

THE HOUSING AUTHORITY OF COOK COUNTY, IL
DRAFT
AMENDMENT TO SENIOR DESIGNATED HOUSING PLAN OF 2009

RIVERDALE SENIOR, LLC
VILLAGE OF RIVERDALE, ILLINOIS



SUBMITTED BY:

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SUBMITTED TO:

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URBAN DEVELOPMENT (HUD)**
Office of Public and Indian Development
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OVERVIEW OF THE HOUSING AUTHORITY OF COOK COUNTY

The Housing Authority of Cook County, Illinois (HACC) is the second largest public housing authority in Illinois. Its jurisdictional scope and geographical territory, however, are quite large, since the County of Cook is the second largest geographical county in the nation, covering a total of 946 square miles. The HACC is responsible for administering low-income public housing and Housing Choice Vouchers in 120 communities in the northern and southern suburbs of Cook County, excluding the City of Chicago and other municipalities that have local public housing agencies.

Within its jurisdiction, HACC manages 2,066 units of low-income conventional public housing, of which 681 are family units. The remaining 1,385 units are targeted for elderly, near-elderly and disabled families located in 13 high-rise buildings. Currently, HACC has an active Senior Designated Housing Plan (SDHP) approved by the U.S. Department of Housing and Urban Development (HUD) on April 16, 2009, in which six (6) high rise buildings are designated for seniors, with a total of 569 designated units (see Table 4.1a below). All remaining high rise buildings and units are mixed population buildings (see Table 4.1b). HACC also administers approximately 12,359 Housing Choice Vouchers (HCV's) for eligible low income families.

I. INTRODUCTION AND STATEMENT OF CERTIFICATIONS:

The Housing Authority of the County of Cook (HACC) submitted its SDHP for HUD approval, and said plan was approved on or about April 16, 2009. We respectfully request and submit this Amendment to the SDHP of 2009, to add a total number of 35 units in the Village of Riverdale, County of Cook, as further delineated below.

HACC owns a 501c (3) not-for-profit development entity, Turnstone Development, that was organized to help facilitate HACC's efforts to promote and provide housing opportunities to low income and Section 8 eligible families in need of housing assistance throughout suburban Cook County. Turnstone Development has partnered with HACC and successfully accomplished this mission by acting as developer and co-developer of approximately 1,100 affordable housing units over the past ten (10) years. HACC and Turnstone Development have focused on providing decent, safe and sanitary housing for low-income seniors, families with children and persons with disabilities. During the past five (5) years, HACC and Turnstone Development have created over 1,000 affordable units targeted for families with children and persons with disabilities within Whistler Crossing Apartments, Thornwood Apartments, Hunter-Pheasant Ridge Apartments and Wisdom Village. HACC and Turnstone Development have also made available several hundreds of affordable units for elderly and near-elderly seniors. HACC and Turnstone Development created an additional 46 affordable units for families with children and persons with disabilities through its Project Opportunity Program.

The Riverdale Senior LLC is a new re-development activity of HACC and Turnstone, and is the product of mixed income redevelopment, including Cook County's HOME funds and the American Recovery and Reinvestment Act (ARRA funds). This building is currently vacant and will be the subject of a complete gut rehabilitation. This building is not currently nor was it ever owned by the HACC, but it is owned by HACC's instrumentality, Turnstone Development, LLC. Thirty-five (35) one bedroom units will be Low Income Public Housing, one bedroom units. Seventeen (17) additional units will be project based, subject to age restrictions under its respective regulations.

We hereby submit several certifications, as Attachment 1 to this Amendment.

HACC submitted the Agency Plan for fiscal year 2010-2011 and is awaiting HUD approval of same. While this Amendment to the SDHP is consistent with the spirit of HACC's Agency Plan for the current fiscal year, in that the Riverdale Senior LLC was noted in the Agency Plan as an upcoming re-development and mixed finance activity of HACC, it was not expressly stated as a planned senior designation. Therefore, attached to this Amendment and made part hereof as Group Attachment 2 and in further compliance with 24 CFR 935.20 et seq., you will find a Notice of Public Comment and Public Meeting held in the Village of Riverdale, and all comments received from the public, as well as HACC's responses and evidence of consultation with the required stakeholders.

II. JUSTIFICATION FOR DESIGNATION:

1. Statement of Current Demand:

A. Jurisdiction-wide Demand:

HACC and its instrumentality, Turnstone Development, LLC believe that it is essential to provide elderly-only housing that is organized and managed according to the special needs of this growing population. HACC and Turnstone wish to remain consistent with the well-documented needs of this aging group in our County and develop consolidated and comprehensive plans that advance the goals of the Consolidated Plan of the County of Cook, to prepare housing for elderly families in the future. In further support for this position, please note the following:

- 1) In Cook County 48% of renters age 62 and older reported spending more than 30% of their income on rent and paying an average of \$764.00 monthly for rent.¹
- 2) Within this environment, Cook County's elderly residents are actively seeking affordable housing options throughout the county and surrounding areas.
- 3) The Illinois Housing Development Authority's 2007 Consolidated Plan Performance Report indicates the low-income elderly population continues to be an underserved population and the development or rehabilitation of affordable housing for this population remains a priority for the State of Illinois (including the County of Cook).
- 4) The County of Cook invested the majority of its HOME Funds in the development and rehabilitation of affordable senior units during 2007 and 2008, and fulfilled one of its stated goals in the Consolidated Plan of 2005-2009. See the information below in B- 2-a. for detailed demographic information of the need in the public housing list.

