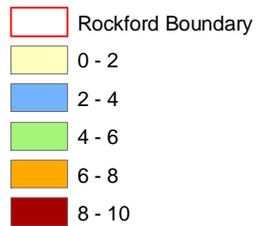
Qualifying Census Tracts

-  Rockford Boundary
-  Qualified Census Tracts
-  Unqualified Census Tracts

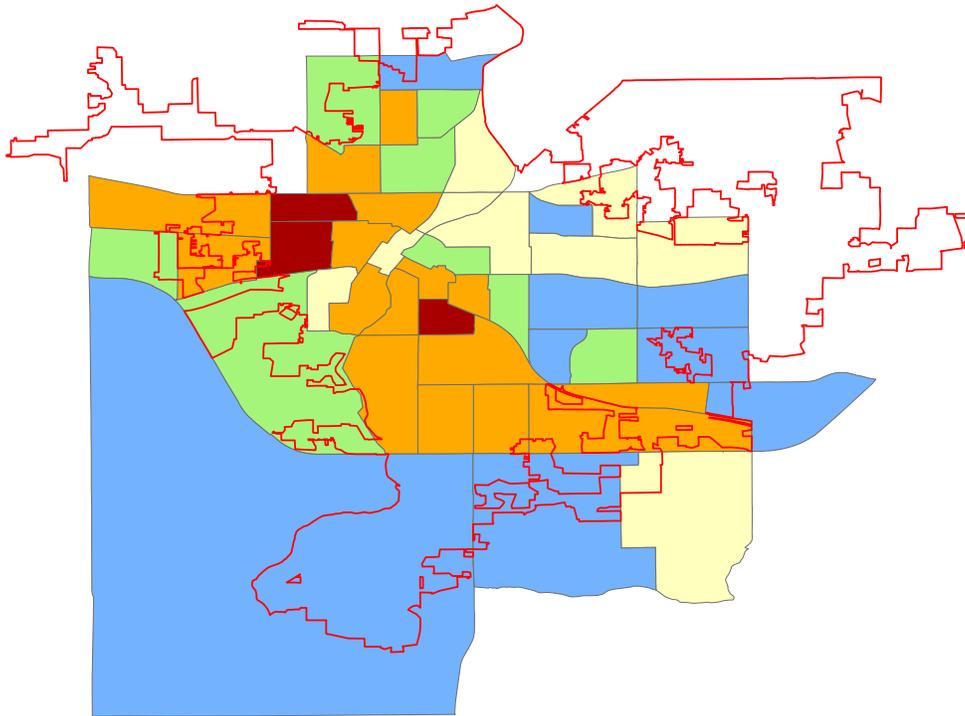
Map D.2
Estimated Foreclosure Abandonment Risk Score
City of Rockford
HUD NSP Data



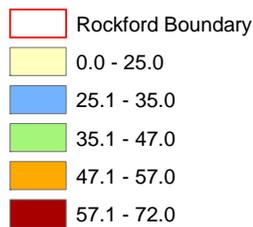
Estimated Foreclosure Abandonment Risk Score



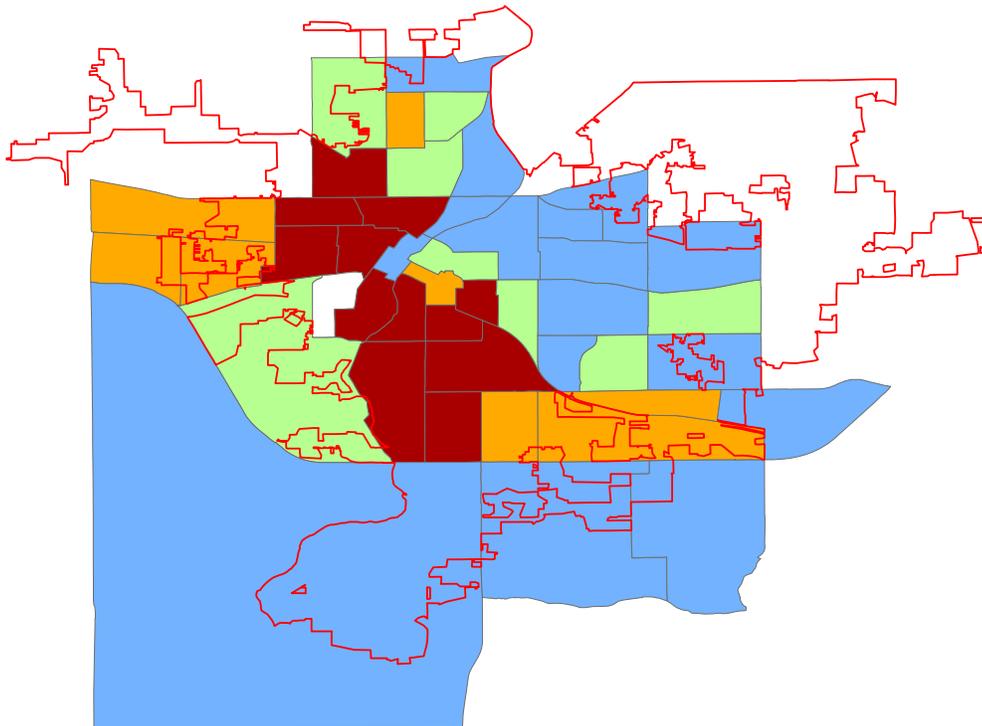
Map D.3
HMDA High Cost Loan Rate by NSP Qualifying Census Tract
City of Rockford
HUD NSP Data



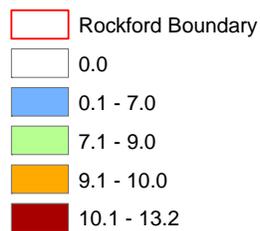
HMDA High Cost Loan Rate by Qualifying Census Tract



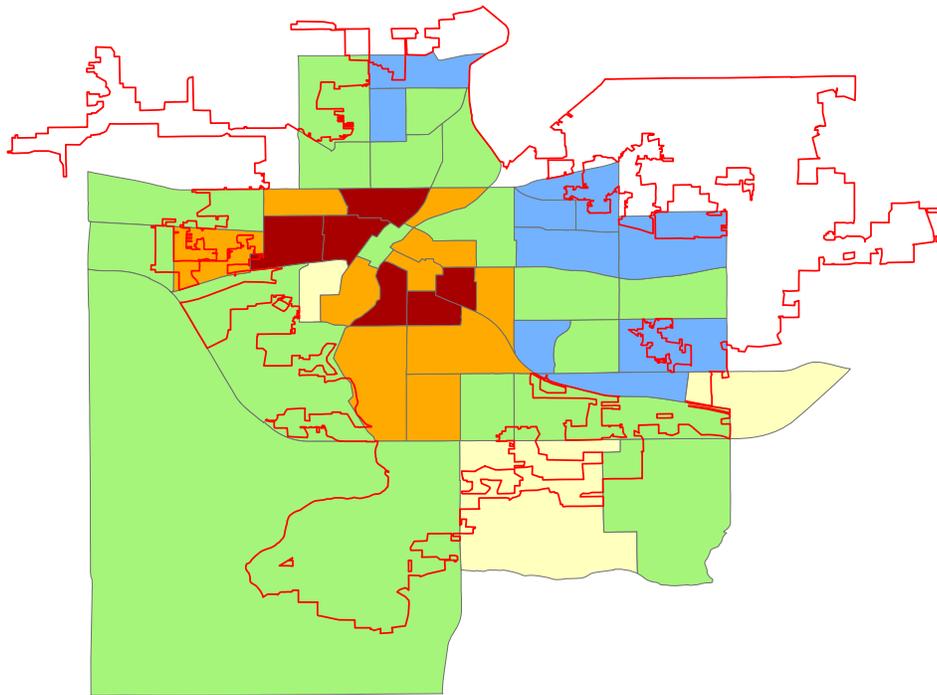
Map D.4
Predicted 18 Month Underlying Problem Foreclosure Rate by NSP Qualifying Census Tract
City of Rockford
HUD NSP Data



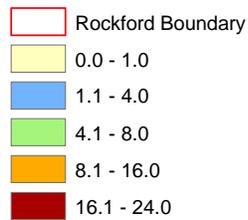
**Predicted 18 Month Underlying Problem Foreclosure Rate
by Qualifying Census Tract**



Map D.5
USPS Residential Vacancy Rate by NSP Qualifying Census Tract
City of Rockford
HUD NSP Data



USPS Residential Vacancy Rate by Qualifying Census Tract



APPENDIX E: GLOSSARY

Accessibility All new construction of covered multifamily buildings must include certain features of accessible and adaptable design. Units covered are all those in buildings with four or more units and one or more elevators, and all ground floor units in buildings without elevators.

Action Plan The Action Plan includes the following: An application for federal funds under HUD's formula grant programs (CDBG, ESG, HOME); Identification of federal and other resources expected to be used to address the priority needs and specific objectives in the strategic plan; Activities to be undertaken including the following; Activities to address Homeless and other special needs (persons with mental, physical or developmental disabilities, battered and abused spouses, victims of domestic violence, etc.); Activities to address other Actions (affordable housing, lead-based paint hazards, poverty reduction, public housing improvements, etc); and lastly; A description of the areas targeted given the rationale for the priorities for allocating investment geographically.

Affordable Housing That housing within the community which is decent and safe, either newly constructed or rehabilitated, that is occupied by and affordable to households whose income is very low, low, or moderate. Such housing may be ownership or rental, single family or multi-family, short-term or permanent. Achieving affordable housing often requires financial assistance from various public and private sources and agencies.

Agency Any department, agency, commission, authority, administration, board, or other independent establishment in the executive branch of the government, including any corporation wholly or partly owned by the United States that is an independent instrumentality of the United States, not including the municipal government of the District of Columbia.

Brownsfield Economic Development Initiative (BEDI) Grant Program BEDI is designed to help cities redevelop abandoned, idled, or underutilized industrial and commercial properties and facilities where expansion or redevelopment is complicated by real or perceived environmental contamination e.g., brownfields. BEDI accomplishes this by providing funding to local governments to be used in conjunction with Section 108 loan guarantees to finance redevelopment of brownfields sites. BEDI-funded projects must meet one of the CDBG program's national objectives.