B. Demand in Riverdale, IL:

- a. Demand for senior housing in the Village of Riverdale is strong. While there are affordable housing buildings for seniors in the general market area, there is no public housing senior designated facility in the Village at this time.
- b. From those affordable housing units that exist in the general market area, the buildings' occupancy rates exceed an average of 95%; and several of the affordable housing buildings have 100% occupancy rate and waiting lists.²
- c. In 2009, there were an estimated 13.5% of persons aged 55 and older in Riverdale, and 20.3% of persons 55 and older in the Market Area.³ These numbers are expected to grow with the 2010 Census information.

¹ American Housing Survey for the Chicago Metropolitan Area: 2003.

² American Marketing Services, Inc., Report of Site Inspection and Market Analysis, Chicago, Illinois, December 30, 2009.

³ Ibid, page 10

C. Waiting List Analysis and Future Occupancy Potential of HACC

1) The elderly housing demands and market growth patterns are also supported by the number of senior citizens waiting for public housing or a voucher in Cook County.

2) The HACC maintains a centralized waiting list for public housing applicants and the list is currently closed. However, the list was updated in 2008 and was then opened from December 1, 2009 until January 29, 2010. The pre-application allows the applicant to self-certify that he/she has a disability and any specific unit features the applicant requires. This is a voluntary disclosure since HACC understands that no inquiry into a person's disability is allowed. Disability is verified when the applicant reaches to top of the wait list. This helps facilitate HACC's ability to assess reasonable accommodations that HACC may need to provide to applicants. The waiting list for public housing currently reveals that:

- a. Total number of applicants currently on the public housing wait list are 6,182;
- b. Elderly applicants (age 62 and over) are 494, and comprise 8.1% of the list;
- c. Near Elderly (between the ages of 50-61) comprise 13% of the list;
- d. Non-elderly disabled totals comprise approximately 20% of the list, however of those numbers more than 50% are near elderly (between the ages of 50 and 61);
- e. All others comprise 58.9% of the list.

3) After completing its required annual purge of its HCV waiting list in January 2008 HACC currently has a total of 15,254 applicants on its HCV waiting list:

- a. Elderly Applicants (age 62 and over) comprise approximately 9.0% of the list
- b. Near elderly (disabled and non-disabled) comprise 13.0% of the list
- c. Non-elderly (or young) disabled comprise .75% of the list:
- d. All others comprise 77.25% of the list

4) HACC's policies allow for preferences to disabled families, as follows:

- a. The Administrative Plan for the HCV Program provides a preference for admissions to working families and to elderly and disabled persons as the highest single preference for leasing.
- b. The Admissions and Continued Occupancy Policy (ACOP) provides a preference for admissions to Seniors and Persons with Disabilities as the highest ranked preferences for leasing.
- c. Additionally, the ACOP allows HACC to open the wait list to target specific populations (Chapter 4, Part II.C.)
- d. HACC's housing application allows applicants to voluntarily identify themselves as disabled, and to specify if they require accessible features in a unit.

D. Consistency with the Jurisdiction's Affordable Housing Strategies

1) Cook County's strategy for providing affordable housing is outlined in the Consolidated Community Development Plan for 2005-2009.

- a. The Housing Authority of Cook County and the Cook County Department of Planning and Development worked together and provided information on the public housing needs and priorities contained in the Consolidated Plan Of 2005-2009, and the HACC will continue to be a vital partner with the Cook County Department of Planning and Development in the design and implementation of current and future Consolidated Plans.

- b. The Village of Riverdale indicates there is a priority for affordable housing for its elderly residents, and have openly supported this Amendment to SDHP.

2) HACC's proposed Designated Housing Plan is:

- a. Critical to ensure that future housing needs of the elderly in Cook County are met; and,
- b. Necessary to assist in achieving the housing goals of the jurisdiction under the Cook County Consolidated Community Development Plan for 2005-2009.

2. Other Factors Supporting the Proposed Designation in Riverdale:

a. In addition to the increasing need for decent, affordable housing for the elderly, the buildings proposed for designation was selected based on issues relevant to design, composition and access.

b. HACC has entered into a Voluntary Compliance Agreement (VCA) with the U.S. Department of Housing and Urban Development (HUD) in which it is committed to increasing the number of accessible units in accordance with the Uniform Federal Accessibility Standards (UFAS) in its housing portfolio. The Riverdale Senior LLC entails a major rehabilitation in which HACC and Turnstone plan to exceed the number of UFAS units requirement. As in the former SDHP, the UFAS accessible units will be leased to persons who need the features, first to seniors (with the appropriate need for the features), then to near elderly (with the appropriate need for the features) then to persons with disabilities with the appropriate need for the features, (whether they are elderly or not).

c. HACC submitted an application to HUD on January 30, 2009 for rental assistance Housing Choice Vouchers for non-elderly persons with disabilities. The notice of award from HUD was received on July 09, 2009, and HACC has been approved for approximately 100 vouchers under the FY2008 Designated Housing Program. To date, 73 persons have already leased with the Housing Assistance to Non-Elderly Disabled Persons Vouchers, 7 were ineligible and 24 persons are actively seeking housing with those vouchers. HACC has also submitted a new application to Notice of Funding Availability (NOFA) for an additional 200 vouchers for rental assistance to non-elderly persons with disabilities for both Category 1 and Category 2 (persons who are in nursing homes and institutions) and awaits a positive response.

d. HACC is also exploring the feasibility of creating a special set-aside program for persons with disabilities by utilizing a small percentage of its current available voucher capacity for modifications of private units.