Certification A written assertion based on supporting evidence that must be kept available for inspection by HUD, by the Inspector General of HUD, and by the public. The assertion shall be deemed to be accurate unless HUD determines otherwise, after inspecting the evidence and providing due notice and opportunity for comment.

Community Development Block Grant Program (CDBG) A Community Development Block Grant is a federal grant to states, counties or cities. It is used for housing and

community development including housing construction and rehabilitation, economic development, and public services which benefit low- and moderate- income people. Grant funds can also be used to fund activities which eliminate slums and blight or meet urgent needs. CDBG-R refers funds granted through the American Recovery and Reinvestment Act of 2009.

Community and Housing Development Organization (CHDO) A federally defined type of nonprofit housing provider that must receive a minimum of 15 percent of all Federal HOME Investment Partnership funds. The primary difference between CHDO and other nonprofits is the level of low-income residents' participation on the Board of Directors.

Comprehensive Grant Program (CGP) HUD grant program via an annual formula to large public housing authorities to modernize public housing units.

Consolidated Annual Performance and Evaluation Performance Report (CAPER) The CAPER allows HUD, local officials, and the public to evaluate the grantees' overall performance, including whether activities and strategies undertaken during the preceding year actually made an impact on the goals and needs identified in the Consolidated Plan.

Consolidated Plan The Consolidated Plan services four separate, but integrated functions. The Consolidated Plan is: a planning document for the jurisdiction which builds on a participatory process with County residents; an application for federal funds under HUD's formula grant programs which are: CDBG, HOME, ESG, HOPWA; a three-year strategy to be followed in carrying out HUD programs; and lastly, an action plan describing individuals activities to be implemented.

Cost Burden The extent to which gross housing costs, including utility costs, exceeds 30 percent of gross income, based on data available from the U.S. Census Bureau.

Economic Development Initiative (EDI) Grant Program EDI is designed to enable local governments to enhance both the security of loans guaranteed through HUD's Section 108 Loan Guarantee Program and the feasibility of the economic development and revitalization projects that Section 108 guarantees finance. EDI accomplishes this by providing grants to local governments to be used in conjunction with Section 108 loan guarantees. A locality may use the grant to provide additional security for the loan (for example, as a loss reserve), thereby reducing the exposure of its CDBG funds (which by law must be pledged as security for the loan guarantees). A locality may also use the EDI grant to pay for costs associated with the project, thereby enhancing the feasibility of the 108-assisted portion of the project. EDI-funded projects must meet one of the CDBG program's national objectives.

Elderly: The CDBG low- and moderate-income limited clientele national objective at 570.208(a)(2)(i)(A) includes the elderly as a presumptive group. However, the CDBG

regulations do not define the term "elderly". Therefore, a grantee can use its own definition of elderly for non-housing activities. As such, the County defines elderly as 55 years of age or older. With regard to housing activities, the Consolidated Plan requires identification of housing needs for various groups, including the elderly, which is defined as 62 years of age or older at 24 CFR 91.5 and 24 CFR 5.100. Because of this, housing activities to be counted toward meeting a Consolidated Plan goal of housing for the elderly must use the definition in 24 CFR 5.100, 62 years or older.

Emergency Shelter Grant (ESG) Emergency Shelter Grant Program is a federally funded program designed to help, improve and maintain the quality of existing emergency shelters for the homeless. ESG helps emergency shelters meet the costs of operating emergency shelters and of providing certain essential social services to homeless individuals so that these persons have access to a safe and sanitary shelter, and to the supportive services and other kinds of assistance they need to improve their situations. The program is also intended to prevent the increase of homelessness through the funding of preventive programs and activities.

Emergency Shelter Any facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless in general or for specific populations of the homeless.

Entitlement An underlying formula governing the allocation of Block Grant funds to eligible recipients. Entitlement grants are provided to larger urban cities (i.e. population greater than 50,000) and larger urban counties (greater than 200,000).

Federal National Mortgage Association (Fannie Mae) A federally chartered, stockholder owned corporation which supports the secondary market for both conventional mortgages and mortgages insured by the FHA and guaranteed by VA.

Financing Functions necessary to provide the financial resources to fund government operations and federal assistance including the functions of taxation, fee and revenue generation, public debt, deposit funds, and intra governmental collections.

First-time Homebuyer An individual or family who has not owned a home during the three-year period preceding the assisted purchase of a home that must be occupied as the principal residence of the homebuyer. Any individual who is a displaced homemaker or a single parent may not be excluded from consideration as a first-time homebuyer on the basis that the individual, while a homemaker or married, owned a home with his or her spouse or resided in a home owned by the spouse.

Fiscal Year Any yearly accounting period, regardless of its relationship to a calendar year.

Full Time Equivalent (FTE) One FTE is 2,080 hours of paid employment. The number of FTEs is derived by summing the total number of hours (for which included categories of employees) are paid by the appropriate categories of employees and dividing by 2,080 hours (one work-year). Appropriate categories include, but are not limited to, overtime hours, hours for full-time permanent employees, temporary employees, and intermittent employees who may not have been paid for an entire reporting period.

Grant A federal grant may be defined as a form of assistance authorized by statute in which a federal agency (grantor) transfers something of value to a party (the grantee) usually, but not always, outside the federal government, for a purpose, undertaking, or activity of the grantee which the government has chosen to assist, to be carried out without substantial involvement on the part of the federal government. The “thing of value” is usually money, but may, depending on the program legislation, also include property or services. The grantee, again depending on the program legislation, may be a state or local government, a nonprofit organization, or a private individual or business entity.

HOME The Home Investment Partnership Program, which is authorized by Title II of the National Affordable Housing Act. This federally funded program is designed to expand the housing, for very low-income people. And, to make new construction, rehabilitation, substantial rehabilitation, and acquisition of such housing feasible, through partnerships among the federal government, states and units of general local government, private industry, and nonprofit organizations able to utilize effectively all available resources.

HOME Funds Funds made available under the HOME Program through allocations and reallocations, plus all repayments and interest or other return on the investment of these funds.

Homeless Family Family that includes at least one parent or guardian and one child under the age of 18, a homeless pregnant woman, or a homeless person in the process of securing legal custody of a person under the age of 18.

Homeless Individual An unaccompanied youth (18 years or younger) or an adult (18 years or older) without children who is homeless (not imprisoned or otherwise detained pursuant to an Act of Congress or a State law), including the following:

- 1) An individual who lacks a fixed, regular, and adequate nighttime residence; and
- 2) An individual who has a primary nighttime residence that is:
 - i) A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
 - ii) An institution that provides a temporary residence for individuals intended to be institutionalized; or
 - iii) A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

Homeless Subpopulation Include but are not limited to the following categories of homeless persons: severely mentally ill only, alcohol/drug addicted only, severely mentally ill and alcohol/drug addicted, fleeing domestic violence, youth and persons with HIV/AIDS.

HOPWA Housing Opportunities for People With AIDS is a federal program designed to provide States and localities with resources and incentives to devise long-term comprehensive strategies for meeting the housing needs of persons with acquired immunodeficiency syndrome (AIDS) or related diseases and their families. The program authorizes entitlement grants and competitively awarded grants for housing assistance and services.

Household Household means all the persons who occupy a housing unit. The occupants may be single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

HUD Created as part of President Lyndon B. Johnson's War on Poverty, the Department of Housing and Urban Development (HUD) was established as a Cabinet Department by the Department of Housing and Urban Development Act (42 U.S.C. 3532-3537), effective November 9, 1965. It consolidated a number of other older federal agencies. The Department of Housing and Urban Development is the Federal agency responsible for national policy and programs that: address America's housing needs; improve and develop the Nation's communities; and enforce fair housing laws. HUD's mission is helping create a decent home and suitable living environment for all Americans. It has given America's cities a strong national voice at the Cabinet level.

HUD Income Levels Income levels serve as eligibility criteria for households participating in federally funded programs.

Extremely Low-income Family whose income is between 0 and 30 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 30 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Low-income Low-income families whose income does not exceed 50 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 50 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Middle Income Family whose is between 80 percent and 95 percent of the median area income for the area, as determined by HUD, with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 95 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Moderate-income Family whose income does not exceed 80 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Jurisdiction A State or unit of general local government.

Large Family Family of five or more persons.

Lead-based paint hazards Any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, lead-contaminated pain that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects as established by the appropriate Federal agency.

Letter of Credit Line of credit to a grant recipient established at a time of approval of application.

Liability Assets owed for items received, services received, assets acquired, construction performed (regardless of whether invoices have been received), an amount received but not yet earned, or other expenses incurred.

Neighborhood Stabilization Program (NSP) Created to aid communities affected by foreclosure and abandonment through purchase and redevelopment. NSP1 refers to grants to state and local governments given on a formula basis and authorized under Division B, Title III of the Housing and Economic Recovery Act of 2008. NSP2 refers to funds allocated to states, local governments, nonprofits and consortiums on a competitive basis through funds authorized from the American Recovery and Reinvestment Act of 2009.

Overcrowded For purposes of describing relative housing needs, a housing unit containing more than one person per room, as defined by U.S. Census Bureau, for which the Census Bureau makes data available.

Person with a Disability A person who is determined to:

- 1) Have a physical, mental or emotional impairment that:
 - i) Is expected to be of long-continued and indefinite duration;
 - ii) Substantially impedes his or her ability to live independently; and
 - iii) Is of such a nature that the ability could be improved by more suitable housing conditions;

Or

- 2) Have a developmental disability, as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001-6007); or
- 3) Be the surviving member or members of any family that had been living in an assisted unit with the deceased member of the family who had a disability at the time of his or her death.

Private Non-profit Organization A secular or religious organization described in section 501 (c) of the Internal Revenue Code of 1988 which: (a) is exempt from taxation under subtitle A of the Code; (b) has an accounting system and a voluntary board; and (c) practices nondiscrimination in the provision of assistance.

Program An organized set of activities directed toward a common purpose or goal that an agency undertakes or proposes to carry out its responsibilities.

Program Income Program income is the gross income received by the recipient and its subrecipients* directly generated from the use of CDBG funds. For those program income-generating activities that are only partially assisted with CDBG funds, such income is prorated to reflect percentage of CDBG funds that were used. Reference 24 CFR 570.500(a).