III. PROJECT DESCRIPTION AND SUPPORTING DATA:

A. Project Description

Turnstone Development has acquired a 50-unit vacant property located at 335 West 138th Street in Riverdale, Illinois. Turnstone Development plans to fully renovate the property to provide 52 units for seniors aged 62 and older. There will be 43 one bedroom units and 9 two bedroom units. Turnstone Development secured a \$2.1 million financial commitment from the Cook County Department of Planning and Development in HOME funds and a \$4.7 million financial commitment from the Housing Authority of the County of Cook (HACC) using the Federal Stimulus "ARRA" funds.

Turnstone Development will designate 35 units as public housing units targeting applicants at or below 50% of AMI on HACC's Public Housing waiting list. The remaining 17 units of the property will be operated as Project Based Voucher (PBV) units targeting applicants at or below 50% Area Median Income (AMI) on HACC's Housing Choice Voucher (HCV) waiting list. These project based units will be

subject to administration by another entity pursuant to the requirement in 24 CFR 983.59. The Housing Authority of Cook County, Illinois is requesting, through this proposed Designated Housing Plan, to operate the 35 units as senior designated housing, for residents whose head, co-head or single head of household are 62 years of age or older at the time of leasing. This would represent an amendment of the Senior Designated Housing Plan approved by HUD on April 16, 2009, under which the following buildings have been designated for Seniors:

Table 4.1a. – Buildings That are Currently under an Active Elderly-Only Designation Plan (2009)

IL NO	PROJECT NAME	ADDRESS	CITY/STATE/ZIP	0 BR	1 BR	TOTAL PROPOSED UNITS
IL025-08	Edward Brown	3210 W 139 th Street	Robbins, IL 60472		72	72
IL025-09	Golden Tower I	1704 East End	Chicago Hts, IL 60411	13	53	69
IL025-13	Juniper Tower	350 Juniper	Park Forest, IL 60466		105	105
IL025-22	Golden Tower II	1706 East End	Chicago Hts, IL 60411		57	57
IL025-24	Turlington West Apartments	15306 Robey	Harvey, IL 60426		149	149
IL025-18	Franklin Park Tower	9535 Franklin Ave	Franklin Park, IL 60131		125	125
Total				13	556	569

Table 4.1b. –Buildings Remaining As Mixed-Population, as follows:

Table 4.1b. Buildings Remaining as Mixed-Population Buildings:

PROJECT #	PROJECT NAME	ADDRESS	CITY/STATE/ZIP	1BR	2BR	TOTAL UNITS
IL 25-11	Huntington Apartments	9201 Maryland Street	Niles, IL 60714	126	1	127
IL 25-15	Armond D. King Apts	9238 Gross Point Rd	Skokie, IL 60076	126	1	127
IL 25-19	Jane R. Perlman Apts	1900 Sherman	Evanston, IL 60201	100	1	101
IL 25-20	Henrich House	1301 Ashland Ave	Des Plaines, IL 60016	128	1	129
IL 25-23	Albert Goedke	215 Miner St	Arlington Hts, IL 60005	118	1	119
IL 25-30	Wheeling Towers	200 N. Milwaukee Ave	Wheeling, IL 60090	99	1	100
IL 25-20	Victor L. Walchirk Apts	2300 Noyes Ct	Evanston, IL 60201	99	1	100
Total				796	7	803

The Riverdale Senior building will have the following design features:

- Elevators
- Keyless entry system
- Automated door entry system
- In-Camera 24 hour monitoring
- Wheelchair accessible units
- Lighted parking lots
- Wheelchair accessible parking lots
- Strobe lights for hearing impaired
- Braille elevator signage
- Sign language interpreters as needed

Additionally, there will be planned senior activities, as follows:

- Tenant Orientation
- Linkages to services
- On-site senior services, including wellness care and nursing

The building will have the following amenities:

- Laundry room
- Congregate dining and community room
- Fitness room
- Library/computer room

The building is close to public transportation and retail and basic consumer services may be found within walking distance. The building is also close to places of worship in the Village of Riverdale, with several churches within a five block radius. Finally, there are two hospitals nearby: Metro South Medical Center being 3.6 miles to the northwest and Ingalls Memorial Hospital in Harvey, IL is only 4.2 miles southwest of the building. The building is also conveniently close to parks and other recreational facilities, and the area in general is undergoing redevelopment and reinvestment.