Examples: (Note: This list is NOT exclusive and therefore other types of funds may also constitute CDBG program income.)

- proceeds from the disposition by sale or long-term lease (15 years or more) of real property purchased or improved with CDBG funds.
- proceeds from the disposition of equipment bought with CDBG funds.
- gross income from the use or rental of real property that has been constructed or improved with CDBG funds and that is owned (in whole or in part) by the recipient or subrecipient. Costs incidental to the generation of the income are deducted from the gross income.
- payments of principal and interest on loans made using CDBG funds.
- proceeds from the sale of loans made with CDBG funds.
- proceeds from the sale of obligations secured by loans made with CDBG funds.
- any interest earned on funds held in a revolving fund account.
- any interest earned on program income pending its disposition.
- funds collected through special assessments that are made against properties owned and occupied by non-low and moderate- income households where the assessments have been made to recover some or all of the CDBG portion of a public improvement.

Reference: 570.500(a)(1)

Program income does not include the following examples:

- interest earned on grant advances from the U.S. Treasury. Any interest earned on grant advances is required to be returned to the U.S. Treasury.
- proceeds from fund-raising activities carried out by subrecipients that are receiving CDBG assistance to implement eligible activities.
- funds collected through special assessments that have been made to recover the non-CDBG portion of a public improvement.
- proceeds from the disposition by the grantee of real property that has been acquired or improved with CDBG funds when the disposition occurs after grant closeout for entitlement grantees.
- proceeds from the disposition of real property that has been acquired or improved with CDBG funds where the disposition occurs within a five year period (or more if so determined by the grantee) after the expiration of the agreement between the grantee and subrecipient for that specific agreement where the CDBG funds were provided for the acquisition or improvement of the subject property.

Note: This list is not all-inclusive.

****Subrecipient** means a public or private nonprofit agency, authority, or organization or an authorized for-profit entity receiving CDBG funds from the recipient or another subrecipient to undertake activities eligible for such assistance. The term excludes an entity receiving CDBG funds from the recipient unless the grantee explicitly designates it as a subrecipient. The term includes a public agency designated by a unit of general local government to receive a loan guarantee, but does not include contractors providing supplies, equipment, construction, or services subject to the procurement requirements as applicable.*

Project A planned undertaking of something to be accomplished, produced, or constructed, having a finite beginning and finite end. Examples are a construction project or a research and development project.

Rehabilitation Labor, materials, tools, and other costs of improving buildings, including repair directed toward an accumulation of deferred maintenance; replacement of principal fixtures and components of existing buildings; installation of security devices; and improvement through alterations or incidental additions to, or enhancement of, existing buildings, including improvements to increase the efficient use of energy in buildings, and structural changes necessary to make the structure accessible for persons with physical handicaps.

Rehabilitation also includes the conversion of a building to an emergency shelter for the homeless, where the cost of conversion and any rehabilitation costs do not exceed 75 percent of the value of the building before conversion. Rehabilitation must meet local government safety and sanitation standards.

For projects of 15 or more units where rehabilitation costs are 75 percent or more of the replacement cost of the building, that project must meet the accessibility requirement of Section 504 of the Rehabilitation Act of 1973; or where rehabilitation costs are less than 75 percent of the replacement cost of the building, that project must meet the requirements of 24 CFR 8.23b.

Rental Assistance Rental assistance payments provided as either project-based rental assistance or tenant-based rental assistance. Otherwise known as the Section 8 Rental Assistance Payments Program and variations thereof.

Renovation Rehabilitation that involves costs of 75 percent or less of the value of the building before rehabilitation.

Request for Proposals (RFP) A RFP is the instrument used to solicit proposals/offers for proposed contracts using the negotiated procurement method.

Section 108 Loan Guarantee Program The Section 108 Loan Guarantee Program involves a federal guarantee on local debt allowed under Section 108 of the Housing and Community Development Act of 1974, as amended. This section of the Act allows public entities, such as the Clackamas County, to issue promissory notes through HUD to raise money for eligible large-scale community and economic development activities. HUD guarantees these notes, which are sold on the private market in return for a grantee's pledge of its future CDBG funds and other security for the purpose of debt repayment. Section 108 activities must satisfy CDBG eligibility and national objective criteria as well as Section 108 regulations and guidelines.

Senior A person who is at least 55 years of age. For senior housing activities, a senior is a person who is at least 62 years of age. (Seniors and "elderly" are terms that are often interchangeable.)

Shelter Plus Care A federally funded McKinney Act Program designed to provide affordable housing opportunities to individuals with mental and/or physical disabilities.

SRO (Single Room Occupancy) A unit for occupancy by one person, which need not but may contain food preparation or sanitary facilities, or both.

State Any State of the United States and the Commonwealth of Puerto Rico.

Subsidy Generally, a payment or benefit made where the benefit exceeds the cost to the beneficiary.

Substantial Rehabilitation Rehabilitation of residential property at an average cost for the project in excess of \$25,000 per dwelling unit.

Supportive Housing Services provided to residents of supportive housing for the purpose of facilitating the independence of residents. Some examples are case management, medical or psychological counseling and supervision, childcare, transportation, and job training.

Supportive Housing Program (SHP) The Supportive Housing Program promotes the development of supportive housing and supportive services, including innovative approaches that assist homeless persons in the transition from homelessness and enable them to live as independently as possible. SHP funds may be used to provide transitional housing, permanent housing for persons with disabilities, innovative supportive housing, supportive services, or safe havens for the homeless.

Transitional Housing Is designed to provide housing and appropriate supportive services to persons, including (but not limited to) deinstitutionalized individuals with disabilities, homeless individuals with disabilities, and homeless families with children. Also, it is housing with a purpose of facilitating the movement of individuals and families to independent living within a time period that is set by the County or project owner before occupancy.

APPENDIX F: PUBLIC INPUT

The following section represents meeting minutes from the three Consolidated Plan public hearings that were held April 1 and 2, 2009 in Rockford. The purpose of the public hearings was to offer the community the opportunity to provide feedback on the findings of the Consolidated Plan. The presentation is available at the Rockford Community Development Department.

CONSOLIDATED PLAN PUBLIC HEARING 1

**City of Rockford
Community Development Department**

PUBLIC HEARING CONCERNING

2010 – 2014 Five Year Consolidated Plan and Analysis of Impediments

**Wednesday, April 1, 2009 – 3:00 PM
Goodwill Abilities Center
1907 Kishwaukee St**

MINUTES

Rob Gaudin, a consultant with Western Economic Services LLC, was present to explain the following power-point presentation:

Slide 1 – Rockford’s Community Development Department

Mr. Gaudin welcomed everyone to the public input meeting regarding the 2010-2014 Consolidated Plan and Analysis of Impediments. He explained that this presentation is a review of the preliminary findings.

Slide 2 – Why do a Consolidated Plan?

A Five-Year Consolidated Plan is a requirement for receiving HOME, CDBG and ESG funding. He also explained that recipients must certify that they are affirmatively furthering fair housing. In order to do this they must conduct an analysis of impediments, take actions and maintain records.

Slide 3 – Purposes and Objectives of Plan

The purposes are to identify housing and community development needs, priorities and strategies and indicate how funds will be allocated. The objectives are to provide decent housing, a suitable living environment and expand economic opportunities.

Slide 4 – Purpose of Today’s Meeting

The purpose of this meeting is to present the preliminary results of analysis of expressed needs and the preliminary results of the analysis of impediments to fair housing.

Slide 5 – Purpose of Today’s Meeting

Another purpose of this meeting is to get input from the community regarding the housing and community development needs and what should be done about them. Input is also requested regarding opinions and experiences with the fair housing situation and fair housing choice in Rockford.

Slide 6 – City of Rockford

The City of Rockford has been divided into three areas. They began titled Police Command Zones but are now referred to as Districts. This presentation will be comparing the data between the three districts.

Slide 7 – First: A Situation Review

The presentation will cover demographic trends, economic influences, housing market direction and the findings of the 2008 Housing and Community Development Survey.

Slide 8 - Rockford Demographics – Population in the City has been increasing since 2000

- 1/3 of growth over the last 7 years occurred between 2006 and 2007
- Overall city is 73% white, 17% black and 10% Hispanic and other
- Distribution: District 3 – 86% white
 - District 1 – 35% black
 - District 2 – 13.6% Hispanic

Slide 9 – Rockford Demographics – 2000 Population Composition

Slide 10 – Rockford Demographics – Percent African American by Census Block Group

Slide 11 - Rockford Demographics – Percent Hispanic by Census Block Group

Slide 12 – Rockford Demographics – Percent of Population with Disability by Census Block Group

HUD considers it disproportionate distribution when the percentage in a single area is more than 10 percentage points higher than the overall city percentage for a particular group. Any census tract that has higher than 27% blacks or 20% Hispanic is considered disproportionate. District 1 has a high number of census tracts that have a disproportionate number of black and Hispanic with several tracts in the 68% - 81% range. District 2 has a smaller pocket of disproportionate tracts.

Slide 13 – Rockford Demographics – 2000 Population Age Composition

There is also a significant difference in the population distribution by age group. District 3 has 52% of the population that are 65 and older. District 1 has 40% of the population that is under 20.

Slide 14 – Winnebago Economics – Full and Part-Time Employment

Economic data from the Bureau of Economic Analysis – IRS data, counts jobs so if you have two jobs you are counted twice. There was a steady growth of jobs until 2000 when it dropped. It began increasing again around 2003 but did not recover completely to the 2000 level.

Slide 15 – Winnebago Economics – Labor Force and Employment

Slide 16 – Winnebago Economics – Unemployment Rate

Labor force data from the Bureau of Labor Statistics counts the number of people available to work compared to the number of people that are employed. In 2008 the labor force remained fairly steady but the number of people employed dropped dramatically which is reflected by the spike in the unemployment rate to 12% at the end of 2008 compared to the national rate of 7.2%.

Slide 17 – Winnebago Economics – Real Average Earnings Per Job

Real Average Earnings Per Job – data from the Bureau of Economic Analysis. Winnebago County was above the national average until the mid 1980's. Beginning in 2002 the national average continued to rise while the county average began declining. This average will continue to fall unless the new jobs in the area are at least \$40,000 jobs. The national average is close to \$50,000.

Slide 18 – Rockford Economics – Households by Income

The distribution of income per household shows that 32% of the households in the city have incomes less than \$25,000. This is from older data, the 2000 census. The census data shows the 1999 Median HH Income at \$37,667 and the estimated 2007 Median HH Income from the American Community Survey is \$37,455.

Slide 19 – Rockford Economics – Percent of Population in Poverty by Census Block Group

The percentage of population in poverty is also disproportionately located primarily in District 1 with a large number of census tracts between 24% and 54% and one tract above 54%. The overall city average is 14%.

Slide 20 – Rockford Housing – Dwelling Types in the City of Rockford

According to the 2000 census, District 3 has 41% of the housing stock. It has the largest share of single family units and apartments and the lowest share of duplex, tri- or four-plex units.

Slide 21 – Rockford Housing – Occupied Housing by Tenure

Home ownership rates vary significantly between districts also. Districts 1 and 2 are at 56.1% and 50.9% which is below the national average of 69%. District 3 is at 71.5% which is just slightly above the national average. This is also from the 2000 Census.

Slide 22 – Rockford Housing – Occupied and Vacant Housing

There are 4400 vacant units in Rockford. The rental vacancy rate in District 2 is 10.7% which is high. Approximately 3000 units are available for sale or rent leaving 1400 units as vacant "other." They are not available which is a concern because it could represent abandoned property or property where there is a question regarding ownership. These tend to be properties that are not taken care of.

Slide 23 – Rockford Housing – Cost Burdens

The Cost Burdens in Rockford are favorable. A cost burden is defined as 30% - 50% of income being spent on housing. A severe cost burden is when more than 50% of income is spent on housing. The overall cost burdens in Rockford are lower than the national average.

Slide 24 – Rockford Housing – Residential Building Permits

Even though there is a high vacancy rate, residential building permits show steady new construction of 300 – 500 units each year. This tends to make some of the available housing undesirable.

Slide 24 – Rockford Housing – Residential Sales Prices from Assessor

Slide 25 – Rockford Housing – Distribution of Housing by Vintage

Slide 26 – Rockford Housing – Distribution of Housing by Condition

Slide 27 – Rockford Housing – Location of RHA and WCHA Housing

The Rockford Township Assessor's office provided data regarding residential sales prices from 1985 – 2007. It shows that there is a significant difference in prices between Districts 1 and 2 compared to District 3. One main reason for this is the age of the properties. The oldest properties are in District 1 and 2. The newest properties are in District 3. The information also shows that the housing in the worst condition is located in Districts 1 and 2. The location of the majority of public housing is also in these districts

Slides 29 – 38 – 2008 Housing and Community Development Survey

The 2008 Housing and Community Development Survey was done in the fall with 289 total completed. The results from the questions showing the highest sentiment are as follows:

- Areas of Primary Interest – Economic Development (90), Housing (77)
- Local Business Support – High need (163)
- Work Force Training – High need (143)
- Residential Rehabilitation – High need (127)
- Affordable For-Sale Housing – High need (80), Medium need (74), Low need (60)
- Senior Housing – Medium need (101)
- Youth Centers – High need (120)
- Crime Awareness – High need (139)
- Street/Alley Improvement – High need (151)
- Sidewalk Improvements – High need (124)

Slide 39 – Rockford Cons Plan Summary

In summary, Mr. Gaudin explained that Rockford has continuing population growth, persisting economic difficulties and growth problems, increased housing challenges and rising community development needs.

Slide 40 – Definition of Impediments to Fair Housing Choice

Impediments to fair housing choice are actions, omissions, or decisions which restrict housing choice because of protected class status. They may be overt or have the effect of limiting choice and may be intentional or accidental.

Slide 41 – Who is Protected?

There are 13 protected classes under state and federal law. They include race, color, religion, sex, national origin, ancestry, age (40 or over), marital status, disability, military status, familial status, sexual orientation or unfavorable military discharge.

Slide 42 – 2008 Fair Housing Survey – Rockford Findings

Mr. Gaudin explained that these questions were at the end of the 2008 Housing and Community Development Survey conducted in the fall. Not as many people answered these questions. He noted that while a large number of people said they are aware of a fair housing ordinance and believe it serves a useful purpose, he is concerned with the number of people who answered “Don’t Know.”

Slide 43 – 2008 Fair Housing Survey – Rockford Findings

When asked what groups are protected there was not a large number of people that responded with correct answers. There were 20 people who listed “low-income” which is not a protected class. He noted that “tenants” was listed but also isn’t a protected class.

Slide 44 – 2008 Fair Housing Survey – Rockford Findings

When asked about barriers to fair housing, a large number of people answered “yes” that they believe there are barriers to improving fair housing and that specific areas of the city have a problem. When asked if they think City policies, codes or regulations are adverse to fair housing, quite a few people answered “no.” Once again, there was a large number of “Don’t Know.”

Slide 45 – 2008 Fair Housing Survey – Rockford Findings

Mr. Gaudin explained that the list of Selected Fair Housing Concerns that were received contain many concerns that are not actually fair housing. They include landlord/tenant issues and housing /planning issues.

Slide 46 – 2008 Fair Housing Survey – Rockford Findings

It is clear that the City of Rockford does not have a good Fair Housing Complaint Referral System. Only a small number of people knew who to refer a complaint to.

Slide 47 – 2008 Fair Housing Survey – Rockford Findings

The survey showed that 142 people were not aware of any fair housing testing. It was noted during discussion that this question could have been misunderstood. Some people took it as “Do you know of any fair housing testing occurring right now?” and Mr. Gaudin explained that the intent was to determine if people were aware that fair housing testing exists and is done in Rockford.

Slide 48 – 2008 Fair Housing Survey – Rockford Findings

When asked if the fair housing ordinance should be strengthened, 52 said “yes”, 46 said “no” but 112 answered “Don’t Know.”

Slide 49 - – 2008 Fair Housing Survey – Rockford Findings

This slide showed that most of the residents are not aware of any fair housing planning by the city of Rockford.

Slide 50 – 2008 Fair Housing Survey – Rockford Findings

The current level of fair housing outreach and education is too little according to 96 residents. There were 70 residents that said there’s the right amount and 21 believe there’s too much.

Slide 51 – Rockford Housing Complaints – Fair Housing Complaints

The number of complaints submitted to the Illinois Department of Human Rights (IDHR) and/or U.S. Housing and Urban Development (HUD) has been extremely low since 2001. Mr. Gaudin explained that IDHR is a substantially equivalent agency which means that they have the authority to handle both the federal and state law violations. He also explained that communities of our size normally have around 600 complaints. He believes that our numbers are so low because we lack the necessary referral system or agency to handle complaints.

A meeting participant commented that she believes Rockford lacks a piece of social service infrastructure that is very significant. This is an information and referral agency that takes calls and has a database of human services. She noted that other states have a “211” system for this but Illinois does not, even though it has been worked on since 2000.

Slide 52 – Rockford Fair Housing – Mortgage Denial Rates

This chart only includes mortgages that the bank actually denied or approved and does not include any that did not close for another reason such as the applicant changed his mind or the application was incomplete.

Slide 53 – Rockford Fair Housing – Mortgage Denial Rates

Slide 54 – Rockford Fair Housing – Minority Mortgage Denial Rates

These charts show that most of the mortgage denials occurred in District 1 with a smaller number occurring in District 2.

Slide 55 – Rockford Fair Housing – Percent High-Interest Loans

HMDA data began including interest rate information in 2004. This chart shows that most of the high interest loans (predatory loans) occurred in Districts 1 and 2. There also were a few census tracts in District 3 with a large number of these loans. It was determined during discussion that this was one particular new sub-division on the southeast side. Mr. Gaudin explained that these loans increase the foreclosure risk in these areas. He noted that most of these loans occurred in 2006. They dropped off in 2007 and are mostly gone now. The problem will go away except for the people that already have these loans may be in trouble and at risk for foreclosure. He noted that this study only covered new mortgages and did not include any refinances or home equity loans.

Slide 56 and 57 – 2009 Analysis of Impediments

Mr. Gaudin summarized that the City of Rockford's prospective impediments are:

- Insufficient fair housing system capacity
- Lack of effective referral system
- Lack of understanding of fair housing
- Distribution of sales is a concern
- Potential history of red lining or blockbusting
- Subprime and predatory loan targeting is evident

During discussion, Mr. Gaudin explained that the HMDA data on the predatory loans includes the loan amount, the household income, and if it is a first or second mortgage. It does not indicate if they are first time homebuyers. He noted that the data is available now to provide a list of lenders and how many sub-prime loans they have done. He noted that educating the public about credit is the most important thing that can be done to prevent this.

Slide 58 – Consolidated Plan and AI – Your Input is Needed

Mr. Gaudin explained that any questions or comments are welcome and after the meeting can be directed to himself, Dwayne Collins or Vicki Manson.

Question (citizen) – How could developers utilize this information as far as identifying areas that are run down and deciding to come to an area that other developers may be afraid to come to?

Answer (Mr. Gaudin) – The geographic charts will be included in the document and can be compared to the market areas. It also provides some sales data from the Assessor's office.

Question (citizen) – With the results of this survey, did you have something in mind as to what to do with the results of the survey? Is it meant to educate the government? It was obvious that there are certain inequities and vast gaps.

Answer – (Mr. Gaudin) All of the data will be in the Consolidated Plan. It presents the needs of the community. The needs are then prioritized and the city of Rockford can use

the data to make decisions as to what projects can be funded with the limited amount of resources we receive.

Question (citizen) – In response to an article in the *Rockford Register Star* regarding TIF districts, I’m wondering if they creating incentives in areas that may not be in need of development? Are we furthering the gap by driving the development to these areas?

Answer (staff) – We can’t legally create a TIF district that does not meet the requirements. Another thing to keep in mind is that there are different types of TIF districts, commercial and residential.

Comment (citizen) – There are things we can do that are legal but are not smart. The TIF could be legal but not in the best interest of the community at large.

Comment (citizen) – The TIF in the Hope VI area seemed to be beneficial but there is a new TIF being proposed near Haight Village and that area is steadily growing and is not blighted so it doesn’t seem that it falls into the definition of where a TIF should be. I’m concerned about how much city planning is driving the market.