B. Accessible Unit Information at Property

RIVERDALE ACCESSIBLE UNITS

ACCESSIBLE		ADAPTABLE	SENSORY
101 – 1 BED		203 – 1 BED	205 – 1 BED
102 – 1 BED		207 – 1 BED	409 – 2 BED
103 – 2 BED		303 – 1 BED	
		307 – 1 BED	
		403 – 1 BED	
		407 – 1 BED	
		503 – 1 BED	
		507 – 1 BED	

C. Current Resident and Building Profiles

Based on current historical agency-wide and building specific occupancy data, HACC does not anticipate that approval of this Amendment to the Senior Designated Housing Plan will negatively impact the overall, authority-wide occupancy levels. The building proposed for elderly-only designation has not housed any public residents before. As can be seen in Table 4.3a, near-elderly, non-elderly disabled, and all others are served by HACC at all properties and the distribution of numbers shows that the need for elderly designation remains. While there are vacancies at a Senior Designated property (Golden Towers), these are the result of ongoing rehabilitation at the building, whereby the Authority is allowing the vacancy so that seniors (and/or disabled) occupants of the building may be able to be relocated within the building and not at other properties. The below table contains the current demographics of the Senior Designated buildings.

Table 4.3a – Senior Designated Buildings’ Demographics

Population Type	IL 25-08 Edward Brown	IL 25-09 Golden Towers I	IL 25-13 Juniper Tower	IL 25-22 “Golden Tower II	IL 25-24 Turlington West	IL 25-18 Franklin Park	Percentage
Elderly	33	23	51	26	49	64	56.5%
all Non-Elderly Disabled	28	25	31	17	52	34	43.5%
All other	0	0	0	0	0	0	0
TOTALS*	61	48	82	43	101	98	100%

* Totals as of 07/01/2010

Table 4.3b – All Other LIPH Buildings’ Demographics

MIXED POPULATION DEVELOPMENTS	RESIDENT DEMOGRAPHICS			VACANCIES		
	ELDERLY	NON-ELDERLY DISABLED	OTHER	TOTAL UNITS LEASED	TOTAL UNITS VACANT	TOTAL UNITS
IL 25-11 - Niles (9201 Maryland)	105	20	0	125	1	126*
IL 25-15 - Skokie (9238 Gross Point Rd.)	116	10	0	126	0	126*
IL 25-19 - Evanston (1900 Sherman)	61	38	0	99	1	100*
IL 25-20 - Des Plaines (1301 Ashland)	88	33	0	121	7	128*
IL 25-23 - Arlington Hts. (215 Miner)	88	23		111	7	118*
IL 25-30 - Wheeling (200 N. Milwaukee)	95	3	0	98	1	99*
IL 25-31 - Evanston (2300 Noyes Ct.)	63	25	2	90	9	99*
Totals	616	152	2	770	26	796
FAMILY DEVELOPMENTS	RESIDENT DEMOGRAPHICS			VACANCIES		
	ELDERLY	NON-ELDERLY DISABLED	OTHER	TOTAL UNITS LEASED	TOTAL UNITS VACANT	TOTAL UNITS
IL 25-01 - Chicago Hts.	1	0	9	10	5	15
IL 25-02 - Chicago Hts.	2	0	22	24	13	37
IL 25-03 – Summit	0	0	0	0	0	35
IL 25-04 – Robbins	6	14	55	75	27	100
IL 25-05 - Chicago Hts.	10	3	74	87	33	120
IL 25-06 - Ford Hts.	4	8	38	50	50	100
IL 25-07 - Ford Hts.	8	22	39	69	47	116
IL 25-12 – Robbins	3	8	46	57	43	100
IL 25-29 - Evanston Scattered Sites	3	2	13	17	2	19
IL 25-98 - Evanston Scattered Sites	5	21	0	26	0	26
IL 25-99 - Wheeling Scattered Sites	2	0	9	11	2	13
Totals	44	78	305	427	254**	681
GRAND TOTALS	660	230	307	1197	280	1477

*Total units in Mixed Population developments do not include 2- bedroom units (all occupied by live-in custodians).

**Family housing vacancies are related to demolition applications, one granted (Summit) and two pending (Robbins and Fort Heights)

Table 4.3c - all Low Income Public Housing Buildings by Bedroom sizes

ELDERLY/MIXED POPULATION DEVELOPMENTS	BEDROOM SIZE						TOTAL UNITS
	0 BR	1 BR	2 BR Unit*	3 BR	4 BR	5 BR	
IL 25-08 - Robbins (3210 W. 139th St.)		74	1				75
IL 25-09 - Chicago Hts. (1704 East End)	13	56	1				70
IL 25-11 - Niles (9201 Maryland)		126	1				127
IL 25-13 - Park Forest (350 Juniper)		105	1				106
IL 25-15 - Skokie (9238 Gross Point Rd.)		126	1				127
IL 25-18 - Franklin Park (9535 W. Franklin)		125	1				126
IL 25-19 - Evanston (1900 Sherman)		100	1				101
IL 25-20 - Des Plaines (1301 Ashland)		128	1				129
IL 25-22 - Chicago Hts. (1706 East End)		57	0				57
IL 25-23 - Arlington Hts. (215 Miner)		118	1				119
IL 25-24 - Harvey (15306 Robey)		149	1				150
IL 25-30 - Wheeling (200 N. Milwaukee)		99	1				100
IL 25-31 - Evanston (2300 Noyes Ct.)		99	1				100
Totals	13	1362	12	0	0	0	1387
FAMILY DEVELOPMENTS	BEDROOM SIZE						TOTAL UNITS
	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	
IL 25-01 - Chicago Hts.			9	6			15
IL 25-02 - Chicago Hts.			19	8	10		37
IL 25-03 - Summit		4	14	12	5		35
IL 25-04 - Robbins		24	28	30	18		100
IL 25-05 - Chicago Hts.		40	40	32	8		120
IL 25-06 - Ford Hts.		8	20	44	24	4	100
IL 25-07 - Ford Hts.		28	20	32	24	12	116
IL 25-12 - Robbins			32	42	20	6	100
IL 25-29 - Evanston Scattered Sites			8	7	4		19
IL 25-98 - Evanston Scattered Sites			8	16	2		26
IL 25-99 - Wheeling Scattered Sites			12	1			13
Totals	0	104	210	230	115	22	681
GRAND TOTALS	13	1466	222	230	115	22	2068