Comment (citizen) – There is a TIF on East State street that is commercial and a possible TIF for a new college, how does that benefit the west side?

Comment (citizen) – You have to remember that the west side starts at Mulford and is divided by the river. You have to look at the whole picture and how it will benefit the entire area. TIFs are done where there is a tax base to support them and unfortunately on the west side the opportunities aren’t there because they don’t have the needed tax base or the potential for a substantial increase in tax revenue.

Comment (citizen) – I’m concerned with the new TIF that runs along Madison street to Whitman and comes down and takes in the Rockford Housing Authority.

Comment (citizen) – They changed the zoning for that area a few years ago to commercial and there’s definitely a plan for the area.

Comment (citizen) – If the TIF’s are meant to attract developers to specific areas that are not areas of need you are telling them not to go into the areas of need.

Answer (Mr. Gaudin) – There are a lot of TIFs that are in areas of need also.

Answer (staff) – You also have to remember that a TIF is just another tool being used and is often used when there is knowledge of a project that will begin development and hopefully facilitate further development in the area. Garrison school is an example of this.

Answer (staff) – There are properties in and surrounding Haight Village that do need to be redeveloped. The surrounding area is preventing the property values in Haight Village from increasing. One developer purchased multiple properties surrounding Jane Addams and will assist the city with the plan to redevelop them for market and not as section 108 rentals. The TIF just provides incentive for this and is not a guarantee.

Question (citizen) – How much pressure does HUD put on the community to fix the inequities demonstrated in the surveys?

Answer (staff) – They review our Consolidated Plan and yearly Action Plans to determine if we are doing what we said we would do. We also have to submit an annual report on what was done. It is up to each community to do what they can with the limited resources available.

Question (citizen) – Were the inequities worse 15 years ago?

Answer (staff & citizen) – It is believed that it is about the same. A Consolidated Plan was not required then so the data is not available for comparison.

Question (citizen) – Do you think there have been improvements in the last 10 years?

Answer (staff) – We are growing poorer by the decade due to the declining economy and the loss of manufacturing.

Answer (Mr. Gaudin) – When you talk about growth and the composition of the population changing, you have new residents moving in that aren't finding the good manufacturing jobs any longer and they may not know English as well so the nature of new residents is different than it was 25 years ago.

Comment (citizen) – That's true to a degree but a lot of our new businesses now are started by people of different ethnic backgrounds.

Comment (citizen) - This presentation is disappointing because it just tells a story but doesn't tell how much we want to use for specific line items. It doesn't show what we are asking for.

Answer (staff) – That will come later when we do the Action Plan, using the data that is being gathered now. It will specify what we plan to do to meet the needs as outlined.

Comment (citizen) - There is a lack of information referrals in the community. We clearly have significant challenges. We used to have CONTACT, a referral agency that had a crisis line, a database of 1500 services, published a directory of services and had information available on-line. This agency is gone and leaves a piece of infrastructure that is significantly missing. United Way launched the 211 initiative nationally but nothing was done in Illinois regarding this. We do not have a current accounting of these services so we are in the unfortunate position of not having the data available even if the 211 system could be made available. I would strongly urge that we determine what entity should do this and fund it and make sure we keep it funded.

Answer (staff) - The funding is the difficult part and what Contact struggled with.

Comment (citizen) - Just as we have with 911, something could be done with the county and city regarding this. Some of the information is available through WinCart. Another issue is that each non-profit needs specific direction so there is not duplication of services.

Comment (citizen) – Isn't Rockstat supposed to address this?

Answer (staff) - No, Rockstat itself does not address this but when we visited Baltimore had a 211 system included with their Citystat program that worked well. However, it also had a large staff associated with it.

Comment (citizen) – Bloomington has a program that is staffed by 150 volunteers. You have to have the necessary IT to support a system. If you have this you can track how many calls are referred to each agency and track what the actual needs are. Pooling resources and avoiding duplication such as several non-profits publishing a directory with the same information in them would help with funding. It is a matter of efficiency and having the political wheel in place to get all the separate agencies cooperating.

Comment (staff) – The City is working on a 311 call center to help centralize the intake procedures for all departments. This will help improve efficiency and referrals.

Question (citizen) – Where do utilities come into the cost burdens?

Answer (Mr. Gaudin) – For rentals it includes energy utilities. For homeowners it includes energy utilities plus water, sewer and refuse collection.

Question (citizen) – Is insurance included?

Answer (Mr. Gaudin) – For homeowners it includes the mortgage, taxes, insurance and utilities.

With no further questions or comments, Mr. Gaudin thanked everyone and the meeting ended.

CONSOLIDATED PLAN PUBLIC HEARING 2

City of Rockford
Community Development Department

PUBLIC HEARING CONCERNING

2010 – 2014 Five Year Consolidated Plan and Analysis of Impediments

Wednesday, April 1, 2009 – 6:00 PM
Rockford Housing Authority
223 S. Winnebago Street

MINUTES

Rob Gaudin, a consultant with Western Economic Services LLC, was present to explain the following power-point presentation:

Slide 1 – Rockford’s Community Development Department

Mr. Gaudin welcomed everyone to the public input meeting regarding the 2010-2014 Consolidated Plan and Analysis of Impediments. He explained that this presentation is a review of the preliminary findings.

Slide 2 – Why do a Consolidated Plan?

A Five Year Consolidated Plan is a requirement for receiving HOME, CDBG and ESG funding. He also explained that recipients must certify that they are affirmatively furthering fair housing. In order to do this they must conduct an analysis of impediments, take actions, and maintain records.

Slide 3 – Purposes and Objectives of Plan

The purposes are to identify housing and community development needs, priorities, and strategies and indicate how funds will be allocated. The objectives are to provide decent housing, a suitable living environment, and expand economic opportunities.

Slide 4 – Purpose of Today’s Meeting

The purpose of this meeting is to present the preliminary results of analysis of expressed needs and the preliminary results of the analysis of impediments to fair housing.

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Another purpose of this meeting is to get input from the community regarding the housing and community development needs and what should be done about them. Input is also requested regarding opinions and experiences with the fair housing situation and fair housing choice in Rockford.

Slide 6 – City of Rockford

The City of Rockford has been divided into three areas. They began titled Police Command Zones but are now referred to as Districts. This presentation will be comparing the data between the three districts.

Slide 7 – First: A Situation Review

The presentation will cover demographic trends, economic influences, housing market direction and the findings of the 2008 Housing and Community Development Survey.

Slide 8 - Rockford Demographics – Population in the city has been increasing since 2000

- 1/3 of growth over the last 7 years occurred between 2006 and 2007
- Overall city is 73% white, 17% black and 10% Hispanic and other
- Distribution: District 3 – 86% white
 - District 1 – 35% black
 - District 2 – 13.6% Hispanic

Slide 9 – Rockford Demographics – 2000 Population Composition

Slide 10 – Rockford Demographics – Percent African American by Census Block Group

Slide 11 - Rockford Demographics – Percent Hispanic by Census Block Group

Slide 12 – Rockford Demographics – Percent of Population with Disability by Census Block Group

HUD considers it disproportionate distribution when the percentage in a single area is more than 10 percentage points higher than the overall city percentage for a particular group. Any census tract that has higher than 27% blacks or 20% Hispanic is considered disproportionate. District 1 has a high number of census tracts that have a disproportionate number of black and Hispanic with several tracts in the 68% - 81% range. District 2 has a smaller pocket of disproportionate tracts.

Slide 13 – Rockford Demographics – 2000 Population Age Composition

There is also a significant difference in the population distribution by age group. District 3 has 52% of the population that are 65 and older. District 1 has 40% of the population that is under 20.

Slide 14 – Winnebago Economics – Full and Part-Time Employment

Economic data from the Bureau of Economic Analysis – IRS data, counts jobs so if you have two jobs you are counted twice. There was a steady growth of jobs until 2000 when it dropped. It began increasing again around 2003 but did not recover completely to the 2000 level.

Slide 15 – Winnebago Economics – Labor Force and Employment

Slide 16 – Winnebago Economics – Unemployment Rate

Labor force data from the Bureau of Labor Statistics counts the number of people available to work compared to the number of people that are employed. In 2008 the labor force remained fairly steady but the number of people employed dropped dramatically which is reflected by the spike in the unemployment rate to 12% at the end of 2008 compared to the national rate of 7.2%.

Slide 17 – Winnebago Economics – Real Average Earnings Per Job

Real Average Earnings Per Job – data from the Bureau of Economic Analysis. Winnebago County was above the national average until the mid 1980's. Beginning in 2002 the national average continued to rise while the county average began declining. This average will continue to fall unless the new jobs in the area are at least \$40,000 jobs. The national average is close to \$50,000.

Slide 18 – Rockford Economics – Households by Income

The distribution of income per household shows that 32% of the households in the city have incomes less than \$25,000. This is from older data, the 2000 census. The census data shows the 1999 Median HH Income at \$37,667 and the estimated 2007 Median HH Income from the American Community Survey is \$37,455.

Slide 19 – Rockford Economics – Percent of Population in Poverty by Census Block Group

The percentage of population in poverty is also disproportionately located primarily in District 1 with a large number of census tracts between 24% and 54% and one tract above 54%. The overall city average is 14%.

Slide 20 – Rockford Housing – Dwelling Types in the City of Rockford

According to the 2000 census, District 3 has 41% of the housing stock. It has the largest share of single family units and apartments and the lowest share of duplex, tri- or four-plex units.

Slide 21 – Rockford Housing – Occupied Housing by Tenure

Home ownership rates vary significantly between districts also. Districts 1 and 2 are at 56.1% and 50.9% which is below the national average of 69%. District 3 is at 71.5% which is just slightly above the national average. This is also from the 2000 census.

Slide 22 – Rockford Housing – Occupied and Vacant Housing

There are 4400 vacant units in Rockford. The rental vacancy rate in District 2 is 10.7% which is high. Approximately 3000 units are available for sale or rent leaving 1400 units as vacant “other.” They are not available which is a concern because it could represent abandoned property or property where there is a question regarding ownership. These tend to be properties that are not taken care of.

Slide 23 – Rockford Housing – Cost Burdens

The Cost Burdens in Rockford are favorable. A cost burden is defined as 30% - 50% of income being spent on housing. A severe cost burden is when more than 50% of income is spent on housing. The overall cost burdens in Rockford are lower than the national average.