*All 2 bedroom units in Elderly and/or Mixed Population buildings are used by live-in custodians, not leased to residents

D. Near-Elderly Option

HACC is proposing to retain the option to house near-elderly families aged 50 to 61 years (the “Near Elderly”) in the designated building should there occur a shortage of elderly families on the waiting list or if a unit(s) in an elderly building is vacant for 60 days or longer. With the number of elderly families currently on the waiting list and the very low turnover rate in the proposed buildings, HACC anticipates that this option will be rarely exercised.

E. Additional supportive Services:

Property management will be responsible for managing all supportive and social service activities and referrals. Among the management and coordinators’ key responsibilities will be making referrals and linking residents to social service agencies equipped to address any age/ability specific needs common to this age group. It is important to note that several community-based organizations and service providers have already shown support for the project and stand ready to provide services, such as Age Options, Catholic Charities, Healing Hands Home Care and the Progress Center for Independent Living, just to name a few.

F. Impact of Designation on Time Spent on the Waiting List

HACC anticipates that there will be a positive impact on the average length of time that elderly applicants are on the wait list. As to or non-elderly disabled applicants HACC anticipates there will not be a notable negative impact on the waiting list time. Over the last year, HACC has housed from its conventional public housing waiting list and the Housing Choice Voucher list an average of 80 non-elderly disabled applicants. Additionally, HACC has aggressively increased resources and housing options by zealously managing the vouchers received for rental assistance to near elderly persons with disabilities in that by the end of this year HACC hopes to be at 100% utilization.

The annual turnover rate for elderly residents at HACC is approximately 1 per cent. This will result in approximately only 16 units per year that will need to be reoccupied. This low turnover combined with the ample number of elderly applicants (as specified in section II-C-2 above) will ensure that elderly only units will remain fully occupied.

Current public housing waiting list data is illustrated in Table 4.4a – Current Applicant Status:

Table 4.4a Public Housing Wait List– as of -Current Applicant Status

Population Type	Total	% of Total Population
Elderly	494	8.00%
Near-Elderly	873	13.00%
Non-Elderly Disabled* (includes 452 near elderly disabled)	1,234	20.00%
Other	4816	59.00%
TOTALS	6,182	100.00%

Table 4.4b HCV Wait List as of 04/10/2010– Current Applicant Status

Population Type	Total	% of Total Population
Elderly	1227	8.04%
Near-Elderly Disabled	67	0.44%
Young Disabled	115	0.75%
Near-Elderly	1939	12.71%
Other	11906	78.05%
TOTALS	15254	100.00%

G. Admissions and Continued Occupancy Policies and Procedures

This is a vacant building which is part of a substantial rehabilitation made possible from mixed financing development. The tenant selection policies applicable to this building are found in HACC's Admissions and Continued Occupancy Policy (ACOP) or the Authority's waiting list procedures. HACC's ACOP already contains provisions that address designated housing. The ACOP will be revised in 2010 to include an updated list of elderly-only properties available at HACC.

H. Fair Housing and Anti-Discrimination Policy

The proposed designation of this building is in full compliance with the terms and conditions of the Fair Housing Act as HACC or Turnstone have not discriminated in any way with regards to protections afforded under the Act. In addition, HACC and Turnstone have determined, based on the most recent census demographics that designating the building as elderly only will in no way increase minority concentrations in the community of Riverdale, IL.

In the VCA signed by HACC and HUD on April 26, 2010 HACC has committed to making additional number of accessible units, which will be leased to seniors or non-elderly persons with disabilities. HACC has also committed to a set aside a portion of its administrative fees for operating its Housing Choice Voucher program to fund reasonable structural modifications needed to voucher holders with disabilities to enjoy units they have rented or hope to rent from participating landlords in the private market.

HACC completed substantial modernization work at the Golden Towers I and Edward Brown developments that triggered 504 UFAS requirements and completed 8 accessible units. (See attached Chart). These units have been excluded from the Designated Housing Plans. These units will be made available on a first come first serve basis to residents/applicants demonstrating a need for the unit features to accommodate their disabilities.

Also as part of the VCA, HACC will be conducting a transition plan, as well as a retrofitting schedule, in which HACC plans to procure an independent third-party consulting firm with extensive knowledge of 504 UFAS requirements to implement a modification plan to mitigate deficiencies noted by HUD as provided in the VCA, and will increase the number of UFAS compliant units in the next five years.

I. Consultation with Impacted Community:

While the building has never been a public housing development and is currently a vacant building, and thus, no public housing residents were displaced or negatively impacted by the designation, HACC has notified the public of a 30-day public comment period, and a public hearing has been scheduled for July 14, 2010, at the Village Hall in Riverdale, IL.

HACC published a notice of the 30-day public comment period and public hearing dates and times on HACC's website and in newspapers widely circulated in the communities where the target building is

located. All comments and suggestions received at these meetings will be considered in the submission of this Amendment to the Senior Designated Housing.

Final Comments and suggestions must be received by HACC by 4:30pm on August 6, 2010 at the Central Administrative Office located at 175 West Jackson Blvd., Suite 350, Chicago, IL 60604 or via fax (312) 692-0115.

Public notices of the meetings were provided through direct written communications to stakeholders and meeting announcements were posted in several community areas. Comments and suggestions received at the Public Hearings were considered in the preparation of the Draft Designated Housing Plan released for public comments. (See attachments.)

IV. HOUSING ALTERNATIVES AND SERVICES FOR IMPACTED POPULATIONS

While the current building will have no impacted residents, HACC and its development instrumentality Turnstone, recognize the need to mitigate the impact on the non-elderly applicants who would have been able to be admitted to the building. For this reason, HACC has identified adequate alternative housing options, as follows:

A. Housing Resources Available

1) HACC participates in several Project Based or Housing Choice (section 8) special programs that provide additional housing resources to non-elderly disabled persons.

2) Set-Aside Fund for Modification in Private Housing: HACC has signed the VCA with HUD and has committed to a set-aside of a portion of its administrative fees for operating its Housing Choice Voucher program to fund reasonable structural modifications needed to voucher holders with disabilities to enjoy units they have rented or hope to rent from participating landlords in the private market.

3) Waiting List Placement

a. Applicants in the impacted groups will not lose their place on the waiting list and will be offered a unit in one of HACC's family developments.

b. In addition, should HACC decide to adopt site-based waiting lists, impacted near-elderly applicants will be offered the option of placement on one of the site-based waiting lists for an elderly building and remain on the list until reaching the age of 62.

c. For the elderly-only developments, preference for admission will be given to elderly families.

1. Near-elderly applicants will be housed when there are an insufficient number of elderly applicants on the waiting list.

d. Unit assignment procedures for impacted applicants will be made in accordance with HACC's Admissions and Continued Occupancy Policy (ACOP).

e. The ACOP currently states that a full range of bedroom sizes will be maintained in HACC's family developments, and units at these developments will be available to elderly families (head or spouse or sole member is 62 years of age or older), disabled families (head or spouse or sole member is a person with disabilities), and other families depending on unit size requirements of the particular applicant.

4) Request an UFAS-Accessible Unit in a Family Property
(current residents and applicants)

Impacted residents and applicants with disabilities who require an accessible unit have the option to request an accessible unit. HACC will continue to increase the number of Section 504 units in its family developments as part of the VCA and the transition plan and impacted residents and applicants will have the option to request a Section 504 compliant unit.

Section 5-II.E. of the Authority's ACOP states the following:

"When an accessible unit becomes vacant, and before offering such units to a non-disabled applicant HACC must offer such units:

First, to a current resident of another unit who has a disability that requires the special features of the vacant unit and is occupying a unit not having such features, or if no such occupant exists, then

Second, to an eligible qualified applicant on the waiting list having a disability that requires the special features of the vacant accessible unit."

HACC's ACOP further states that,

"When offering an accessible unit to a non-disabled applicant, HACC will require the applicant to agree to move to an available non-accessible unit within 30 days when either a current resident or applicant needs the features of the unit and there is another unit available for the non-applicant family. This requirement will be a provision of the lease agreement."

Transfer requests to accessible units from disabled non-elderly residents of the target buildings proposed for elderly-only designation are considered high priority transfer requests (see Chapter 12 of HACC's ACOP) and will take priority over new admissions.

HACC will, as needed, retrofit additional units with the necessary adaptations to accommodate the needs of persons with disabilities should the demand for such units exceed the current inventory of accessible units.

Inventory of HACC’s UFAS-Accessible Units by Family Developments is illustrated in Table 5.1 – Inventory of UFAS-Accessible Units as follows:

Table 5.1a – Inventory of UFAS-Accessible Units – Family Developments

Project	ADA Compliant	Adaptable	ADA Public Washrooms	Accessible Office
III. 25-1	-	-	-	Yes
III. 25-2	-	-	-	Yes
III. 25-3	2	-	2	Yes
III. 25-4	1	-	2	Yes
III. 25-5	4	-	-	Yes
III. 25-6	-	-	-	Yes
III. 25-7	3	-	-	Yes
III. 25-19B	-	-	2	Yes
III. 25-29A	-	-	2	Yes
III. 25-30B	-	-	2	Yes

5) Alternative Subsidized Housing

In addition to the affordable units that HACC and Turnstone Development have made available, HACC has identified properties within its jurisdiction suitable to accommodate the housing needs of the non-elderly residents affected by the designation. Among the housing alternatives available are: privately owned subsidized senior citizen properties, a housing project under the National Affordable Housing Act of 1990, as amended by the Housing and Community Development Act of 1992 for persons with disabilities (known as Section 811) and subsidized properties that cater to the disabled.