Slide 24 – Rockford Housing – Residential Building Permits

Even though there is a high vacancy rate, residential building permits show steady new construction of 300 – 500 units each year. This tends to make some of the available housing undesirable.

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Slide 27 – Rockford Housing – Location of RHA and WCHA Housing

The Rockford Township Assessor’s office provided data regarding residential sales prices from 1985 – 2007. It shows that there is a significant difference in prices between Districts 1 and 2 compared to District 3. One main reason for this is the age of the properties. The oldest properties are in District 1 and 2. The newest properties are in District 3. The information also shows that the housing in the worst condition is located in Districts 1 and 2. The location of the majority of public housing is also in these districts

Slides 29 – 38 – 2008 Housing and Community Development Survey

The 2008 Housing and Community Development Survey was done in the fall with 289 total completed. The results from the questions showing the highest sentiment are as follows:

- Areas of Primary Interest – Economic Development (90), Housing (77)
- Local Business Support – High need (163)
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Slide 39 – Rockford Cons Plan Summary

In summary, Mr. Gaudin explained that Rockford has continuing population growth, persisting economic difficulties and growth problems, increased housing challenges and rising community development needs.

Slide 40 – Definition of Impediments to Fair Housing Choice

Impediments to fair housing choice are actions, omissions or decisions which restrict housing choice because of protected class status. They may be overt or have the effect of limiting choice and may be intentional or accidental.

Slide 41 – Who is Protected?

There are 13 protected classes under state and federal law. They include race, color, religion, sex, national origin, ancestry, age (40 or over), marital status, disability, military status, familial status, sexual orientation or unfavorable military discharge.

Slide 42 – 2008 Fair Housing Survey – Rockford Findings

Mr. Gaudin explained that these questions were at the end of the 2008 Housing and Community Development Survey conducted in the fall. Not as many people answered these questions. He noted that while a large number of people said they are aware of a fair housing ordinance and believe it serves a useful purpose, he is concerned with the number of people who answered “Don’t Know.”

Slide 43 – 2008 Fair Housing Survey – Rockford Findings

When asked what groups are protected there was not a large number of people that responded with correct answers. There were 20 people who listed “low-income” which is not a protected class. He noted that “tenants” was listed but also isn’t a protected class.

Slide 44 – 2008 Fair Housing Survey – Rockford Findings

When asked about barriers to fair housing, a large number of people answered “yes” that they believe there are barriers to improving fair housing and that specific areas of the city have a problem. When asked if they think City policies, codes or regulations are adverse to fair housing, quite a few people answered “no.” Once again, there was a large number of “Don’t Know.”

Slide 45 – 2008 Fair Housing Survey – Rockford Findings

Mr. Gaudin explained that the list of Selected Fair Housing Concerns that were received contain many concerns that are not actually fair housing. They include landlord/tenant issues and housing /planning issues.

Slide 46 – 2008 Fair Housing Survey – Rockford Findings

It is clear that the city of Rockford does not have a good Fair Housing Complaint Referral System. Only a small number of people knew who to refer a complaint to.

Slide 47 – 2008 Fair Housing Survey – Rockford Findings

The survey showed that 142 people were not aware of any fair housing testing. Mr. Gaudin explained that the intent was to determine if people were aware that fair housing testing exists and is done in Rockford.

Slide 48 – 2008 Fair Housing Survey – Rockford Findings

When asked if the fair housing ordinance should be strengthened, 52 said “yes,” 46 said “no” but 112 answered “Don’t Know.”

Slide 49 - – 2008 Fair Housing Survey – Rockford Findings

This slide showed that most of the residents are not aware of any fair housing planning by the city of Rockford.

Slide 50 – 2008 Fair Housing Survey – Rockford Findings

The current level of fair housing outreach and education is too little according to 96 residents. There were 70 residents that said there’s the right amount and 21 believe there’s too much.

Slide 51 – Rockford Housing Complaints – Fair Housing Complaints

The number of complaints submitted to the Illinois Department of Human Rights (IDHR) and/or U.S. Housing and Urban Development (HUD) has been extremely low since 2001. Mr. Gaudin explained that IDHR is a substantially equivalent agency which means that they have the authority to handle both the federal and state law violations. He also explained that communities of our size normally have around 600 complaints. He believes that our numbers are so low because we lack the necessary referral system or agency to handle complaints.

Slide 52 – Rockford Fair Housing – Mortgage Denial Rates

This chart only includes mortgages that the bank actually denied or approved and does not include any that did not close for another reason such as the applicant changed his mind or the application was incomplete.

Slide 53 – Rockford Fair Housing – Mortgage Denial Rates

Slide 54 – Rockford Fair Housing – Minority Mortgage Denial Rates

These charts show that most of the mortgage denials occurred in District 1 with a smaller number occurring in District 2.

Slide 55 – Rockford Fair Housing – Percent High-Interest Loans

HMDA data began including interest rate information in 2004. This chart shows that most of the high interest loans (predatory loans) occurred in Districts 1 and 2. There also were a few census tracts in District 3 with a large number of these loans. Mr. Gaudin explained that these loans increase the foreclosure risk in these areas. He noted that most of these loans occurred in 2006. They dropped off in 2007 and are mostly gone now. The problem will go away except for the people that already have these loans may be in trouble and at risk for foreclosure. He noted that this study only covered new mortgages and did not include any refinances or home equity loans.

Slide 56 and 57 – 2009 Analysis of Impediments

Mr. Gaudin summarized that the city of Rockford's prospective impediments are:

- Insufficient fair housing system capacity
- Lack of effective referral system
- Lack of understanding of fair housing
- Distribution of sales is a concern
- Potential history of red lining or blockbusting
- Subprime and predatory loan targeting is evident

Slide 58 – Consolidated Plan and AI – Your Input is Needed

Mr. Gaudin explained that any questions or comments are welcome and after the meeting can be directed to himself, Dwayne Collins or Vicki Manson.

Comment (citizen) – The standard road blocks people run into when trying to purchase a home are a problem such as having to have stellar credit. There should be more help available.

Comment (citizen) – A life-long resident who has experience doing home visits for a social service agency feels that the poverty pockets and disproportionate distribution in the city is a result of the last 30-40 years of red-lining and racism. She noted that there are so many people on the east side of the river that are terrified to cross the river that it creates a huge obstacle for housing and community development. She stated that it is necessary to engage the people on the east side to get involved with the whole community. She suggested that realtors could be a starting point for this by not telling clients that they “don’t want to live there (on the west side).”

Comment (citizen) – The Community Development Department has a lot of information available but she believes we have a community that does not want to be educated. They do not want to know what is going on and have a “it’s not our problem” attitude. They may be willing to make a small contribution but they really don’t want to get involved.

Comment (citizen) - There’s not enough attention being given to the west side. There are some improvements but not enough attention is given for and to the west side.

Question (citizen) - Do you see the same “west side epidemic” when you do the studies for other cities?

Answer (Mr. Gaudin) – We all share some of the problems although the scale may be different.

Comment (citizen) – All of the concentrations of poverty, predatory lending, etc. are in Districts 1 and 2. That is also where all of the public housing developments are. Tearing down the Jane Addams development is a good beginning to making improvements in the area but most of the families went into section 108 housing on the west side and there are still other developments such as Concord Commons and Fairgrounds. The nicest section 108 housing is still on the east side and not on the west side. She suggested tearing all of the developments down and putting the money into section 108 housing so that someone other than the government and citizens are taking care of the properties.

Comment (Mr. Gaudin) – He verified that, from comments made earlier, the belief is that the fair housing ordinance should be strengthened to include that you cannot direct people like they are now. He also confirmed that people believe redevelopment is the way to go.

Comment (citizen) – Tearing down some of the old houses and getting developers to build new homes there would help.

Comment (citizen) – Several examples were given of realtors that have told people that they don’t want to live on the west side. It was noted that even though there is education available, and sometimes mandatory, you can’t make someone be fair if it’s not in their heart. How can you make them get it in their heart so they want to practice fairness?

Question (Mr. Gaudin) – Are there instances here where real estate agents team up with unscrupulous brokers to get deals through for people that should be buying homes?

Answer (citizen) – Yes, we have had that. There are agents and loan officers actually serving prison time because of this. Much of the unfairness is coming from the redlining, the financial institutions, and the realtors who just don’t have it in their hearts to be fair.

Question (citizen) - Have you seen any evidence in cities where you might be able to attract investment by having a better product such as using renewable energy features, building homes beyond code and making them very energy efficient? It seems like we have corridor projects going on that present a perfect opportunity for doing this.

Answer (Mr. Gaudin) – Rehabbing a home for energy efficiency is more costly because it involves rehabbing it for other things also. The extra cost is covered by the energy efficiency. There is federal money, stimulus money, available for this type of project.

Comment (citizen) – It seems that most of the single family housing development in this area is of sub-standard quality even for the higher priced homes (several citizens agreed with this). He noted that the older homes were built much better and built to last longer. Even though you have to put money in it you have a better value than in a new house that is not built well and will need major repairs in a few years. The public needs to be educated about what is actually a good value. The key to change is attracting the younger generation because the older people are set in their ways and you probably won’t change their attitudes.

Comment (citizen) – The Rockford Homebuilders Association put out a challenge a few years ago to see who could build the cheapest house. There are incentives available through tax credits now for builders and architects to build a better product.

Question (Vicki Manson) – How can you build a better product and sell it for what it costs to build, which can be very expensive, when the market values are so low? She asked to see plans for an affordable “green” house.

Answer (citizen) – There are things that can be done to make them more affordable to build. You don’t have to use the best products but even mid-line “green” products are better than standard housing. You can start building incrementally better products. By doing this you raise the value in the marketplace.

Comment (citizen) – There have been examples of positive affordable housing built in Rockford such as in the West Side Alive and Youthbuild programs. They were built with good quality materials and energy efficient appliances.

Comment (Mr Gaudin) – In response to several comments made about the demolition of very deteriorated properties, he concluded that a good way to improve the housing stock is to eliminate the worst end.

Comment (citizen) – It was suggested that maybe the City could take a chance and build an energy efficient home and issue a challenge of some kind to builders and architects to build a truly cost efficient, energy efficient home, affordably. He noted that they can’t just focus on solar and wind technology, the E’s in “green” stand for Energy Efficiency. He believes opportunities are being missed by not pursuing this idea.