In addition, HACC has a long list of community partners to which residents will be referred, upon request, including agencies that provide or can assist in locating housing for disabled persons or families. HACC’s membership in the Regional Housing Initiative (RHI) will also be instrumental in identifying housing alternatives. Established in 2002, the RHI is a consortium of the Chicago, Cook County and Lake County Housing Authorities formed to encourage the construction of affordable housing and supportive services in the Cook County metropolitan area.

See Table 5.2a – Alternative Subsidized Housing and Table 5.2b – Alternative Housing Partners on following pages:

6) Contact for Questions on the Plan

Persons who can be contacted with discussions or questions on this plan are: Lorri Newson, Executive Director; Roland Lara, General Counsel, and Lillian Fuentes, ADA/Section 504 Compliance Coordinator. All decisions will be made by the Executive Director before finalized.

Table 5.2a – Alternative Subsidized Housing

Name of Facility	Street Address	City	Contact Name	Phone No.	Units Available	Waiting List	Waiting Period
Anchor House	1230 W. 76th Street	Chicago		773-651-0757	0	Unknown	
Austin YMCA	501 N. Central	Chicago		773-326-2775		Unknown	
Avenues of Independence for Developmentally Disabled Adults	8842 Prospect Ave	Niles		847-541-5250	no	Open	varies
Avenues of Independence for Developmentally Disabled Adults	9021 N. Clifton Ave	Niles		847-825-6498	no	Open	varies
Blue Cap (Core)/Blue Island II	12602 S. Artesian	Blue Island		708-389-0596		Unknown	
CEDA/Jefferson Program	1380 Jefferson Street	Des Plaines		847-392-2332	1	Open	
Cedar Village	320 W. Campbell St.	Arlington Hts.	Sandy	(847)506-1010	none	open	unknown
Claridge Apartments	319 Dempster Street	Evanston		847-251-5746		Open	
Connections for Homeless	2010 Dewey	Evanston	Alberto Mendoza	847-424-0945	0	Closed	unknown
Cooke's Manor (for Veterans)	Bldg. 14, 5th Ave & Roosevelt Rd.	Hines		312-655-7305			
Deborah's Place II	1530 N. Sedgwick	Chicago		773-638-6490		Unknown	
Deborah's Place III	2822 W. Jackson Boulevard	Chicago		773-722-2260		Unknown	
Ebenezer Primm Towers	1001 Emerson street	Evanston	Reverend Robert Thomas	847-864-0052	4	Open	1-2 YEARS
Emerald House	12231 S. Emerald	Chicago		773-291-0482		Unknown	
Garden View Apartments	1235 S. Sawyer Avenue	Chicago		773-522-1522		Unknown	
Greenview Apartments	6451 N. Greenview	Chicago	Jeong Shin	773-465-5770		Open	4-12 mths.
Greenway Park	6224 S. Kimbark Avenue	Chicago	Vanessa Williams	773-324-9025		Unknown	
HOME 328 Custer Street	328 Custer Street	Evanston		847-866-6144	0		
HOME FIRST	2120 Jackson Street	Evanston		847-866-6144	0		
Housing Opportunity Development Corporation	1000 Skokie Blvd	Wilmette	Jessica Hotaling 847-251-5706		0	Open	varies
Housing Opportunity Development Corporation	9016 Waukegan Road	Morton Grove	H.O.D.C.	847-251-5746	no	Closed	several years
Housing Options for the Mentally Ill	2010 Dewey	Evanston	Erin Myslenski	847-866-6144	0	Closed	2-3 years
Independence House	810-824 S. Independence Blvd.	Chicago		773-826-0990	0	Open	30 days
Interfaith Housing-Home Sharing	620 Lincoln Ave	Winnetka	Jackie Grossman	847-501-5760	2	Open	varies
Jacob Blake Manor	1615 Emerson street	Evanston	D-Jyana Jones	847-570-4850	3	Open	varies