Comment (citizen) – It seems like the City allows a certain amount of money for demolition each year. Could landlords and citizens put pressure on the City to demolish more homes?

Answer (Vicki Manson) - Vicki explained that there is a cap on the amount of CDBG funds that can be spent on demolitions. She explained that property is chosen for demolition based on complaints from citizens, the police department and from city staff evaluating vacant properties. She also explained the demolition property.

Question (citizen) – Why can’t the City make the property owners pay for the demolitions?

Answer (Vicki Manson) – We do try but often all we can do is to put a lien on the property. We do everything that we can do legally.

Comment (citizen) – It seems that there should be some way to make the property owners be responsible for the property like being able to take other property that they own or something. Right now there are really no consequences for someone that just “walks away” from the property.

Comment (citizen) – If a group of citizens feel a house should be demolished and they present that to the city it would be possible to get it demolished. When this is done, it leaves a lot that is going to need special attention such as making sure the lawn is mowed.

Comment (citizen) – Something needs to be done regarding landlords that continually rent to problem tenants such as drug dealers.

Comment (citizen) – It was suggested that the large churches on the east side could start promoting the west side more positively and begin to engage their parishoners. This could be a beginning to changing the attitudes toward the west side.

Comment (citizen) – Several comments were made regarding making landlords more responsible for their properties. It was noted that we have prosecuted several landlords.

Question (citizen) – Is the mechanism for prosecuting landlords complaint driven?

Answer (Vicki Manson) – It can be from citizen complaints or referrals from other areas such as the police department.

Question (Andrea Hinrichs) – Are other cities able to resolve some of these issues because they have Home Rule?

Answer (Vicki Manson, Dwayne Collins) – That is part of the problem, we are limited to what we can do. With Home Rule we would have more power to govern the landlords before the properties get so bad.

Comment (citizen) - Katy Langenfeld introduced herself as a Community Outreach Coordinator for Representative Chuck Jefferson. She told everyone that she is attending events in Rockford to see how he may be able to help the community at the state level. One issue that has come up is the difference between West State Street and East State Street. He is currently working on a statewide capital construction bill that would allocate money to fix the road and sidewalk on West State Street. She noted that if anyone has other issues they should contact her.

Comment (citizen) – Another main problem is that Rockford does not have a highway system. Most cities this size have some kind of a freeway system. It takes a long time to get from one side of town to the other. It is not easy to get around in Rockford. The tollway should not have been allowed to go so far out on the east side.

Comment (citizen) - Some of the traffic issues are being addressed as part of the corridor projects that are in process like the Kishwaukee project.

Mr. Gaudin thanked everyone for their attendance and participation. He noted that if anyone thinks of something else they can contact him, Vicki Manson or Dwayne Collins.

With no further questions or comments, the meeting ended.

CONSOLIDATED PLAN PUBLIC HEARING 3

City of Rockford
Community Development Department

PUBLIC HEARING CONCERNING

2010 – 2014 Five Year Consolidated Plan and Analysis of Impediments

Thursday, April 2, 2009 – 9:00 AM
Anderson Gardens
318 Springcreek Road

MINUTES

Rob Gaudin, a consultant with Western Economic Services LLC, was present to explain the following power-point presentation:

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Slide 43 – 2008 Fair Housing Survey – Rockford Findings

When asked what groups are protected there was not a large number of people that responded with correct answers. There were 20 people who listed “low-income” which is not a protected class. He noted that “tenants” was listed but also isn’t a protected class.

Slide 44 – 2008 Fair Housing Survey – Rockford Findings

When asked about barriers to fair housing, a large number of people answered “yes” that they believe there are barriers to improving fair housing and that specific areas of the City have a problem. When asked if they think City policies, codes or regulations are adverse to fair housing, quite a few people answered “no.” Once again, there was a large number of “Don’t Know.”

Slide 45 – 2008 Fair Housing Survey – Rockford Findings

Mr. Gaudin explained that the list of Selected Fair Housing Concerns that were received contain many concerns that are not actually fair housing. They include landlord/tenant issues and housing /planning issues.

Slide 46 – 2008 Fair Housing Survey – Rockford Findings

It is clear that the city of Rockford does not have a good Fair Housing Complaint Referral System. Only a small number of people knew who to refer a complaint to.

Slide 47 – 2008 Fair Housing Survey – Rockford Findings

The survey showed that 142 people were not aware of any fair housing testing.

Mr. Gaudin explained that the intent was to determine if people were aware that fair housing testing exists and is done in Rockford.

Slide 48 – 2008 Fair Housing Survey – Rockford Findings

When asked if the fair housing ordinance should be strengthened, 52 said “yes”, 46 said “no” but 112 answered “Don’t Know.”

Slide 49 - – 2008 Fair Housing Survey – Rockford Findings

This slide showed that most of the residents are not aware of any fair housing planning by the city of Rockford.

Slide 50 – 2008 Fair Housing Survey – Rockford Findings

The current level of fair housing outreach and education is too little according to 96 residents. There were 70 residents that said there’s the right amount and 21 believe there’s too much.

Slide 51 – Rockford Housing Complaints – Fair Housing Complaints

The number of complaints submitted to the Illinois Department of Human Rights (IDHR) and/or U.S. Housing and Urban Development (HUD) has been extremely low since 2001. Mr. Gaudin explained that IDHR is a substantially equivalent agency which means that they have the authority to handle both the federal and state law violations. He also explained that communities of our size normally have around 600 complaints. He believes that our numbers are so low because we lack the necessary referral system or agency to handle complaints.

Slide 52 – Rockford Fair Housing – Mortgage Denial Rates

This chart only includes mortgages that the bank actually denied or approved and does not include any that did not close for another reason such as the applicant changed his mind or the application was incomplete.

Slide 53 – Rockford Fair Housing – Mortgage Denial Rates

Slide 54 – Rockford Fair Housing – Minority Mortgage Denial Rates

These charts show that most of the mortgage denials occurred in District 1 with a smaller number occurring in District 2.

Slide 55 – Rockford Fair Housing – Percent High-Interest Loans

HMDA data began including interest rate information in 2004. This chart shows that most of the high interest loans (predatory loans) occurred in Districts 1 and 2. There also were a few census tracts in District 3 with a large number of these loans. Mr. Gaudin explained that these loans increase the foreclosure risk in these areas. He noted that most of these loans occurred in 2006. They dropped off in 2007 and are mostly gone now. The problem will go away except for the people that already have these loans may be in

trouble and at risk for foreclosure. He noted that this study only covered new mortgages and did not include any refinances or home equity loans.

Slide 56 and 57 – 2009 Analysis of Impediments

Mr. Gaudin summarized that the City of Rockford's prospective impediments are:

- Insufficient fair housing system capacity
- Lack of effective referral system
- Lack of understanding of fair housing
- Distribution of sales is a concern
- Potential history of red lining or blockbusting
- Subprime and predatory loan targeting is evident

Slide 58 – Consolidated Plan and AI – Your Input is Needed

Mr. Gaudin explained that any questions or comments are welcome and after the meeting can be directed to himself, Dwayne Collins or Vicki Manson.

Question (citizen) – He noted that the data presented is through 2007 and there has been such a dramatic change in financing and economics in the last 18 months. How can we capture this and apply it to the plans being made?

Answer (Mr. Gaudin) – The predatory lending issue was highest in 2006, declined in 2007 and will be evaporated by the time the 2009 data comes out. The payday lenders and car loan guys are still out there and still threaten the wealth of someone trying to buy a house. The best thing we can do is educate people on how to operate in the credit market.

Question (citizen) – Sub-prime loans have always been a part of financing. Has there been an increase in the number of these loans? What are the percentages?

Answer (Mr. Gaudin) – There was a dramatic increase in the number of these loans nationwide. The percentages increased as much as from 12% to 33% from 2004 to 2006 in Los Angeles.

Question (citizen) – Do you attribute the increase in these numbers to some kind of bonus or reward received by the lenders for them?

Answer (Mr. Gaudin) – Yes

Question (citizen) – Do we know what the lenders received?

Answer (Mr. Gaudin) – Not in this data. You could get this information by using testers.

Question (citizen) – Is there a nationwide movement to educate the public against these practices?

Answer (Mr. Gaudin) – Yes, there is training available through local and state governments.

Question (citizen) – The amount of funding and resources available from the city for the Fair Housing Board for public education is inadequate.

Answer (Mr. Gaudin) - This is true but there are other grants available. Non-profits are eligible for FIP (initiative) funding. We would not be eligible for FAP (action) funding because we are not a “substantially equivalent agency”.

Answer (Dwayne Collins) – One thing we are struggling with is that there is not a separate agency outside of government that has been established to carry out fair housing activities. It is questionable whether this should be local, regional, or statewide.

Question (citizen) – There seems to be a decrease in vacant housing from the previous consolidated plan. Is this due to home ownership?

Answer (Mr. Gaudin) – There actually isn't a decrease. The lower number being referred to was just for "other" vacant, the ones not available for sale or rent. This is a concern because as we continue to build new units, the older units in the worse areas become more and more undesirable and prone to become part of this group.

Comment (Vicki Manson) - One thing that needs to be pointed out is that because we have a lower housing cost burden in the area it causes problems for redevelopment of housing. The cost to redevelop housing is about the same as in Chicago but the value of the finished housing is much lower.

Comment (Mr. Gaudin) – This is true, you have to use your resources in the most efficient manner. In the second public hearing the sentiment was for doing demolitions now and later figuring out what to do.

Question (citizen) - With the NSP funding in Chicago they are trying to have contractors rehab groups of houses in one area so that one doesn't get rehabbed and the others remain in poor condition. What is Rockford planning to do?

Answer (Vicki Manson) – The plan is to demolish 75 – 78 houses and then buy and rehab, or work with contractors to rehab, about 20 homes. We will also be applying for 2009 funding and part of the state funding. The 2008 funding is our first opportunity to be able to do that many demolitions and to assist people with higher than 80% of median income in order to deconcentrate some of the high poverty areas.

Question (citizen) – How many homes will this leave on the list to be demolished? Will it clean it up?

Answer (Vicki Manson) – No, this is just a drop in the bucket. There isn't an actual list, we work off of citizen complaints and constant staff inspections. It was suggested during the last consolidated plan that up to 1000 units per year should be demolished. This was based on the property conditions received from the assessor's office showing 5000 properties in extremely poor condition.

Question (citizen) – Wasn't it noted in the last consolidated plan that the housing stock is pretty old in certain areas. Are the 1000 per year the older homes?

Answer (Mr. Gaudin) - The demolition data received from 1980 - 2008 shows approximately 80 per year being done due to budget problems.

Comment (citizen) – It was noted that homes in this country are no longer being built to last a long time.

Comment (Mr. Gaudin) – With the lack of population growth there are too many new homes being built in the area which has increased the number of undesirable units and the number of abandoned units that need to be demolished.

Comment (Vicki Manson) – The number of single family building permits last year was much lower. This should help the rental stock which is in pretty bad condition. Landlords

are not maintaining their property because they don't have good tenants available. As the demand for their units increase they will make their units better.

Comment (citizen) – Landlords tend to not do anything to their property until it is absolutely necessary. It is up to the city to raise the standards and require landlords to provide decent affordable housing. We fall short by allowing the substandard housing to exist.

Answer (Vicki Manson) – That would require rental inspections which we don't have due to the lack of Home Rule.

Comment (citizen) – Education is necessary in the community regarding the complaint process, general finances, and overall life skills.

Comment (John Weaver, aldermanic candidate) – In response to a question on how to promote home rule, he stated that it is necessary to get the correct message out, that it is bigger than dollars and cents and taxation. It is the ability to address the social problems on a local level without having to go to the state. We are constantly behind because we have to wait to get laws changed through the state.

Comment (Mr. Gaudin) – It would be best for the city to have some kind of rental inspection program with some tools to force property owners to fix or tear down the property.

Comment (Rob Lamb) – If we had the rental inspection we would have landlords that would abandon their property so by solving one problem you may create another one.

Comment (Vicki Manson) – We need to change the reputation Rockford has for being an easy place to buy property cheap and make money on it.

Comment (citizen) – Rockford needs to set higher standards so that undesirable landlords know that they don't want to come here because they won't be able to make money if they have to follow the rules.

Comment (Vicki Manson) – You also have to consider the other side where a landlord rents a unit and the tenants trash it.

Comment (John Weaver) – Home Rule can address this also.

Comment (Mr. Gaudin) – Home Rule would allow eviction procedures to be tightened.

Mr. Gaudin thanked everyone for their attendance and participation. He noted that if anyone thinks of something else they can contact him, Vicki Manson or Dwayne Collins.

With no further questions or comments, the meeting ended.

APPENDIX G: 2008 HOUSING AND COMMUNITY DEVELOPMENT SURVEY DATA

Table G.1	
Primary Area of Interest	
City of Rockford	
2008 Housing and Community Development Survey	
Interest	Responses
Economic Development	90
Housing	77
Infrastructure	25
Public Services	23
Public Facilities	7
Other	17
Total	239

Table G.2					
Housing and Community Development Needs					
City of Rockford					
2008 Housing and Community Development Survey					
Need	No Need	Low Need	Medium Need	High Need	Total
Housing					
Affordable for-sale housing	19	60	74	80	233
Affordable rental housing	24	61	64	83	232
Disabled housing	19	55	89	67	230
Homeownership assistance	16	51	68	96	231
Residential rehabilitation	12	26	69	127	234
Senior housing	21	49	101	60	231
Funding for land trust	35	64	63	53	215
Economic Development					
Work force training	8	22	61	143	234
Local business support	5	14	51	163	233
Community Facilities					
Senior centers	24	56	93	60	233
Youth centers	15	28	70	120	233
Parks and recreation facilities	20	55	81	77	233
Healthcare facilities	27	56	74	71	228
Community centers	20	53	84	74	231
Historic preservation	26	64	82	56	228
Infrastructure					
Drainage improvement	11	40	74	107	232
Water/Sewer improvement	13	47	86	85	231
Street/Alley improvement	4	27	55	151	237
Street lighting	9	37	81	107	234
Sidewalk improvements	10	46	55	124	235
Special Needs					
Disabled centers/services	17	58	106	47	228
Accessibility improvements	15	64	93	55	227
Domestic violence facilities	16	52	81	79	228
Substance abuse facilities	26	48	63	91	228
Homeless shelters/services	32	45	67	88	232
Neglected/Abused child centers	21	35	73	99	228
Public Services					
Fair housing education	24	51	81	79	235
Renter training	22	45	74	89	230
Crime awareness	11	21	61	139	232

APPENDIX H: SUPPLEMENTARY PLAN DATA

BUREAU OF ECONOMIC ANALYSIS DATA

Table H.1
Total Employment and Real Personal Income

Winnebago County
BEA Data 1969 Through 2006, 2007 Dollars

Year	1,000s of 2007 Dollars						Per Capita Income	Total Employment	Average Real Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	4,138,171	286,463	-130,144	553,477	279,356	4,554,398	18,699	115,867	35,713
1970	4,004,820	271,402	-113,458	558,102	324,684	4,502,746	18,288	113,184	35,381
1971	3,903,780	271,079	-77,404	562,199	386,128	4,503,623	18,344	109,323	35,708
1972	4,212,037	310,418	-116,431	575,205	404,385	4,764,778	19,469	114,295	36,852
1973	4,580,716	389,433	-143,710	611,793	435,876	5,095,243	20,699	122,261	37,467
1974	4,591,007	407,533	-170,335	644,421	453,107	5,110,668	20,663	124,695	36,818
1975	4,333,549	367,689	-166,850	652,805	527,735	4,979,549	20,172	120,193	36,055
1976	4,596,835	398,095	-172,348	661,031	560,393	5,247,815	21,333	123,009	37,370
1977	4,818,463	424,036	-192,019	694,349	554,963	5,451,721	22,188	127,588	37,764
1978	5,091,313	463,054	-175,598	731,384	529,493	5,713,538	23,098	132,205	38,512
1979	5,209,251	490,205	-185,983	766,499	543,173	5,842,735	23,586	135,369	38,482
1980	4,936,532	462,282	-193,717	882,371	632,986	5,795,891	23,083	130,742	37,757
1981	4,886,222	487,319	-199,331	1,003,960	662,078	5,865,609	23,330	131,123	37,264
1982	4,515,138	454,279	-186,867	1,090,992	734,591	5,699,575	22,826	124,580	36,243
1983	4,388,757	446,040	-133,714	1,114,716	742,292	5,666,011	22,827	122,905	35,708
1984	4,805,137	505,594	-143,149	1,233,944	692,889	6,083,227	24,543	130,040	36,951
1985	4,942,319	526,746	-134,732	1,244,100	707,707	6,232,649	25,017	133,375	37,056
1986	5,107,822	551,899	-140,350	1,257,308	732,626	6,405,507	25,725	136,896	37,312
1987	5,308,971	565,344	-174,784	1,242,625	747,372	6,558,840	26,298	140,585	37,763
1988	5,611,234	614,029	-148,333	1,242,435	754,877	6,846,183	27,422	145,223	38,639
1989	5,672,640	621,701	-164,562	1,385,462	782,608	7,054,447	28,083	147,898	38,355
1990	5,696,413	628,885	-194,696	1,294,106	819,148	6,986,085	27,535	151,581	37,580
1991	5,657,553	636,795	-234,775	1,283,893	870,103	6,939,979	26,891	151,820	37,265
1992	5,823,971	648,805	-607	1,346,905	986,680	7,508,145	28,723	152,339	38,230
1993	5,931,904	674,902	-51,751	1,322,911	1,009,546	7,537,708	28,482	155,989	38,027
1994	6,278,952	727,408	-35,764	1,366,110	996,622	7,878,511	29,519	161,787	38,810
1995	6,563,260	760,665	-253,006	1,378,841	1,046,850	7,975,280	29,645	169,085	38,816
1996	6,676,642	767,390	-281,431	1,458,015	1,080,178	8,166,014	30,056	171,035	39,036
1997	6,857,398	787,697	-325,624	1,552,583	1,095,278	8,391,937	30,684	172,780	39,689
1998	7,138,939	811,311	-307,858	1,611,769	1,111,493	8,743,032	31,774	174,135	40,997
1999	7,218,037	813,734	-264,236	1,536,508	1,124,219	8,800,794	31,800	174,748	41,306
2000	7,292,666	808,458	-277,038	1,653,694	1,166,236	9,027,100	32,360	176,592	41,297
2001	7,011,612	785,969	-337,716	1,542,569	1,259,561	8,690,058	30,943	172,004	40,764
2002	7,080,489	788,583	-335,000	1,438,282	1,345,893	8,741,082	30,918	170,478	41,533
2003	7,142,671	788,114	-326,659	1,425,176	1,402,043	8,855,117	31,023	169,428	42,157
2004	7,141,401	803,481	-357,055	1,327,573	1,412,653	8,721,092	30,336	171,085	41,742
2005	7,117,218	817,507	-341,050	1,261,278	1,499,608	8,719,546	30,060	171,538	41,491
2006	7,117,847	817,927	-231,532	1,341,562	1,486,726	8,896,675	30,293	173,420	41,044

BUREAU OF LABOR STATISTICS DATA

Table H. Labor Force Statistics Winnebago County Bureau of Labor Force Statistics				
Year	Labor Force	Employment	Unemployment	Unemployment Rate
1990	142,120	134,450	7,670	5.4
1991	142,137	132,040	10,097	7.1
1992	143,911	132,525	11,386	7.9
1993	144,012	133,156	10,856	7.5
1994	147,057	139,200	7,857	5.3
1995	146,126	140,357	5,769	3.9
1996	147,684	141,084	6,600	4.5
1997	150,300	143,580	6,720	4.5
1998	148,737	142,309	6,428	4.3
1999	149,344	142,704	6,640	4.4
2000	146,466	139,718	6,748	4.6
2001	143,916	135,273	8,643	6.0
2002	141,289	130,897	10,392	7.4
2003	139,687	128,380	11,307	8.1
2004	140,294	129,839	10,455	7.5
2005	141,643	132,317	9,326	6.6
2006	145,783	137,758	8,025	5.5
2007	150,118	140,839	9,279	6.2