Table 5.2a – Alternative Subsidized Housing continued

Name of Facility	Street Address	City	Contact Name	Phone No.	Units Available	Waiting List	Waiting Period
Karibuni Place (TIA)	8200 S. Ellis	Chicago		773-873-0708	0	Open	1 week
Kransow Residence	8901 Gross Point Road	Skokie	Entry Dept.-CJE	773-508-1000	5	Open	varies
Laffin Apartments	1512 W. 79th Street	Chicago		773-723-5400			
Lath Permanent Housing		Multiple		708-698-5500		Unknown	
Lawson YMCA	30 W. Chicago	Chicago		312-944-6211			
Leland Apartments	1207 W. Leland Avenue	Chicago		773-561-5410			
Linden Place	700 E. Golf	Arlington Hts.	Liz Asota	(847)228-1212	none	Closed	unknown
Major Jenkins Apartments	5012 N. Winthrop	Chicago		773-506-3488			
Malden Arms	4727 N. Malden	Chicago		312-447-4662			
McGaw YMCA Men's Residence	1000 Grove Street	Evanston		847-475-7400			
Menard Apartments	334 N. Menard	Chicago		773-261-1136			
Miriam Apartments	4707 N. Malden	Chicago		312-447-4662			
Near North Apartments	1244 N. Clybourn Avenue	Chicago		312-867-0728	0	Closed	
North Avenue Limited Partnership	4250 West North Avenue	Chicago		312-660-1373			
North Shore Homes-Developmentally Disabled Only		Skokie	Kate Jesco	847-982-2030	3	Open	varies
Oak Leyden Developmental Services	10013 Nevada	Franklin Park		847/451-6752	none		
Oak Leyden Developmental Services	3221 Dora St.	Franklin Park		847/671-4643			
Oak Leyden Developmental Services	3035 Hawthorne	Franklin Park		847/678-3371			
Oak Leyden Developmental Services	9620 Johanna	Franklin Park		847/455-0480			
Ogden Apartments	1668 W. Ogden Avenue	Chicago		312-997-2222			
Orchard Village-Developmentally Disabled Only	7670 Marmora Avenue	Skokie	Kat McCormack	847-967-1800	5	Open	1 year
Over the Rainbow-Housing for Physically Disabled Adults	2040 Brown Ave	Evanston	Dorothy Archer	847-328-6633	0	Open	varies
Prairie Haven Homes	301 W. Marquette Road	Chicago		773-874-8528			
Renaissance West	2517 W. Fullerton	Chicago		773-278-8448			
Robineau Group Living Facility	7550 N. Kostner	Skokie	Mary Roth	847-675-8580	1	Open	varies

Table 5.2a – Alternative Subsidized Housing continued

Name of Facility	Street Address	City	Contact Name	Phone No.	Units Available	Waiting List	Waiting Period
Rowan Tree Apartments	500 W. Englewood	Chicago		773-783-7510			
Sanctuary Place	642 North Kedzie	Chicago		773-265-0983			
Seguin Services	Multiple	Cicero		708-222-4530			
Sheba's Place	3239 W. Warren Boulevard	Chicago		773-651-4970			
South Loop Apartments	1521 S. Wabash	Chicago		312-447-4680			
South Shore Apartments	7456 S. South Shore Drive	Chicago		773-734-3100		Open	
St. Andrew's Court	50 N. Hoyne	Chicago		312-226-7620			
St. Leo Residence	7750 S. Emerald Avenue	Chicago		773-651-9950	0	Unknown	
St. Leo Section 811	7741 S. Emerald Avenue	Chicago		773-651-9950		Unknown	
Supportive Housing	419 Keeney	Evanston		847-866-6144	0		
The Children's Place	3059 W. Augusta	Chicago		773-826-1230			
The Midwest	6 N. Hamlin	Chicago		773-265-0323			
Uptown Preservation Apartments	Various	Chicago		312-422-7700	2	Open	
Village Center	5140 Galitz	Skokie	Entry Dept.-CJE	847-674-8962	0	Closed	varies
Vision House	514 E. 50th Place	Chicago		773-624-9112			
Wayne Street Apartments	6808 N. Wayne Street	Chicago		773-381-0815			
West Humboldt Park	1152 N. Christina	Chicago		773-227-7183	2	Open	2 yrs
Woodlawn East Apartments	6146 S. Kenwood Avenue	Chicago		773-955-9290		Unknown	

Table 5.2b – Alternative Housing Partners

NAME OF FACILITY	LOCATION	SERVICE PROVIDED
Progress Center for Independent Living	Forest Park	Provides information, referral, and advocate services for housing the disabled, domestic violence, civil rights, and healthcare
Avenues of Independence	Park Ridge	Assists developmentally disabled adults with independent living skills.
Access Living	Chicago	Provides information, referral, and advocate services for housing the disabled, domestic violence, civil rights, and healthcare.
Skokie Advisory Commission on the Disabilities	Skokie	Information and referrals for the disabled, advocacy services.
United Methodist Homes and Services	Chicago	Housing, medical care, recreation, transportation, home-making for the elderly, adult overnight care, adult day care.
The Over the Rainbow Association	Evanston	Provides accessible barrier-free housing and job opportunities for physically and mentally-disabled adults.
Resources for Community Living	Rolling Meadows	Provides housing, rental subsidies, supportive services, and social activities.
Housing Options for the Mentally Ill in Evanston	Evanston	Provides housing and supportive services for chronically mental ill adults.
Friedman Place Residence for Blind and Visually Impaired	Chicago	Counseling, housing (shelter care home, information and referrals).
Thresholds	Chicago	Advocacy, counseling, housing, recreational and vocational services for the mentally disabled.
Anixter Center	Chicago	Housing, advocacy, counseling, transportation, referrals, vocational guidance for the disabled, homemaking, and emergency services.

7. Supportive Services for Non-Elderly Disabled Residents

HACC has established an agency-wide Resident Services Division (RSD) which has been fully staffed and operational since June of 2009. RSD will focus on linking all public housing and HCV clients to appropriate services and resources to help transition them to self-sufficiency and improve their quality of life.

HACC will continue to provide comparable social services in both elderly-designated and mixed-population developments, for its non-elderly disabled residents.

HACC partners with a network of local community agencies that currently provide or have available supportive services to elderly, near elderly and disabled populations, and will continue to provide housing, counseling, medical assistance, transportation, vocational training, and an array of other supportive services, upon request or referral at the same level currently provided to this population. The level, quality, and availability of services available to the non-elderly resident population of HACC will not be adversely affected by the elderly-only designation.